OPDC Regulation 19(2) Second Revised Draft Local Plan

Draft Policy Formulation Reports

Town Centres and Community Uses Development Management Policies

Planning Committee Version

June 2018

Overview

Policy Formulation Reports are being produced to help demonstrate how individual policies have been developed.

These reports continue to be developed. Further updates will be made to them ready for the second Regulation 19 and to support the submission of the Local Plan.

TCC1: Locations for Town Centre Uses

Legislation, Policy and Guidance Context

National Planning Policy Framework (NPPF)

Policy and paragraph reference	Policy and paragraph text
23	Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should: • recognise town centres as the heart of their communities and pursue policies to support their viability and vitality; • define a network and hierarchy of centres that is resilient to anticipated future economic changes; • allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre; • set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres;
24	Local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.
27	Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the above factors, it should be refused.
38	Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.
156	Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver the provision of retail, leisure and other commercial development.

National Planning Practice Guidance (NPPG)

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Policy and paragraph reference	Policy and paragraph text
Ensuring the Vitality of Town Centres	
Title: What does the National Planning Policy Framework say about planning for town centres? **Paragraph:** 001 **Reference ID:** 2b-001-20140306 **Revision Date:** 06 03 2014	Local planning authorities should plan positively, to support town centres to generate local employment, promote beneficial competition within and between town centres, and create attractive, diverse places where people want to live, visit and work. Local planning authorities should assess and plan to meet the needs of main town centre uses in full, in broadly the same way as for their housing and economic needs, adopting a 'town centre first' approach and taking account of specific town centre policy. In doing so, local planning authorities need to be mindful of the different rates of development in town centres compared with out of centre. This positive approach should include seeking to improve the quality of parking in town centres (in line with the National Planning Policy Framework) and, where it is necessary to ensure the vitality of town centres, the quantity too. Local planning authorities should set appropriate parking charges that do not undermine the vitality of town centres and parking enforcement should be proportionate, avoiding unfairly penalising drivers. The National Planning Policy Framework sets out 2 key tests that should be applied when planning for town centre uses which are not in an existing town centre and which are not in accord with an up to date Local Plan – the sequential test and the impact test. These are relevant in determining individual decisions and may be useful in informing the preparation of Local Plans. The sequential test should be considered first as this may identify that there are preferable sites in town centres for accommodating main town centre uses (and therefore avoid the need to undertake the impact test). The sequential test will identify development that cannot be located in town centres, and which would then be subject to the impact test.
Title: What if the required development cannot be accommodated in the town centre? **Paragraph:** 006 **Reference ID:** 2b-006-20140306 **Revision Date:** 06 03 2014	It may not be possible to accommodate all forecast needs in a town centre: there may be physical or other constraints which make it inappropriate to do so. In those circumstances, planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the need for these main town centre uses, having regard to the sequential and impact tests. This should ensure that any proposed main town centre uses which are not in an existing town centre are in the best locations to support the vitality and vibrancy of town centres, and that no likely significant adverse impacts on existing town centres arise, as set out in paragraph 26 of the National Planning Policy Framework.
Title: What is the sequential	The sequential test guides main town centre uses towards town centre locations first, then, if no town centre locations are

test? **Paragraph:** 008 **Reference ID:** 2b-008-20140306 **Revision Date:** 06 03 2014	available, to edge of centre locations, and, if neither town centre locations nor edge of centre locations are available, to out of town centre locations, with preference for accessible sites which are well connected to the town centre. It supports the viability and vitality of town centres by placing existing town centres foremost in both plan-making and decision-taking.
Title: How should the sequential approach be used in plan-making? **Paragraph:** 009 **Reference ID:** 2b-009-20140306 **Revision Date:** 06 03 2014	In plan-making, the sequential approach requires a thorough assessment of the suitability, viability and availability of locations for main town centre uses. It requires clearly explained reasoning if more central opportunities to locate main town centre uses are rejected. The checklist below sets out the matters that should be considered when taking a sequential approach to plan-making: • Has the need for main town centre uses been assessed? The assessment should consider the current situation, recent up-take of land for main town centre uses, the supply of and demand for land for main town centre uses, forecast of future need and the type of land needed for main town centre uses • Can the identified need for main town centre uses land be accommodated on town centre sites? When identifying sites, the suitability, availability and viability of the site should be considered, with particular regard to the nature of the need that is to be addressed • If the additional main town centre uses required cannot be accommodated in town centre sites, what are the next sequentially preferable sites that it can be accommodated on? Local Plans should contain policies to apply the sequential test to proposals for main town centre uses that may come forward outside the sites or locations allocated in the Local Plan.
Housing and economic development needs assessments	
Title: How should the current situation in relation to economic and main town centre uses be assessed? **Paragraph:** 030 **Reference ID:** 2a-030-20140306 **Revision Date:** 06 03 2014	In understanding the current market in relation to economic and main town centre uses, plan makers should liaise closely with the business community to understand their current and potential future requirements. Plan makers should also consider: • The recent pattern of employment land supply and loss to other uses (based on extant planning permissions and planning applications). This can be generated though a simple assessment of employment land by sub-areas and market segment, where there are distinct property market areas within authorities. • Market intelligence (from local data and discussions with developers and property agents, recent surveys of business needs or engagement with business and economic forums). • Market signals, such as levels and changes in rental values, and differentials between land values in different uses. • Public information on employment land and premises

	required. • Information held by other public sector bodies and utilities in relation to infrastructure constraints. • The existing stock of employment land. This will indicate the demand for and supply of employment land and determine the likely business needs and future market requirements (though it is important to recognise that existing stock may not reflect the future needs of business). Recent statistics on take-up of sites should be consulted at this stage, along with other primary and secondary data sources to gain an understanding of the spatial implications of 'revealed demand' for employment land. • The locational and premises requirements of particular types of business. • Identification of oversupply and evidence of market failure (eg physical or ownership constraints that prevent the employment site being used effectively, which could be evidenced by unfulfilled requirements from business, yet developers are not prepared to build premises at the prevailing market rents).

London Plan (2016) Policies

Policy and paragraph reference	**Policy and paragraph text**
Policy 2.15	D Boroughs should: a(i) sustain and enhance the vitality and viability of centres in the context of the clauses set out below a1 ensure that local retail capacity requirements take realistic account of changes in consumer expenditure and behaviour including the impact of internet and multi-channel shopping within the context of broader strategic assessments of retail need a2 in light of local and strategic capacity requirements (Policy 4.7), identify town centre boundaries, primary shopping areas, primary and secondary frontages in LDF proposals maps and set out policies for each type of area in the context of Map 2.6 and Annex 2 b in co-ordination with neighbouring authorities and the Mayor, relate the existing and planned roles of individual centres to the network as a whole to achieve its broader objectives c proactively manage the changing roles of centres, especially those with surplus retail and office floorspace, considering the scope for consolidating and strengthening them by encouraging a widerrange of services; promoting diversification, particularly through high density, residential-led, mixed use re-development; improving environmental quality; facilitating site assembly, including through the Compulsory Purchase process and revising the extent and/or flexibility for non-A1 retail uses in secondary shopping frontage policies c1 improve Londoners' access to new and emerging forms of retail provision by realising the potential of the more attractive, generally larger town centres for planned re-development as competitive destinations which provide multi-channel shopping facilities and complementary activities including significant, higher density housing in

	a high quality environment c2 actively plan and manage the consolidation and redevelopment of other, mainly medium sized centres and, where relevant other secondary frontages, to secure a sustainable, viable retail offer; a range of non-retail functions to address identified local needs; and significant, higher density housing in a high quality environment c3 ensure that neighbourhood and more local centres provide convenient access, especially by foot, to local goods and services needed on a day to day basis; that they enhance the overall attractiveness of local neighbourhoods and serve as foci for local communities; and that surplus commercial capacity is identified and brought forward to meet housing and local community needs, recognising that this process should contribute to strengthening the 'offer' of the centre as a whole d support and encourage community engagement, town centre management, partnerships and strategies including business improvement districts to promote safety, security, environmental quality and town centre renewal e promote the provision of Shopmobility schemes and other measures to improve
Policy 2.17	B Development proposals in SILs should be refused unless: d) the proposal is for small scale 'walk to' services for industrial occupiers such as workplace crèches or cafes.
Policy 4.7	C In preparing LDFs, boroughs should: c take a proactive partnership approach to identify capacity and bring forward development within or, where appropriate, on the edge of town centres d firmly resist inappropriate out of centre development e manage existing out of centre retail and leisure development in line with the sequential approach, seeking to reduce car dependency, improve public transport, cycling and walking access and promote more sustainable forms of development.
Policy 4.8	A The Mayor will, and boroughs and other stakeholders should, support a successful, competitive and diverse retail sector which promotes sustainable access to the goods and services that Londoners need and the broader objectives of the spatial structure of this Plan, especially town centres (Policy 2.15). Planning decisions and LDF preparation B LDFs should take a proactive approach to planning for retailing and related facilities and services and: a bring forward capacity for additional comparison goods retailing particularly in International, Metropolitan and Major centres b support convenience retail particularly in District, Neighbourhood and more local centres, to secure a sustainable pattern of provision and strong, lifetime neighbourhoods (see Policy 7.1) c provide a policy framework for maintaining, managing and enhancing local and neighbourhood shopping and facilities which provide local goods and services, and develop policies to prevent the loss of retail and related facilities that provide essential convenience and specialist shopping or valued local community assets, including public houses, justified by robust evidence d identify areas under-served in local convenience shopping and services provision and support additional facilities at an appropriate

	scale in locations accessible by walking, cycling and public transport to serve existing or new residential communities e support the range of London's markets, including street, farmers' and, where relevant, strategic markets, complementing other measures to improve their management, enhance their offer and contribute to the vitality of town centres f support the development of e-tailing and more efficient delivery systems g manage clusters of uses having regard to their positive and negative impacts on the objectives, policies and priorities of the London Plan including a centre's: i. broader vitality and viability (Policy 2.15Ca) ii. broader competitiveness, quality or diversity of offer (Policy 2.15Cc) iii. sense of place or local identity (Policy 2.15Ac) iv. community safety or security (Policy 2.15Cf) v. success and diversity of its broader retail sector (Policy 4.8A) vi. potential for applying a strategic approach to transport and land use planning by increasing the scope for "linked trips" (Policy 6.1) vii. role in promoting health and well-being (Policy 3.2D) viii. potential to realise the economic benefits of London's diversity (paragraph 3.3).

Draft London Plan (2017) Policies

Policy and paragraph reference	**Policy and paragraph text**
Policy SD8 Town centres: development principles and Development Plan Documents	A Development Plans and development proposals should take a town centres first approach by: 1) adopting a sequential approach to accommodating town centre uses including retail, commercial, offices, leisure, entertainment, culture, tourism and hotels such that new development of these uses is focused on sites within town centres or (if no sites are available, suitable or viable) on sites on the edges of centres that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport 2) firmly resisting out-of-centre development of town centre uses in line with the sequential approach in A(1) above, with limited exceptions for existing viable office locations in outer London (see Policy E1 Offices) 3) providing an impact assessment on proposals for new, or extensions to existing, edge or out-of-centre development for town centre uses in part A(1) above that are not in accordance with the Development Plan 4) realising the full potential of existing out of centre retail and leisure parks to deliver housing intensification through redevelopment and ensure such locations become more sustainable in transport terms, by securing improvements to public transport, cycling and walking. This should not result in a net increase in retail or leisure floorspace in an out-of-centre location having regard to parts A(1), (2) and (3) above. B In Development Plans, boroughs should: 1) define the detailed boundary of town centres in policy maps including the overall extent of the town centre (taking into consideration associated high streets which have particular economic or social value) along with specific policy-related designations such as primary

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	shopping areas, primary and secondary frontages and night-time economy in light of demand/capacity assessments for town centre uses and housing 2) develop policies through strategic and local partnership approaches (Policy SD9 Town centres: Local partnerships and implementation) to meet the objectives for town centres set out in Policy SD6 Town centres to support the development, intensification and enhancement of each centre, having regard to the current and potential future role of the centre in the network (Policy SD7 Town centre network) 3) develop policies for the edge and fringes of town centres, revising the extent of shopping frontages where surplus to forecast demand and introducing greater flexibility, permitting a range of non-residential uses particularly in secondary frontages taking into account local circumstances 4) identify centres that have particular scope to accommodate new commercial development and higher density housing, having regard to the growth potential indicators for individual centres in Annex 1. Criteria to consider in assessing the potential for intensification in town centres include: a) assessments of demand for retail, office and other commercial uses b) assessments of capacity for additional housing c) public transport accessibility and capacity d) planned or potential transport improvements – to indicate future capacity for intensification e) existing and potential level of density of development and activity f) relationship with wider regeneration initiatives g) vacant land and floorspace – as a further measure of demand and also of under-utilisation of the existing centre h) potential to complement local character, existing heritage assets and improve the quality of the town centre environment i) viability of development. 5) identify sites suitable for higher density mixed-use residential intensification capitalising on the availability of services within walking and cycling distance and current and future public transport provision including, for example: a) comprehensive redevelopment of low-density supermarket sites, surface car parks, and edge of centre retail/leisure parks b) redevelopment of town centre shopping frontages that are surplus to demand c) redevelopment of other low-density town centre buildings that are not of heritage value, particularly where there is under-used space on upper floors, whilst re-providing non-residential uses d) delivering residential above existing commercial, social infrastructure and transport infrastructure uses or re-providing these uses as part of a mixed-use development. 6) support flexibility for temporary or ‘meanwhile’ uses of vacant properties.
Policy E9: Retail, markets and hot food takeaways	A successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported in line with the wider objectives of this Plan, particularly for town centres (Policy SD6 Town centres, Policy SD7 Town centre network, Policy SD8 Town centres: development principles and Development Plan Documents and Policy SD9 Town centres: Local partnerships and implementation). In Development Plans, boroughs should:

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	1. identify future requirements and locations for new retail development having regard to the town centre policies in this Plan and strategic and local evidence of demand and supply 2. identify areas for consolidation of retail space where this is surplus to requirements 3. bring forward capacity for additional comparison goods retailing particularly in International, Metropolitan and Major town centres 4. support convenience retail in all town centres, and particularly in District, Local and Neighbourhood centres, to secure inclusive neighbourhoods and a sustainable pattern of provision where there is less need to travel 5. provide a policy framework to enhance local and neighbourhood shopping facilities and prevent the loss of retail and related facilities that provide essential convenience and specialist shopping 6. identify areas under-served in local convenience shopping and related services and support additional facilities to serve existing or new residential communities in line with town centre Policy SD8 Town centres: development principles and Development Plan Documents 7. support the range of London's markets, including street markets, covered markets, specialist and farmers' markets, complementing other measures to improve their management, enhance their offer and contribute to the vitality of town centres and the Central Activities Zone 8. manage existing edge of centre and out of centre retail (and leisure) by encouraging comprehensive redevelopment for a diverse mix of uses in line with Policy SD6 Town centres, Policy SD7 Town centre network, Policy SD8 Town centres: development principles and Development Plan Documents and Policy SD9 Town centres: Local partnerships and implementation to realise their full potential for housing intensification, reducing car use and dependency, and improving access by walking, cycling and public transport 9. manage clusters of retail and associated uses having regard to their positive and negative impacts on the objectives, policies and priorities of the London Plan including: • town centre vitality, viability and diversity • sustainability and accessibility • place-making or local identity • community safety or security • mental and physical health and wellbeing. E Large-scale commercial development proposals (containing over 2,500 sqm gross A Class floorspace) should support the provision of small shops and other commercial units (including affordable units where there is evidence of local need). F Development proposals involving the redevelopment of surplus retail space should support other planning objectives and include alternative town centre uses on the ground floor where viable (and in accordance with town centre Policy SD8 Town centres: development principles and Development Plan Documents) and residential development

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Mayor's Town Centres SPG

Policy and paragraph reference	Policy and paragraph text
SPG Implementation 1.1	Boroughs and town centre partners are encouraged to: a Promote a viable and diverse mix of retailing including independents, multiples and specialist provision to meet identified and projected needs b Assess the realistic level of demand for new and reconfigured retail floorspace in local retail capacity studies having regard to: consumer expenditure projections (comparison and convenience goods); demographic projections; up-to-date estimates of growth in on-line and multi-channel retailing; improvements to the productivity of retail floorspace; the committed pipeline of retail floorspace development; and the role and function of town centres c Understand the changing qualitative need for retail floorspace including that for modern, fit-for-purpose retail floorspace d Reconcile local assessments of retail demand with the latest strategic London-wide assessment for comparison goods retail e Develop proactive local plans and policies to accommodate projected demand for retail floorspace (including improvement in quality of space) through mixed use redevelopment within primary or viable secondary town centre frontages or on well integrated edge of centre sites f where retail floorspace is in oversupply, develop local policies in line with London Plan policy to manage changes to non-retail uses particularly in secondary and tertiary frontages and support mixed use redevelopment including housing g keep local plan policies under regular review to allow town centres and the mix of retail uses relative to cultural, leisure, business, residential, civic and community services to evolve over time to remain competitive h define primary shopping areas, primary and secondary frontages in Local Plans and take into account the impact of Government's retail to residential permitted development rights proposals on the vitality and viability of town centres, the potential for a co-ordinated approach to housing intensification in town centres and the availability of convenience retail and essential services.
SPG Implementation 5.1 Regenerating Town Centres	Boroughs and town centre partners are encouraged to: a work collaboratively with the private sector and other stakeholders to develop policies and proposals to secure investment in Regeneration Areas including town centres in need of regeneration, by strengthening and/or identifying opportunities for sustainable growth and intensification of centres, including for residential development and improving access to local facilities b secure new neighbourhood retail and service provision in large residential developments and as a focus for local place shaping in major development locations including Opportunity Areas c ensure that planned investments through the Outer London Fund, Regeneration Fund, London Enterprise Fund and the Growing places Fund is integrated with wider town centre objectives d capitalise on the investment and opportunities to share learning experiences from projects supported by the Mayor's regeneration programmes and the Portas Pilot Town Teams.
SPG	Boroughs and other town centre partners should:

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Implementation 6.3 Sequential Approach, Impact Tests and Town Centre Development	a) follow a firm 'town centres first' approach to accommodate growth and support well integrated, sustainable, edge-of-centre development that could not otherwise be accommodated in-centre (the London approach to the 'sequential test') b undertake impact assessments in line with the NPPF and practice guidance taking into account London's unique circumstances and retail floorspace in the planning pipeline including that in neighbouring boroughs and outside London where appropriate c bring forward town centre capacity to support town centre vitality and viability and meet needs for commercial development and housing through intensification and redevelopments at higher densities taking into account other London Plan policies d consider how edge of centre sites can be better integrated with town centres. e resist inappropriate out of centre development with clear guidelines on the exceptional circumstances where such development may be appropriate f make existing edge and out of centre retail, leisure and office developments more sustainable in transport terms, by promoting inclusive access by public transport, cycling and walking and consider their potential to realise capacity for new housing

Land for Industry and Transport SPG (2012)

9.17	Provision should be made to improve access to small scale, 'walk to' amenities and services including crèches, which serve the needs of people working within industrial areas. Such provision is likely to be particularly important in SIL.

Regulation 18 Policy Options

Policy and paragraph reference	**Policy and paragraph text**
TC1 and TC2	Policy options for the designations of town centres have been set out next to Strategic Policy SP6: Places and Destinations. Aside from the town centre hierarchy, alternative policy options for the delivery of town centre uses were not considered in the Regulation 18 Local Plan as alternative options would not be in accordance with the clear 'town centre first' approach outlined in both national and regional planning policy.

Key Consultation Issues

Regulation 18 consultation

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What is the issue?	Who raised the issue?	What was done to address the issue?
Additional town centres: A new neighbourhood centre should be located by the Atlas Road roundabout A more flexible approach should be taken in Park Royal to allow smaller retail clusters to develop	Grand Union Alliance, Wells House Road Resident's Association, 4 local residents	Change proposed. The Retail and Leisure Needs Study and Local Plan have been updated to identify a new neighbourhood centre in this location, named 'Atlas Junction'. This has resulted from further work looking into the spatial requirements for retail provision in the OPDC area and acknowledgement of both committed and implemented schemes at Atlas Junction, which are resulting in the clustering of retail uses in this location, which can help to meet the needs of new development and address deficiencies in access to town centre uses for local communities.

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Town Centre Boundaries: The next draft of the Local Plan needs to set clearer town centre boundaries and potentially define primary frontages.	Brent Council, Hammersmith and Fulham Council, Imperial College London, Old Oak Park (DP9)	No change proposed. The revised Local Plan includes a policies map, which sets a detailed boundary for Park Royal Neighbourhood Centre. For Old Oak High Street, North Acton and Atlas Junction, the exact alignment of the High Street has not yet been fixed, and for North Acton and Atlas Junction, the exact location of centre is yet to be determined, so the policies map so provides an indicative boundary, in a similar style to LLDC's proposals for new district and neighbourhood centres in their Local Plan.

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Impact Assessments: Some stakeholders argued that the threshold of 5,000sqm and 2,500sqm for a retail impact assessment is too high and not appropriate, whilst others argued that as quantums had already been tested in the Retail and Leisure Needs Study, impact assessments should only be required for schemes that exceed the quantums within the study.	Brent Council, Grand Union Alliance, Old Oak Park (DP9), Royal Borough of Kensington and Chelsea	No change proposed. The Retail and Leisure Needs Study has assessed the impact of town centre uses on designated centres and identified appropriate mitigation measures to ensure that impacts are minimised. These measures have been incorporated into the Local Plan's policies. The thresholds identified in the Retail and Leisure Study and Local Plan accord with the threshold in the NPPF, but goes beyond these requirements by also identifying that the impact assessments would also be required within designated centres, as these are emerging, as not yet established centres. OPDC considers this approach will ensure that impacts on existing designated centres are appropriately mitigated. The Retail and Leisure Needs Study identifies that as 3 out of the 4 proposed town centres within the OPDC area were not designated centres prior to this Local Plan, it is sensible to still require impact assessments to ensure that impacts on existing designated centres are minimised.

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Access to local services in Strategic Industrial Location (SIL): Differing views on the approach to improving access to local services. The majority of stakeholders supported a central hub at Park Royal Centre, but they also considered that town centre uses should be more distributed across SIL.	Brent Council, Ealing Council, SEGRO, Midland Terrace Resident's Group, Old Oak Interim Forum, TITRA, 2 local residents	Noted. The priority is to protect the industrial uses and ensure future town centre development does not undermine their ability to function successfully. OPDC continues to propose that town centre uses in Park Royal are focussed in Park Royal Centre (P6). A cluster has been identified in Park Royal West (Brewery), which has also been identified as a potential location for small-scale town centre uses. Policy TCC1 also supports town centre uses within the Strategic Industrial Location (SIL), where they support the viability of an industrial businesses' operation, reduce the need to travel by car and do not have an unacceptable adverse impact on the operation of the road network, and are small-scale, meeting local need and do not have an unacceptable impact on the functioning of SIL and support the role of designated town centres

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What was done to address the issue?
TCC1 part e) is not in conformity with the London Plan as it allowed Town Centre uses within SIL, leading to incremental erosion of SIL.	Ealing Council, Mayor of London	Change proposed. The policy for town centre uses in SIL has been revised to more closely align with the requirements of the London Plan - that being that uses should be small-scale walk-to services such as small creches and cafes.
Broadly support Policy TCC1	Royal Borough of Kensington and Chelsea	Noted.

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What is the issue?	Who raised the issue?	What was done to address the issue?
The policy is not sound as no mention is made in Policy TCC1 of the need to assess potential impacts of town centre uses on neighbouring centres, particularly Harlesden, as indicated in the Retail and Leisure Needs Study (para 8.1.10).	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The requirements for a Harlesden Enhancement Strategy were set out in the revised draft Local Plan Place policies for Old Oak South, Old Oak North and Willesden Junction and was referenced in the supporting text to Policy TCC3. However, OPDC concurs that these requirements would be clearer if included in Policy TCC1. The requirements for potential enhancements to Harlesden have therefore been relocated into this policy.
The only statement in Chapter 10 concerning the potential impact on Harlesden is made in TTC3(f) A Class Uses and supporting text 10.22 and 10.23. However, this policy and these text paragraphs refer to town centre uses in general and not to A-class uses specifically. This should be relocated to TCC1 and a statement about the nature of Harlseden town centre, its contribution to meeting the needs of existing residents, and its potential to play a role in and benefit from the developments in the OPDC area, as well as to be potentially negatively impacted by these developments should be made here	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The requirements for potential enhancements to Harlesden have been relocated to TCC1. The supporting text recognises that the RLNS identifies that Harlesden is likely to be most impacted by regeneration, but that there are also opportunities for the centre to capture spend from the new population and that these opportunities should be explored through the Harlesden Enhancement Strategy.
The general London Plan aim of “managed growth” for Harlesden should be included here, noting the commitment then of the London Plan to enhance the quality and diversity of shops and to safeguard traditional retail uses	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Harlesden Town Centre is not within the OPDC boundary. While it is appropriate to make broad reference to the centre when referring to the Harlesden Enhancement Strategy, the planning policy for the future of centre should be set through LB Brent's Local Plan.

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What is the issue?	Who raised the issue?	What was done to address the issue?
A clear statement is needed concerning what the potential damage to Harlesden of OPDC development might be across the range of town centre uses, thus in every TCC policy section, and what effective mitigation is required.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Retail and Leisure Needs Study identifies that Harlesden Centre will undergo growth over the next 20 years, both as a result of background growth, and also as a result of expenditure from the OPDC area. Within OPDC's Retail and Leisure Needs Study, estimates for floorspace provision within the OPDC area have been made on the basis of 80% retention of convenience expenditure and 20% retention of comparison expenditure, meaning there will be significant opportunities for Harlesden to capture this growth. Enhancements to Harlesden are therefore likely to be focussed more on opportunities to capture growth rather than to mitigate impacts. Consideration would of course need to be had to the Section 106 tests. Regardless, OPDC does not consider it appropriate to fix not what sort of measures will be required to support Harlesden. There will be a need for flexibility to consider what measures may be required to mitigate any impacts.
Need a stronger consideration of how neighbouring areas will shape the plans for the OPDC area in respect of town centre uses	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Retail and Leisure Needs Study factored in background growth and known planned expansions to town centres to inform the recommendations in the study.
A more detailed breakdown of potential commercial floorspace by location, including clusters, should be provided	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The place policies have indicative jobs targets, but there needs to be a degree of flexibility over which particular sector these jobs are provided within. The amount of floorspace within different B-class uses, D-class uses and within use class C1 will need to be treated flexibly by place and cluster. Site allocations also have indicative floorspace and jobs targets. Table 10.1 does set out indicative A-class use figures, based on current population projections and

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What is the issue?	Who raised the issue?	What was done to address the issue?
		estimates of expenditure retention.
There is a discrepancy between Figure 10.2 and the Policies Map in the depiction of Old Oak High Street at Willesden Junction	Harlesden Neighbourhood Forum	Change proposed. The policies map has been altered to align with Figure 10.2.
The threshold for a Harlesden Enhancement Strategy should be 2,500 sq m as this is the level of development that the NPPF states should be the default level for impact assessment where a level has not been set.	Harlesden Neighbourhood Forum	No change proposed. The rationale for the 5,000sqm threshold is set out in the Retail and Leisure Needs Study. The Old Oak Major Town centre is a new town centre. If in existence, no impact assessment would be required, but the Study identifies that as the centre has not yet been delivered it is appropriate to still require impact assessments. The Study has assessed the broad impact of a new centre on the surrounding town centre hierarchy and this has shown that most impacts are likely to be positive as a consequence of the ability of surrounding centres to capture spend from the new population moving to the area.
Care should be taken that sequential test in TCC1 does not allow proliferation of retail uses surrounding SIL.	London Borough of Ealing	Change proposed. Policy TCC1 has been amended to ensure the sequential approach does not undermine the function of SIL.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Relevant recommendations

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Retail and Leisure Needs Study	• Town centre uses should be focused within a major town centre and new and amended neighbourhood town centres. • A series of policies should be put in place to ensure a high quality of retail that supports placemaking, including the support for independent retailers, measures to mitigate impacts on existing town centres and support for meanwhile uses • Findings from case studies note the importance of meanwhile or 'pop-up' uses to the early place-making and activation of the area and the planning policy should look to support such uses (para 7.4.8) • Within Strategic Industrial Location (SIL), there is the potential for ancillary retail uses (para 7.5.15) to help meet the retail and other town centre use needs of the area

Rationale for any non-implemented recommendations

Supporting Study	**Recommendations**	Rationale for not including
N/A	N/A	N/A

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TCC2: Vibrancy

Legislation, Policy and Guidance Context

National Planning Policy Framework (NPPF)

Policy and paragraph reference	Policy and paragraph text
23	Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should: • recognise town centres as the heart of their communities and pursue policies to support their viability and vitality; • promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres; • retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive;
70	To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: • plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments; • ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community; and • ensure an integrated approach to considering the location of housing, economic uses and community facilities and services
161	Local planning authorities should use this evidence base to assess: • the role and function of town centres and the relationship between them, including any trends in the performance of centres;
171	Local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation and places of worship), including expected future changes, and any information about relevant barriers to improving health and well-being.

National Planning Practice Guidance (NPPG)

Policy and paragraph reference	Policy and paragraph text
Ensuring the vitality of town centres	
Title: What does the National Planning Policy	Local planning authorities should plan positively, to support town centres to generate local employment, promote beneficial competition within and between town centres, and create

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Framework say about planning for town centres? **Paragraph:** 001 **Reference ID:** 2b-001-20140306 **Revision Date:** 06 03 2014	attractive, diverse places where people want to live, visit and work. Local planning authorities should assess and plan to meet the needs of main town centre uses in full, in broadly the same way as for their housing and economic needs, adopting a 'town centre first' approach and taking account of specific town centre policy. In doing so, local planning authorities need to be mindful of the different rates of development in town centres compared with out of centre. This positive approach should include seeking to improve the quality of parking in town centres (in line with the National Planning Policy Framework) and, where it is necessary to ensure the vitality of town centres, the quantity too. Local planning authorities should set appropriate parking charges that do not undermine the vitality of town centres and parking enforcement should be proportionate, avoiding unfairly penalising drivers. The National Planning Policy Framework sets out 2 key tests that should be applied when planning for town centre uses which are not in an existing town centre and which are not in accord with an up to date Local Plan – the sequential test and the impact test. These are relevant in determining individual decisions and may be useful in informing the preparation of Local Plans. The sequential test should be considered first as this may identify that there are preferable sites in town centres for accommodating main town centre uses (and therefore avoid the need to undertake the impact test). The sequential test will identify development that cannot be located in town centres, and which would then be subject to the impact test. The impact test determines whether there would be likely significant adverse impacts of locating main town centre development outside of existing town centres (and therefore whether the proposal should be refused in line with policy). It applies only above a floorspace threshold as set out in paragraph 26 of the National Planning Policy Framework.
Title: What does the National Planning Policy Framework say about planning for town centres? **Paragraph:** 005 **Reference ID:** 2b-005-20140306 **Revision Date:** 06 03 2014	The following indicators, and their changes over time, are relevant in assessing the health of town centres: • diversity of uses • proportion of vacant street level property • commercial yields on non-domestic property • customers' views and behaviour • retailer representation and intentions to change representation • commercial rents • pedestrian flows • accessibility • perception of safety and occurrence of crime • state of town centre environmental quality Not all successful town centre regeneration projects have been retail led or involved significant new development. Improvements to the public realm, transport (including parking) and accessibility

	as well as other measures promoted through partnership can also play important roles. Any strategy should identify relevant sites, actions and timescales, and be articulated clearly in the Local Plan, where it can be considered by local people and investors. It should be regularly reviewed, assessing the changing role and function of different parts of the town centre over time.
Health and Wellbeing	
Title: What are the links between health and planning? **Paragraph:** 002 **Reference ID:** 53-002-20140306 **Revision Date:** 06 03 2014	The link between planning and health has been long established. The built and natural environments are major determinants of health and wellbeing. The importance of this role is highlighted in the promoting health communities section. This is further supported by the 3 dimensions to sustainable development (see National Planning Policy Framework paragraph 7. Further links to planning and health are found throughout the whole of the National Planning Policy Framework. Key areas include the core planning principles (see National Planning Policy Framework paragraph 17) and the policies on transport (see National Planning Policy Framework chapter 4, high quality homes (see National Planning Policy Framework chapter 6), good design (see National Planning Policy Framework chapter 7), climate change (see National Planning Policy Framework chapter 10) and the natural environment (see National Planning Policy Framework chapter 11). The National Planning Policy Framework encourages local planning authorities to engage with relevant organisations when carrying out their planning function. In the case of health and wellbeing, the key contacts are set out in this guidance. Engagement with these organisations will help ensure that local strategies to improve health and wellbeing) and the provision of the required health infrastructure (see National Planning Policy Framework paragraphs 7, 156 and 162) are supported and taken into account in local and neighbourhood plan making and when determining planning applications. The range of issues that could be considered through the plan-making and decision-making processes, in respect of health and healthcare infrastructure, include how: • development proposals can support strong, vibrant and healthy communities and help create healthy living environments which should, where possible, include making physical activity easy to do and create places and spaces to meet to support community engagement and social capital; • the local plan promotes health, social and cultural wellbeing and supports the reduction of health inequalities; • the local plan considers the local health and wellbeing strategy and other relevant health improvement strategies in the area; • the healthcare infrastructure implications of any relevant proposed local development have been considered;

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	• opportunities for healthy lifestyles have been considered (eg planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical activity, and promotes access to healthier food, high quality open spaces, green infrastructure and opportunities for play, sport and recreation); • potential pollution and other environmental hazards, which might lead to an adverse impact on human health, are accounted for in the consideration of new development proposals; and • access to the whole community by all sections of the community, whether able-bodied or disabled, has been promoted.
Title: What is a healthy community? **Paragraph:** 005 **Reference ID:** 53-005-20140306 **Revision Date:** 06 03 2014	A healthy community is a good place to grow up and grow old in. It is one which supports healthy behaviours and supports reductions in health inequalities. It should enhance the physical and mental health of the community and, where appropriate, encourage: • Active healthy lifestyles that are made easy through the pattern of development, good urban design, good access to local services and facilities; green open space and safe places for active play and food growing, and is accessible by walking and cycling and public transport. • The creation of healthy living environments for people of all ages which supports social interaction. It meets the needs of children and young people to grow and develop, as well as being adaptable to the needs of an increasingly elderly population and those with dementia and other sensory or mobility impairments.
Title: What are the links between health and planning? **Paragraph:** 006 **Reference ID:** 53-006-20170728 **Revision Date:** 28 07 2017	Planning can influence the built environment to improve health and reduce obesity and excess weight in local communities. Local planning authorities can have a role in enabling a healthier environment by supporting opportunities for communities to access a wide range of healthier food production and consumption choices. Local planning authorities can consider bringing forward, where supported by an evidence base, local plan policies and supplementary planning documents, which limit the proliferation of certain use classes in identified areas, where planning permission is required. In doing so, evidence and guidance produced by local public health colleagues and Health and Wellbeing Boards may be relevant. Policies may also request the provision of allotments or allotment gardens, to ensure the provision of adequate spaces for food growing opportunities. Local planning authorities and planning applicants could have particular regard to the following issues: • proximity to locations where children and young people congregate such as schools, community centres and playgrounds • evidence indicating high levels of obesity, deprivation and general poor health in specific locations

	• over-concentration and clustering of certain use classes within a specified area • odours and noise impact • traffic impact • refuse and litter • Planning conditions, section 106 planning obligations and the Community Infrastructure Levy may be potential mechanisms for securing a healthy environment in granting planning permission.

Healthy High Streets – Good Place Making in an Urban Setting (2018)

Policy / paragraph reference	Policy and paragraph text
Part 3: Conclusions and Recommendations	Directors of public health, and local authorities including planning authorities, should: 1. Work closely with local colleagues who fund and drive built environment interventions to ensure opportunities for improving population health are clearly understood and that appropriate action is taken to target areas most in need. 2. Consider how their teams can continue to develop persuasive, evidence-informed cases that highlight the impacts of the high street on health and how these can be applied locally to inform and assess future health-promoting interventions. 3. Ensure that the regeneration and development of high streets focuses on inclusive design for all, and that opportunities to reduce health inequalities are maximised. 4. Use planning and licensing policies to influence the retail offer on the high street, protecting locally-owned retail stores and tackling over-concentration of certain shops, to conserve retail establishments that stock healthier, locally sourced products. 5. Ensure plans and strategies for businesses, transport infrastructure and social and community services maximise opportunities for health improvement, particularly for those most vulnerable to health inequalities. 6. Consider how they might encourage and support community groups to be more resilient to change, and individuals more involved in planning and implementing health-promoting high street interventions.

London Plan (2016) Policies

Policy and paragraph reference	Policy and paragraph text
Chapter 2 : London's Places	
Policy 2.15 Town Centres	D Boroughs should: a(i) sustain and enhance the vitality and viability of centres in the context of the clauses set out below a1 ensure that local retail capacity requirements take realistic account of changes in consumer expenditure and behaviour including the impact

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	of internet and multi-channel shopping within the context of broader strategic assessments of retail need a2 in light of local and strategic capacity requirements (Policy 4.7), identify town centre boundaries, primary shopping areas, primary and secondary frontages in LDF proposals maps and set out policies for each type of area in the context of Map 2.6 and Annex 2 b in co-ordination with neighbouring authorities and the Mayor, relate the existing and planned roles of individual centres to the network as a whole to achieve its broader objectives c proactively manage the changing roles of centres, especially those with surplus retail and office floorspace, considering the scope for consolidating and strengthening them by encouraging a widerrange of services; promoting diversification, particularly through high density, residential-led, mixed use re-development; improving environmental quality; facilitating site assembly, including through the Compulsory Purchase process and revising the extent and/or flexibility for non-A1 retail uses in secondary shopping frontage policies c1 improve Londoners' access to new and emerging forms of retail provision by realising the potential of the more attractive, generally larger town centres for planned re-development as competitive destinations which provide multi-channel shopping facilities and complementary activities including significant, higher density housing in a high quality environment c2 actively plan and manage the consolidation and redevelopment of other, mainly medium sized centres and, where relevant other secondary frontages, to secure a sustainable, viable retail offer; a range of non-retail functions to address identified local needs; and significant, higher density housing in a high quality environment c3 ensure that neighbourhood and more local centres provide convenient access, especially by foot, to local goods and services needed on a day to day basis; that they enhance the overall attractiveness of local neighbourhoods and serve as foci for local communities; and that surplus commercial capacity is identified and brought forward to meet housing and local community needs, recognising that this process should contribute to strengthening the 'offer' of the centre as a whole d support and encourage community engagement, town centre management, partnerships and strategies including business improvement districts to promote safety, security, environmental quality and town centre renewal e promote the provision of Shopmobility schemes and other measures to improve
Chapter 3: London's People	
Policy 3.2 Improving Health and Reducing Health Inequalities	E Boroughs should: a work with key partners to identify and address significant health issues facing their area and monitor policies and interventions for their impact on reducing health inequalities b promote the effective management of places that are safe, accessible and encourage social cohesion c integrate planning, transport, housing, environmental and health policies to promote the health and wellbeing of communities d ensure that the health inequalities impact of development is taken into account in light of the Mayor's Best Practice Guidance on Health issues in Planning.

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Chapter 4 : London's Economy	
Policy 4.8 Supporting a Successful and Diverse Retail Sector and Related Facilities and Services	e support the range of London's markets, including street, farmers' and, where relevant, strategic markets, complementing other measures to improve their management, enhance their offer and contribute to the vitality of town centres g manage clusters of uses having regard to their positive and negative impacts on the objectives, policies and priorities of the London Plan including a centre's: i. broader vitality and viability (Policy 2.15Ca) ii. broader competitiveness, quality or diversity of offer (Policy 2.15Cc) iii. sense of place or local identity (Policy 2.15Ac) iv. community safety or security (Policy 2.15Cf) v. success and diversity of its broader retail sector (Policy 4.8A) vi. potential for applying a strategic approach to transport and land use planning by increasing the scope for "linked trips" (Policy 6.1) vii. role in promoting health and well-being (Policy 3.2D) viii. potential to realise the economic benefits of London's diversity (paragraph 3.3).
Policy 4.9 Small Shops	B In LDFs, Boroughs should develop local policies where appropriate to support the provision of small shop units.
Chapter 7: London's Living Spaces and Places	
Policy 7.1 Lifetime Neighbourhoods	C Development should enable people to live healthy, active lives; should maximize the opportunity for community diversity, inclusion and cohesion; and should contribute to people's sense of place, safety and security. Places of work and leisure, streets, neighbourhoods, parks and open spaces should be designed to meet the needs of the community at all stages of people's lives, and should meet the principles of lifetime neighbourhoods.

Draft London Plan (2017) Policies

Policy and paragraph reference	**Policy and paragraph text**
Chapter 1. Planning London's Future	
Policy GG3 Creating a healthy city	To improve Londoners' health and reduce health inequalities, those involved in planning and development must: A Ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities. B Promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices. G Seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options.
Chapter 2. Spatial Development Patterns	
Policy SD6 Town centres	A London's varied town centres and their vitality and viability should be promoted and enhanced as: 6) a key mechanism for building sustainable, healthy, walkable neighbourhoods with the Healthy Streets Approach embedded in their development and management.

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	F The management of vibrant daytime, evening and night-time activities should be promoted to enhance town centre vitality and viability, having regard to the role of individual centres in the night-time economy (see Figure 7.7 and Table A1.1) and supporting the development of cultural uses and activity.
Policy SD8 Town centres: development principles and Development Plan Documents	A Development Plans and development proposals should take a town centres first approach by: 1) adopting a sequential approach to accommodating town centre uses including retail, commercial, offices, leisure, entertainment, culture, tourism and hotels such that new development of these uses is focused on sites within town centres or (if no sites are available, suitable or viable) on sites on the edges of centres that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport 2) firmly resisting out-of-centre development of town centre uses in line with the sequential approach in A(1) above, with limited exceptions for existing viable office locations in outer London (see Policy E1 Offices) 3) providing an impact assessment on proposals for new, or extensions to existing, edge or out-of-centre development for town centre uses in part A(1) above that are not in accordance with the Development Plan 4) realising the full potential of existing out of centre retail and leisure parks to deliver housing intensification through redevelopment and ensure such locations become more sustainable in transport terms, by securing improvements to public transport, cycling and walking. This should not result in a net increase in retail or leisure floorspace in an out-of-centre location having regard to parts A(1), (2) and (3) above. B In Development Plans, boroughs should: 1) define the detailed boundary of town centres in policy maps including the overall extent of the town centre (taking into consideration associated high streets which have particular economic or social value) along with specific policy-related designations such as primary shopping areas, primary and secondary frontages and night-time economy in light of demand/capacity assessments for town centre uses and housing 2) develop policies through strategic and local partnership approaches (Policy SD9 Town centres: Local partnerships and implementation) to meet the objectives for town centres set out in Policy SD6 Town centres to support the development, intensification and enhancement of each centre, having regard to the current and potential future role of the centre in the network (Policy SD7 Town centre network) 3) develop policies for the edge and fringes of town centres, revising the extent of shopping frontages where surplus to forecast demand and introducing greater flexibility, permitting a range of non-residential uses particularly in secondary frontages taking into account local circumstances 6) support flexibility for temporary or 'meanwhile' uses of vacant properties.
Chapter 6. Economy	
Policy E9: Retail, markets and hot food takeaways	A. A successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported in line with the wider objectives of this Plan, particularly for town centres (Policy SD6 Town centres, Policy SD7 Town centre

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	network, Policy SD8 Town centres: development principles and Development Plan Documents and Policy SD9 Town centres: Local partnerships and implementation). B In Development Plans, boroughs should: 7 support the range of London's markets, including street markets, covered markets, specialist and farmers' markets, complementing other measures to improve their management, enhance their offer and contribute to the vitality of town centres and the Central Activities Zone 9 manage clusters of retail and associated uses having regard to their positive and negative impacts on the objectives, policies and priorities of the London Plan including: • town centre vitality, viability and diversity • sustainability and accessibility • place-making or local identity • community safety or security • mental and physical health and wellbeing. C Development proposals containing A5 hot food takeaway uses should not be permitted where these are within 400 metres walking distance of an existing or proposed primary or secondary school. Boroughs that wish to set a locally-determined boundary from schools must ensure this is sufficiently justified. Boroughs should also consider whether it is appropriate to manage an over-concentration of A5 hot food takeaway uses within Local, District and other town centres through the use of locally-defined thresholds in Development Plans. D Where development proposals involving A5 hot food takeaway uses are permitted, these should be conditioned to require the operator to achieve, and operate in compliance with, the Healthier Catering Commitment standard. F Development proposals involving the redevelopment of surplus retail space should support other planning objectives and include alternative town centre uses on the ground floor where viable (and in accordance with town centre Policy SD8 Town centres: development principles and Development Plan Documents) and residential development.

Mayor's Town Centres SPG

Policy and paragraph reference	**Policy and paragraph text**
SPG Implementation (Summary) – Promoting Vibrant and Viable Town Centres	Boroughs and town centre partners are encouraged to: a) promote strong, successful, vibrant and viable town centres b) develop their role as the hub of the community, providing a sense of place and identity and contributing to healthy and lifetime neighbourhoods e) promote flexible, adaptable and resilient town centres g) enshrine high standards of quality in design, the town centre environment and public realm m) develop cross-border co-operation between local authorities within London and those outside to support a co-ordinated approach to town centre development and monitor trends in health checks.

SPG Implementation 1.1	Boroughs and town centre partners are encouraged to a) Promote a viable and diverse mix of retailing including independents, multiples and specialist provision to meet identified and projected needs c) Understand the changing qualitative need for retail floorspace including that for modern, fit-for-purpose retail floorspace or viable secondary town centre frontages or on well integrated edge of centre sites e) Develop proactive local plans and policies to accommodate projected demand for retail floorspace (including improvement in quality of space) through mixed use redevelopment within primary or viable secondary town centre frontages or on well integrated edge of centre sites h) define primary shopping areas, primary and secondary frontages in Local Plans and take into account the impact of Government's retail to residential permitted development rights proposals on the vitality and viability of town centres, the potential for a co-ordinated approach to housing intensification in town centres and the availability of convenience retail and essential services.
SPG Implementation 1.2	Boroughs and town centre partners are encouraged to: h) recognise and support the positive contribution that restaurants, cafes and other leisure uses can make to the town centre I) manage over-concentrations of activities, for example betting shops, hot food takeaways and pay day loan outlets
SPG Implementation 3.2 Planning for Lifetime Neighbourhoods	Boroughs and town centre partners are encouraged to: a) promote healthy neighbourhoods and develop the role of town centres (including local and neighbourhood centres) as the core of 'lifetime neighbourhoods' d)support initiatives which promote access to fresh food.
SPG Implementation 3.5 Markets	Boroughs and town centre partners are encouraged to: b) consider enhancing existing markets and re-introducing or creating new ones f) integrate markets in the wider management of town centres, including town centre strategies (see section 6.1) and their role in addressing under-served areas (section 3.1) g) promote a competitive town centre environment

Regulation 18 Policy Options

Policy	Paragraph Reference	Paragraph
Alternative policy option 1. Take a more flexible approach to betting shops, pay-day loan shops and takeaways.	9.38	This option would not look to resist these uses and would instead consider proposals for such uses on their merits, having regard to their impact on amenity, transport and other Local Plan considerations. The benefits to this approach would be that it would be more responsive to market demands. However, the option would have significant negatives as it could result in the proliferation of these uses and would not promote OPDC's role as a healthy new part of London.

Key Consultation Issues

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Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Healthy town centres: Consultees supported OPDC controlling an overconcentration of betting shops, pay-day loan shops games arcades and takeaways. Consultees stated that OPDC should set clear policy as to what constitutes overconcentration and should also set a clear limit on the proximity of takeaways to schools.	Brent Council, Diocese of London, Hammersmith and Fulham Council	Change proposed. The revised Local Plan is supported by a Healthy town centres study, which provides evidence supporting OPDC's approach to controlling takeaways, betting shops etc. OPDC's policy approach towards controlling these uses is set out in Policy TCC2.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Support approach to controlling hot food takeaways	NHS Brent CCG, Health and Wellbeing Board - London Borough of Ealing, Hammersmith and Fulham Council, Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyto	Noted.
Support seeking to control take-aways around schools as there is clear evidence linking the proliferation of fast food outlets to childhood obesity.	Mayor of London, London Obesity Leadership Group, Health and Wellbeing Board - London Borough of Ealing, Hammersmith and Fulham Council, Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
Policy should consider increasing distance of control around primary schools to 400m	London Obesity Leadership Group, Hammersmith and Fulham Council	No change proposed. OPDC's Healthy Town Centre Study shows a 400m restriction around both primary and secondary schools would exclude almost all of the OPDC Area including the whole of the planned Old Oak Major Town Centre and therefore, the Old Oak Major Town Centre would not provide any hot food takeaways. This would be considered unreasonable and OPDC recognise the value of hot food takeaways to the economy, food choice and the need for a balanced approach in order to create a vibrant and healthy town centre
Support policy seeking to limit over-concentration of hot food take-aways in centres	Mayor of London, London Obesity Leadership Group, Health and Wellbeing Board - London Borough of Ealing, Hammersmith and Fulham Council, Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Support requiring schemes to operate in compliance with the Healthier Catering Commitment scheme	London Obesity Leadership Group, Hammersmith and Fulham Council	Noted.
Policy should require organisations to operate in compliance with the Governments Food Buying Standards	London Obesity Leadership Group, Hammersmith and Fulham Council	Change proposed. The policy has been revised to encourage developers to operate in compliance with the Government's food buying standards.
Support approach to managing betting shops, pawnbrokers, payday loan stores and games arcades	Mayor of London, Health and Wellbeing Board - London Borough of Ealing, Hammersmith and Fulham Council	Noted.
Support Policy TCC2	Friary Park Preservation Group	Noted.
Consideration should be given to the impact on neighbouring town centres	David Craine	No change proposed. This is dealt with in TCC1.

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
The vibrancy policy is aspirational, with no evidence that schemes in North Acton can be activitated, despite a cluster of high density buildings	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Schemes in North Acton were implemented in advance of OPDC's production of the Local Plan.
TCC2c) seems to be missing a 'not'	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The word 'no' has been deleted to make the policy effective.
This policy is not sound as it conflicts with TCC3f) and requirement to mitigate impacts on Harlesden. Additional policy text should be inserted, stating that on applying for change of use, assessment of the impact on neighbouring town centres will be required, and planning permission will be subject to that assessment.	Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Impact Assessments are required where they meet the thresholds set out in Policy TCC1. There is not a need to repeat this requirement within this policy.
Concerned that this policy will result in more concentration of these uses in neighbouring areas like Harlesden. This consequence needs to be mitigated against in consultation with LBB and Harlesden Neighbourhood Forum and this need for mitigation in neighbouring areas should be reflected in supporting text.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Brent Council is responsible for producing planning policy for Harlesden. Brent Council has its own policy to control hot food takeaways in Brent.

Summary of Relevant Evidence Base

Supporting Study	Recommendations
Healthy Town Centres Study	• The Local Plan should look to restrict takeaways around schools in the area. No new hot food takeaways should be permitted within 400m of an existing or permitted secondary school or within 200m of an existing or permitted primary school. • Policy should seek to avoid an overconcentration of hot food takeaways in town centres. The policy should look to limit the overall percentage of frontage and the proximity of takeaways to one another. Based on a review of other boroughs and

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	concentrations within the OPDC, a limit of 6% of frontage is suggested and a policy requiring no less than two non-A5 units between takeaways. • Policy should limit new betting shops, pawnbrokers, payday loan stores and games arcades so that they result in no more than one betting shop, pawnbroker, payday loan store or games arcade within 400m walking distance of the same use
Retail and Leisure Needs Study	• A series of policies should be put in place to ensure a high quality of retail that supports placemaking, including the support for independent retailers, measures to mitigate impacts on existing town centres and support for meanwhile uses • Findings from case studies note the importance of meanwhile or 'pop-up' uses to the early place-making and activation of the area and the planning policy should look to support such uses (para 7.4.8)

Rationale for any non-implemented recommendations

Supporting Study	**Recommendations**	Rationale for not including
N/A	N/A	N/A

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TCC3: A-Class Uses

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
23	Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should: ● recognise town centres as the heart of their communities and pursue policies to support their viability and vitality; ● promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres; ● retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive; ● allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites; ● set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres;
26	When assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500 sq m). This should include assessment of: • the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and • the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.
70	To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: • plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments; • guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its

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	day-to-day needs;
156	Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver the provision of retail, leisure and other commercial development.
161	Local planning authorities should use this evidence base to assess: • the needs for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development;

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Ensuring the Vitality of Town Centres	
Title: What is the impact test? **Paragraph:** 013 **Reference ID:** 2b-003-20140306 **Revision Date:** 06 03 2014	The purpose of the test is to ensure that the impact over time (up to 5 years (10 for major schemes)) of certain out of centre and edge of centre proposals on existing town centres is not significantly adverse. The test relates to retail, office and leisure development (not all main town centre uses) which are not in accordance with an up to date Local Plan and outside of existing town centres. It is important that the impact is assessed in relation to all town centres that may be affected, which are not necessarily just those closest to the proposal and may be in neighbouring authority areas.
Title: How should the impact test be used in plan-making? **Paragraph:** 014 **Reference ID:** 2b-014-20140306 **Revision Date:** 06 03 2014	If the Local Plan is based on meeting the assessed need for town centre uses in accordance with the sequential approach, issues of adverse impact should not arise. The impact test may be useful in determining whether proposals in certain locations would impact on existing, committed and planned public and private investment, or on the role of centres.
Title: When should the impact test be used? **Paragraph:** 016 **Reference ID:** 2b-016-20140306 **Revision Date:** 06 03 2014	The impact test only applies to proposals exceeding 2,500 square metres gross of floorspace* unless a different locally appropriate threshold is set by the local planning authority. In setting a locally appropriate threshold it will be important to consider the: • scale of proposals relative to town centres • the existing viability and vitality of town centres • cumulative effects of recent developments • whether local town centres are vulnerable • likely effects of development on any town centre strategy • impact on any other planned investment As a guiding principle impact should be assessed on a like-for-like basis in respect of that particular sector (eg it may not be

	appropriate to compare the impact of an out of centre DIY store with small scale town-centre stores as they would normally not compete directly). Retail uses tend to compete with their most comparable competitive facilities. Conditions may be attached to appropriately control the impact of a particular use. Where wider town centre developments or investments are in progress, it will also be appropriate to assess the impact of relevant applications on that investment. Key considerations will include: • the policy status of the investment (ie whether it is outlined in the Development Plan) • the progress made towards securing the investment (for example if contracts are established) • the extent to which an application is likely to undermine planned developments or investments based on the effects on current/ forecast turnovers, operator demand and investor confidence

London Plan (2016) Policies

Policy / paragraph reference	**Policy and paragraph text**
Policy 2.15 Town Centres	D Boroughs should: • a(i) sustain and enhance the vitality and viability of centres in the context of the clauses set out below • a1 ensure that local retail capacity requirements take realistic account of changes in consumer expenditure and behaviour including the impact of internet and multi-channel shopping within the context of broader strategic assessments of retail need • a2 in light of local and strategic capacity requirements (Policy 4.7), identify town centre boundaries, primary shopping areas, primary and secondary frontages in LDF proposals maps and set out policies for each type of area in the context of Map 2.6 and Annex 2 • b in co-ordination with neighbouring authorities and the Mayor, relate the existing and planned roles of individual centres to the network as a whole to achieve its broader objectives • c proactively manage the changing roles of centres, especially those with surplus retail and office floorspace, considering the scope for consolidating and strengthening them by encouraging a wider range of services; promoting diversification, particularly through high density, residential-led, mixed use re-development; improving environmental quality; facilitating site assembly, including through the Compulsory Purchase process and revising the extent and/or flexibility for non-A1 retail uses in secondary shopping frontage policies • c1 improve Londoners' access to new and emerging forms of retail provision by realising the potential of the more attractive, generally larger town centres for planned re-development as competitive destinations which provide multi-channel shopping facilities and complementary activities including significant, higher density housing in a high quality environment

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	• c2 actively plan and manage the consolidation and redevelopment of other, mainly medium sized centres and, where relevant other secondary frontages, to secure a sustainable, viable retail offer; a range of non-retail functions to address identified local needs; and significant, higher density housing in a high quality environment • c3 ensure that neighbourhood and more local centres provide convenient access, especially by foot, to local goods and services needed on a day to day basis; that they enhance the overall attractiveness of local neighbourhoods and serve as foci for local communities; and that surplus commercial capacity is identified and brought forward to meet housing and local community needs, recognising that this process should contribute to strengthening the 'offer' of the centre as a whole
Policy 4.7 Retail and Town Centre Development	C In preparing LDFs, boroughs should: • a) identify future levels of retail and other commercial floorspace need (or where appropriate consolidation of surplus floorspace – see Policy 2.15) in light of integrated strategic and local assessments
Policy 4.8 Supporting a Successful and Diverse Retail Sector and Related Facilities and Services	B LDFs should take a proactive approach to planning for retailing and related facilities and services and: • a bring forward capacity for additional comparison goods retailing particularly in International, Metropolitan and Major centres • b support convenience retail particularly in District, Neighbourhood and more local centres, to secure a sustainable pattern of provision and strong, lifetime neighbourhoods (see Policy 7.1) • c provide a policy framework for maintaining, managing and enhancing local and neighbourhood shopping and facilities which provide local goods and services, and develop policies to prevent the loss of retail and related facilities that provide essential convenience and specialist shopping or valued local community assets, including public houses, justified by robust evidence • d identify areas under-served in local convenience shopping and services provision and support additional facilities at an appropriate scale in locations accessible by walking, cycling and public transport to serve existing or new residential communities • e support the range of London's markets, including street, farmers' and, where relevant, strategic markets, complementing other measures to improve their management, enhance their offer and contribute to the vitality of town centres • f support the development of e-tailing and more efficient delivery systems • g manage clusters of uses having regard to their positive and negative impacts on the objectives, policies and priorities of the London Plan including a centre's: o broader vitality and viability (Policy 2.15Ca) o broader competitiveness, quality or diversity of offer (Policy 2.15Cc) o sense of place or local identity (Policy 2.15Ac) o community safety or security (Policy 2.15Cf) o success and diversity of its broader retail sector (Policy 4.8A) o potential for applying a strategic approach to transport and land use planning by increasing the scope for "linked trips" (Policy 6.1)

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	o role in promoting health and well-being (Policy 3.2D) o potential to realise the economic benefits of London's diversity (paragraph 3.3).
Policy 4.9 Small Shops	B In LDFs, Boroughs should develop local policies where appropriate to support the provision of small shop units.

Draft New London Plan (2017) Policies

Policy / paragraph reference	**Policy and paragraph text**
Chapter 2 Spatial Development Patterns	
Policy SD7 Town centre network	B Identified deficiencies in the London town centre network can be addressed by promoting centres to function at a higher level in the network, designating new centres (see Annex 1) or reassessing town centre boundaries (see Policy SD8 Town centres: development principles and Development Plan Documents). Centres with current or projected declining demand for commercial, particularly retail, floorspace may be reclassified at a lower level in the hierarchy. E District centres should focus on the consolidation of a viable range of functions, particularly convenience retailing, leisure, local employment and workspace, whilst addressing the challenges of new forms of retailing and securing opportunities to realise their potential for higher density mixed-use residential development and improvements to their environment. F Local and neighbourhood centres should focus on providing convenient and attractive access by walking and cycling to local goods and services needed on a day-to-day basis.
Policy SD8 Town centres: development principles and Development Plan Documents	A Development Plans and development proposals should take a town centres first approach by: 1) adopting a sequential approach to accommodating town centre uses including retail, commercial, offices, leisure, entertainment, culture, tourism and hotels such that new development of these uses is focused on sites within town centres or (if no sites are available, suitable or viable) on sites on the edges of centres that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport 2) firmly resisting out-of-centre development of town centre uses in line with the sequential approach in A(1) above, with limited exceptions for existing viable office locations in outer London (see Policy E1 Offices) 3) providing an impact assessment on proposals for new, or extensions to existing, edge or out-of-centre development for town centre uses in part A(1) above that are not in accordance with the Development Plan 4) realising the full potential of existing out of centre retail and leisure parks to deliver housing intensification through redevelopment and ensure such locations become more sustainable in transport terms, by securing improvements to public transport, cycling and walking. This should not result in a net increase in retail or leisure floorspace in an out-of-centre location having regard to parts A(1), (2) and (3) above. B In Development Plans, boroughs should: 1) define the detailed boundary of town centres in policy maps including

	the overall extent of the town centre (taking into consideration associated high streets which have particular economic or social value) along with specific policy-related designations such as primary shopping areas, primary and secondary frontages and night-time economy in light of demand/capacity assessments for town centre uses and housing 2) develop policies through strategic and local partnership approaches (Policy SD9 Town centres: Local partnerships and implementation) to meet the objectives for town centres set out in Policy SD6 Town centres to support the development, intensification and enhancement of each centre, having regard to the current and potential future role of the centre in the network (Policy SD7 Town centre network) 3) develop policies for the edge and fringes of town centres, revising the extent of shopping frontages where surplus to forecast demand and introducing greater flexibility, permitting a range of non-residential uses particularly in secondary frontages taking into account local circumstances 4) identify centres that have particular scope to accommodate new commercial development and higher density housing, having regard to the growth potential indicators for individual centres in Annex 1. Criteria to consider in assessing the potential for intensification in town centres include: a) assessments of demand for retail, office and other commercial uses b) assessments of capacity for additional housing c) public transport accessibility and capacity d) planned or potential transport improvements – to indicate future capacity for intensification e) existing and potential level of density of development and activity f) relationship with wider regeneration initiatives g) vacant land and floorspace – as a further measure of demand and also of under-utilisation of the existing centre h) potential to complement local character, existing heritage assets and improve the quality of the town centre environment i) viability of development. 5) identify sites suitable for higher density mixed-use residential intensification capitalising on the availability of services within walking and cycling distance and current and future public transport provision including, for example: a) comprehensive redevelopment of low-density supermarket sites, surface car parks, and edge of centre retail/leisure parks b) redevelopment of town centre shopping frontages that are surplus to demand c) redevelopment of other low-density town centre buildings that are not of heritage value, particularly where there is under-used space on upper floors, whilst re-providing non-residential uses d) delivering residential above existing commercial, social infrastructure and transport infrastructure uses or re-providing these uses as part of a mixed-use development. 6) support flexibility for temporary or ‘meanwhile’ uses of vacant properties. C Development proposals should: 1) ensure that commercial floorspace relates to the size and the role and function of a town centre and its catchment 2) ensure that commercial space is appropriately located having regard

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	to Part A above, fit for purpose, with at least basic fit-out and not compromised in terms of layout, street frontage, floor to ceiling heights and servicing, and marketed at rental levels that are related to demand in the area or similar to surrounding existing properties 3) support efficient delivery and servicing in town centres including the provision of collection points for business deliveries in a way that minimises negative impacts on the environment, public realm, the safety of all road users, and the amenity of neighbouring residents 4) support the diversity of town centres by providing a range of commercial unit sizes, particularly on larger-scale developments.
Chapter 6 Economy	
Policy E5 Strategic Industrial Locations (SIL)	D Development proposals for uses in SILs other than those set out in part C above, (including residential development, retail, places of worship, leisure and assembly uses), should be refused except in areas released through a strategically co-ordinated process of SIL consolidation. This release must be carried out through a planning framework or Development Plan document review process and adopted as policy in a Development Plan or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough.
Policy E9 Retail, markets and hot food takeaways	A A successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported in line with the wider objectives of this Plan, particularly for town centres (Policy SD6 Town centres, Policy SD7 Town centre network, Policy SD8 Town centres: development principles and Development Plan Documents and Policy SD9 Town centres: Local partnerships and implementation). B In Development Plans, boroughs should: 1) identify future requirements and locations for new retail development having regard to the town centre policies in this Plan and strategic and local evidence of demand and supply 2) identify areas for consolidation of retail space where this is surplus to requirements 3) bring forward capacity for additional comparison goods retailing particularly in International, Metropolitan and Major town centres 4) support convenience retail in all town centres, and particularly in District, Local and Neighbourhood centres, to secure inclusive neighbourhoods and a sustainable pattern of provision where there is less need to travel 5) provide a policy framework to enhance local and neighbourhood shopping facilities and prevent the loss of retail and related facilities that provide essential convenience and specialist shopping 6) identify areas under-served in local convenience shopping and related services and support additional facilities to serve existing or new residential communities in line with town centre Policy SD8 Town centres: development principles and Development Plan Documents 7) support the range of London's markets, including street markets, covered markets, specialist and farmers' markets, complementing other measures to improve their management, enhance their offer and contribute to the vitality of town centres and the Central Activities Zone 8) manage existing edge of centre and out of centre retail (and leisure) by encouraging comprehensive redevelopment for a diverse mix of uses in line with Policy SD6 Town centres, Policy SD7 Town centre

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	network, Policy SD8 Town centres: development principles and Development Plan Documents and Policy SD9 Town centres: Local partnerships and implementation to realise their full potential for housing intensification, reducing car use and dependency, and improving access by walking, cycling and public transport 9) manage clusters of retail and associated uses having regard to their positive and negative impacts on the objectives, policies and priorities of the London Plan including: a) town centre vitality, viability and diversity b) sustainability and accessibility c) place-making or local identity d) community safety or security e) mental and physical health and wellbeing. E Large-scale commercial development proposals (containing over 2,500 sqm gross A Class floorspace) should support the provision of small shops and other commercial units (including affordable units where there is evidence of local need). F Development proposals involving the redevelopment of surplus retail space should support other planning objectives and include alternative town centre uses on the ground floor where viable (and in accordance with town centre Policy SD8 Town centres: development principles and Development Plan Documents) and residential development.

Mayor's Town Centres SPG

Policy / paragraph reference	**Policy and paragraph text**
SPG Implementation (Summary) Promoting Vibrant and Viable Town Centres	Boroughs and town centre partners are encouraged to: • a promote strong, successful, vibrant and viable town centres • b develop their role as the hub of the community, providing a sense of place and identity and contributing to healthy and lifetime neighbourhoods • c recognise the opportunities and challenges from changes in consumer behaviour and the growth of internet and multi-channel retailing • d support the evolution and diversification of town centres using London Plan policy to support a range of uses and activities to meet the challenges they face • e promote flexible, adaptable and resilient town centres • l implement the London Plan 'town centres first' approach
SPG implementation 1.1	Boroughs and town centre partners are encouraged to: • a) Promote a viable and diverse mix of retailing including independents, multiples and specialist provision to meet identified and projected needs • b) Assess the realistic level of demand for new and reconfigured retail floorspace in local retail capacity studies having regard to: consumer expenditure projections (comparison and convenience goods); demographic projections; up-to-date estimates of growth in on-line and multi-channel retailing; improvements to the productivity

	of retail floorspace; the committed pipeline of retail floorspace development; and the role and function of town centres • d) Reconcile local assessments of retail demand with the latest strategic London-wide assessment for comparison goods retail • e) Develop proactive local plans and policies to accommodate projected demand for retail floorspace (including improvement in quality of space) through mixed use redevelopment within primary or viable secondary town centre frontages or on well integrated edge of centre sites • h) define primary shopping areas, primary and secondary frontages in Local Plans
SPG 3.4 Small Shops	Boroughs and town centre partners are encouraged to: a identify whether there is a local need for affordable small shops b develop local policies where appropriate and clarify: • local policy objectives • the definition of small shops and the large retail development floorpsace threshold at which the policy applies • expected outcomes (for example on-site or off-site provision or financial contributions) • how the financial contributions would be spent and v) other matters such as eligible uses, eligible occupiers, affordability, ownership and monitoring.
SPG Implementation 6.1 Town Centre Strategies and Management	Boroughs and town centre partners are encouraged to: • a put in place a strong vision and strategy in place for each town centre, including local and neighbourhood centres • b ensure that the range of town centre constituencies of interest is taken into account as part of a collaborative approach • c support effective town centre management to co-ordinate action.
SPG Implementation 6.3 Sequential Approach, Impact Tests and Town Centre Development	Boroughs and other town centre partners should: • b) undertake impact assessments in line with the NPPF and practice guidance taking into account London's unique circumstances and retail floorspace in the planning pipeline including that in neighbouring boroughs and outside London where appropriate

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	**Policy and paragraph text**
9.45	1. Identify OPDC as amore significant retail destination with a higher quantum of retail over and above that required to serve the needs of the development. 9.45 This option would have potential benefits in terms of placemaking, by creating a greater retail draw and providing more opportunities for active uses. However, this option could impact on the vitality and viability of surrounding retail centres and as a consequence, this policy approach has not been identified as the preferred option.

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Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Phasing: The plan needs to set out clearer controls around the phasing of retail to ensure that it's viable and does not detrimentally impact on nearby centres. The quantum of need should also be broken down and distributed across Old Oak with one stakeholder arguing that the main hub of the centre should be north of the canal	Brent Council, Old Oak Park (DP9)	Change proposed. Policy TCC3 requires the delivery of A-class uses to be phased so that they are delivered in accordance with the demand created by new homes and jobs. Officers propose to continue to identify Old Oak High Street as a potential major centre. The draft Retail and Leisure Needs Study identifies the need in the centre to provide over 50,000sqm of A-class uses alone, which puts it within the Major Town Centre bracket in Annex 2 of the London Plan. This does not account for the floorspace requirements for culture, sports, leisure and community uses. The Local Plan identifies that this should be spread across a number of places. The Town Centre will be focussed on the High Street, which runs north-south through the site. The largest concentration would be closest to the HS2 station in Old Oak South. North of the canal in Old Oak North, the town centre would provide for a more local need.
Impact Assessments: Some stakeholders argued that the threshold of 5,000sqm and 2,500sqm for a retail impact assessment is too high and not appropriate, whilst others argued that as quantums had already been tested in the Retail and Leisure Needs Study, impact assessments should only be required for schemes that exceed the quantums within the study.	Brent Council, Grand Union Alliance, Old Oak Park (DP9), Royal Borough of Kensington and Chelsea	No change proposed. The Retail and Leisure Needs Study has assessed the impact of town centre uses on designated centres and identified appropriate mitigation measures to ensure that impacts are minimised. These measures have been incorporated into the Local Plan's policies. The thresholds identified in the Retail and Leisure Study and Local Plan accord with the threshold in the NPPF, but goes beyond these requirements by also identifying that the impact assessments would also be required within designated centres, as these

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		are emerging, as not yet established centres. OPDC considers this approach will ensure that impacts on existing designated centres are appropriately mitigated. The Retail and Leisure Needs Study identifies that as 3 out of the 4 proposed town centres within the OPDC area were not designated centres prior to this Local Plan, it is sensible to still require impact assessments to ensure that impacts on existing designated centres are minimised.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Table 10.1 should be included in the policy and proposals should be required to accord with this quantitative need.	Brent Council	No change proposed. As noted in the supporting text to Policy TCC3, the figures in Table 10.1 are estimates based on current development capacity figures, population projections and estimates of expenditure retention. The policy requires that regard is had to the most up-to-date Retail and Leisure Needs Study and its recommended distribution of A-class floorspace across the area.
Not sure how the 5,000sqm threshold for impact assessments has been arrived at. It is considered as a maximum the threshold should be 2,500sqm, reflective of the default standard in the NPPF.	Brent Council, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The rationale for the 5,000sqm threshold is set out in the Retail and Leisure Needs Study. The Old Oak Major Town centre is a new town centre. If in existence, no impact assessment would be required, but the Study identifies that as the centre has not yet been delivered it is appropriate to still require impact assessments. The Study has assessed the broad impact of a new centre on the surrounding town centre hierarchy and this has shown that most impacts are likely to be positive as a consequence of the ability of surrounding centres to capture spend from the new population moving to the area.

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
Support the broad aim to promote small units but should not stipulate a % target	Old Oak Park Ltd	No change proposed. OPDC considers it appropriate to set a clear target for the delivery of small units, to support the establishment of independents and start-ups and to add variety, vibrancy and vitality to the centre. OPDC considers the approach sound, in that it is justified by evidence and the inclusion of a target is an effective way of securing delivery.
Broadly quantitative provision figures in table 10.1	Royal Borough of Kensington and Chelsea	Noted.
Support threshold of 5,000sqm for Town Centre Uses Statement in Old Oak High Street major town centre	Royal Borough of Kensington and Chelsea	Noted.
Support wording in para 10.22 for greater need of scrutiny of town centre uses in emerging town centres.	Royal Borough of Kensington and Chelsea	Noted.
Support threshold of 2,500sqm for town centre uses elsewhere	Royal Borough of Kensington and Chelsea	Noted.
Support Policy TCC3	Friary Park Preservation Group	Noted.
Policy TCC3 is unsound (no reasons given)	Chris Billington	No change proposed. No reasons are given as to why the policy is considered unsound.
Do not support trying to have predominantly A1 uses in primary shopping areas. This can result in multiple vacancies. A more flexible approach should be adopted, as has been adopted for shopping parades in the St. Quintin and Woodland Neighbourhood Plan.	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC considers it appropriate to specify that shop units should be focussed within primary shopping areas as these units tend to generate the greatest footfall and benefit from clustering, particularly for comparison trade. Neighbourhood Town Centres are much larger than shopping parades and in accordance with the NPPF, OPDC considers it appropriate to define primary shopping areas and that these should be the focus for A1 shops.
The policy is not sound as it does not solely deal with A-class uses. It does not have an implementation strategy so is not effective. It is not positively prepared as it does not reflect evidence base and mention the potential negative impact on Harlesden in the RLNS	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The elements dealing with 'town centre' uses which could also include non A-class uses has been relocated to Policy TCC1. OPDC considers that the elements that remain in the policy are sound and effective.

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
This strand of the policy should be relocated to TCC1 as it does not solely relate to A-class uses.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. This has been relocated to Policy TCC1.
Special consideration should be given to the retail uses planned for the Willesden Junction place, Hythe Road and Scrubs Lane, which will be in close proximity to Harlesden	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The specific occupiers of A1 premises within a use class cannot be controlled through the planning system, although the requirement to submit a vision statement as part of a Town Centre Uses Statement is so that OPDC and stakeholders are able to broadly understand the types of uses that may be located within the OPDC area. The Retail and Leisure Needs Study identifies that Harlesden Centre will undergo growth over the next 20 years, both as a result of background growth, and also as a result of expenditure from the OPDC area. Within OPDC's Retail and Leisure Needs Study, estimates for floorspace provision within the OPDC area have been made on the basis of 80% retention of convenience expenditure and 20% retention of comparison expenditure, meaning there will be significant opportunities for Harlesden to capture this growth.

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
The character of retail uses in Old Oak North and Willesden Junction could negatively impact on Harlesden Town Centre. As such a lower threshold for retail impact assessments in areas of Old Oak North should be incorporated	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The impact of a quantitive provision of over 60,000sqm of A-class floorspace has already been assessed as part of OPDC's Retail and Leisure Needs Study and this has shown that Harlesden Town Centre is set to benefit from the expenditure arising from residents and workers in Old Oak. OPDC requires schemes meeting the thresholds outlines in TCC1 to contribute, where appropriate, to measures that will support the continuing vitality and viability of Harlesden District Centre to explore how these benefits can be appropriately captured. OPDC does not consider it appropriate to lower these thresholds. The rationale for the 5,000sqm threshold is set out in the Retail and Leisure Needs Study. The Old Oak Major Town centre is a new town centre. If in existence, no impact assessment would be required, but the Study identifies that as the centre has not yet been delivered it is appropriate to still require impact assessments.
There is no policy that requires individual development proposals not to have an unacceptable impact, either by themselves of cumulatively with other developments, upon existing town centres. Policy should state that where it is likely to have a significant adverse impact on the vitality and viability of an existing centre it will be refused.	Grand Union Alliance, Harlesden Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. To make it clearer that the requirements of TCC1 are to avoid significant adverse impacts to OPDC's and the surrounding town centre hierarchy, this has been added to the lead in text to Policy TCC1. The Retail and Leisure Needs Study has looked at the impact of proposed levels of A-class floorspace provision on the surrounding town centre hierarchy and this has shown that the impact is likely not be adverse and that there are significant opportunities for surrounding centres to capture trade from the new population in the OPDC area. The NPPF requirement for impact assessments is to look at existing, committed and planned proposals and therefore, recognises the need to consider impacts cumulatively with other

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
		committed or planned proposals. Reference to this has been included in the supporting text.
If cumulative individual and smaller applications will have a significant effect on Harlesden and other neighbouring centres, provision for an impact assessment across co-located or multiple-site applications should be made. Policy TCC1 should state that development proposals should not have an unacceptable impact, either by themselves of cumulatively with other developments, upon existing town centres.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. While it was part of PPS4, the NPPF doesn't have a cumulative impact test, requiring schemes below locally set impact assessment thresholds to submit impact assessments. There's a requirement for schemes over the default threshold to take account of cumulative developments in testing impact, but if the scheme is under the threshold in the first place, there is no cumulative trigger for undertaking an assessment. OPDC therefore considers the policy approach sound and consistent with the NPPF.
An early published version of the RLNS, in February 2016, concluded that there was a threat to Harlesden based on a total new A Class floorspace in the OPDC area of 64,100 sq metres up to 2037. The total new A Class floorspace has now risen to 68,500 sq metres in the latest published version of the Study (Nov 2016). This impact is now surely greater.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The impact assessments in the Retail and Leisure Needs Study have been updated to assess the impact with the revised development projections within an addendum. However, the figures have subsequently been further updated in the Retail and Leisure Needs Study addendum and the figures have subsequently returned to 64,500sqm. The impacts on centres have been assessed and this has shown that there is significant potential for the surrounding hierarchy to capture trade from spend arising from the new population within the OPDC area.

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
Need to set out how the diagrams showing active frontage are reflected in the estimates of town centre floorspace.	Grand Union Alliance, Harlesden Neighbourhood Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Active frontages do not solely relate to A-class uses - they can include other town centre uses. The annex of the Local Plan notes that figures (maps) in the Local Plan are indicative.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Retail and Leisure Needs Study	• There is a quantitative need for approximately 68,500sqm of A-class uses in the OPDC area in the Local Plan period (the next 20 years). • Within the plan period, 57,250sqm of A-class uses should be provided in the new Old Oak High Street Major Town Centre, with 4,750sqm in North Acton, 3,500sqm in Atlas Junction and 3,000sqm in Park Royal Centre • A series of policies should be put in place to ensure a high quality of retail that supports placemaking, including the support for independent retailers, measures to mitigate impacts on existing town centres and support for meanwhile uses.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
N/A	N/A	N/A

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TCC4: Social Infrastructure

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
23	Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should: allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites;
70	To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: • plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments; • guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs; • ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.
72	The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: • give great weight to the need to create, expand or alter schools; and • work with schools promoters to identify and resolve key planning issues before applications are submitted
156	Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver the provision of health, security, community and cultural infrastructure and other local facilities;
162	Local planning authorities should work with other authorities and providers to: • assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands;

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National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Health and Wellbeing	
Title: What are the links between health and planning? **Paragraph:** 002 **Reference ID:** 53-002-20140306 **Revision Date:** 06 03 2014	The range of issues that could be considered through the plan-making and decision-making processes, in respect of health and healthcare infrastructure, include how: • the local plan promotes health, social and cultural wellbeing and supports the reduction of health inequalities; • the healthcare infrastructure implications of any relevant proposed local development have been considered • access to the whole community by all sections of the community, whether able-bodied or disabled, has been promoted.

London Plan (2016) Policies

Policy / paragraph reference	Policy and paragraph text
Chapter 2 London's Places	
Policy 2.15 Town Centres	D Boroughs should: • c3) ensure that neighbourhood and more local centres provide convenient access, especially by foot, to local goods and services needed on a day to day basis; that they enhance the overall attractiveness of local neighbourhoods and serve as foci for local communities; and that surplus commercial capacity is identified and brought forward to meet housing and local community needs, recognising that this process should contribute to strengthening the 'offer' of the centre as a whole
Chapter 3 London's People	
Policy 3.1 Ensuring Equal Life Chances for All	Planning decisions B Development proposals should protect and enhance facilities and services that meet the needs of particular groups and communities. Proposals involving loss of these facilities without adequate justification or provision for replacement should be resisted. LDF preparation C In preparing DPDs, boroughs should engage with local groups and communities to identify their needs and make appropriate provision for them, working with neighbouring authorities (including on a subregional basis) as necessary. D Boroughs may wish to identify significant clusters of specific groups (such as those who experience particular disadvantage and social exclusion) and consider whether appropriate provision should be made to meet their particular needs such as cultural facilities, meeting places or places of worship.

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Policy 3.16 Protection and Enhancement of Social Infrastructure	D LDFs should provide a framework for collaborative engagement with social infrastructure providers and community organisations: • a for the regular assessment of the need for social infrastructure at the local and sub-regional levels; and • b to secure sites for future provision or reorganisation of provision. Where appropriate, boroughs are encouraged to develop collaborative cross-boundary approaches in the provision and delivery of social infrastructure. E Boroughs should ensure that adequate social infrastructure provision is made to support new developments. If the current use of a facility is no longer needed, boroughs should take reasonable steps to identify alternative community uses where the needs have been identified. Adequate provision for social infrastructure is particularly important in areas of major new development and regeneration and should be addressed in opportunity area planning frameworks and other relevant area action plans.
Policy 3.17 Health and Social Care Facilities	LDF preparation D In LDFs boroughs should identify and address significant health and social care issues facing their area for example by utilising findings from Joint Strategic Needs Assessments. E Boroughs should ensure their public health team work with the local NHS, social care services and community organisations to: • a regularly assess the need for health and social care facilities at the local and sub-regional levels; and • b secure sites and buildings for, or to contribute to, future provision. F Boroughs should promote the continued role and enhancement of London as a national and international centre of medical excellence and specialised facilities.
Policy 3.18	H LDFs and related borough strategies should provide the framework: • a) for the regular assessment of the need for childcare, school, higher and further education institutions and community learning facilities at the local and sub-regional levels; and • b) to secure sites for future provision recognising local needs and the particular requirements of the education sector. I Boroughs should support and maintain London's international reputation as a centre of excellence in higher education.
Chapter 7 London's Living Spaces and Places	
Policy 7.1 Lifetime Neighbourhoods	F Boroughs should plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities. Cross-borough and/or sub-regional working is encouraged, where appropriate. G Boroughs should work with and support their local communities to set goals or priorities for their neighbourhoods and strategies for achieving them through neighbourhood planning mechanisms.

Draft London Plan (2017) Policies

Policy /	**Policy and paragraph text**

paragraph reference	
Chapter 1 Planning London's Future (Good Growth Policies)	
Policy GG1	To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must: B Provide access to good quality services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation. D Promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction during the daytime, evening and night time.
Chapter 2 Spatial Development Patterns	
Policy SD1 Opportunity Areas	B: Boroughs, through Development Plans and decisions, should: 3) plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary
Policy SD6 Town Centres	A: London's varied town centres and their vitality and viability should be promoted and enhanced as: 1) strong, resilient, accessible, inclusive and viable hubs for a diverse • range of uses including employment, business space, shopping, culture, leisure, night-time economy, tourism, civic, community, social infrastructure and residential development I: The provision of social infrastructure should be enhanced, and facilities should be located in places that maximise footfall to surrounding town centre uses.
Policy SD8 Town Centres: development principles and Development Plan Documents	B In Development Plans, boroughs should: 5) identify sites suitable for higher density mixed-use residential intensification capitalising on the availability of services within walking and cycling distance and current and future public transport provision including, for example: • d) delivering residential above existing commercial, social infrastructure and transport infrastructure uses or re-providing these uses as part of a mixed-use development.
Chapter CC	
Policy D6 Optimising Housing Density	B The capacity of existing and planned physical, environmental and social infrastructure to support new development should be assessed and, where necessary, improvements to infrastructure capacity should be planned to support growth. • 1) The density of development proposals should be based on, and linked to, the provision of future planned levels of infrastructure rather than existing levels. • 2) The ability to support proposed densities through encouraging active travel should be taken into account. • 3) Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean, in exceptional circumstances, that development is contingent on the provision of the necessary infrastructure and public transport services and that the development is phased accordingly.

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Policy S1 Developing London's social infrastructure	A Boroughs, in their Development Plans, should undertake a needs assessment of social infrastructure to meet the needs of London's diverse communities. B In areas of major new development and regeneration, social infrastructure needs should be addressed via area-based planning such as Opportunity Area Planning Frameworks, Area Action Plans, Development Infrastructure Funding Studies, Neighbourhood Plans or master plans. C Development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported. D Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities. E New facilities should be easily accessible by public transport, cycling and walking. F Development proposals that would result in a loss of social infrastructure in an area of defined need should be refused unless: • there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood, or; • the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities in order to meet future population needs or to sustain and improve services. G Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered.
Policy S2 Health and social care facilities	A Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to: 1) identify and address local health and social care needs within Development Plans taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies 2) understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision in order to maximise health and care outcomes 3) regularly assess the need for health and social care facilities locally and sub-regionally, addressing borough and CCG cross-boundary issues 4) identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision 5) identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses. B Development proposals that support the provision of high-quality new and enhanced facilities to meet identified need and new models of care should be supported. C New facilities should be easily accessible by public transport, cycling and walking.
Policy S3 Education and childcare facilities	A To ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice, boroughs should:

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	1) identify and address local needs and any shortages in supply, both locally and sub-regionally, including cross-boundary issues 2) identify sites for future provision through the Local Plan process, particularly in areas with significant planned growth and/or need 3) ensure that development proposals for housing and commercial facilities incorporate suitable childcare provision and encourage nursery provision within primary schools, where there is a need.

Mayor of London's Social Infrastructure SPG

Policy / paragraph reference	**Policy and paragraph text**
Chapter 3	Local planning authorities should plan for social infrastructure provision by undertaking assessments that include the following 5 stages: 1. Stakeholder engagement and policy assessment 2. Identifying existing social infrastructure 3. Identifying future needs and requirements 4. Identifying funding and delivery mechanisms 5. Modifying or delivering infrastructure to meet lifetime neighbourhoods criteria 6. Monitoring and review
SPG Implementation Point 1	In implementing London Plan policies and especially Policy 7.1, the Mayor will, and boroughs and other partners are advised to: • Co-ordinate the evaluation of needs and the assignment of actions to meet these needs consistently across local plan documents, social infrastructure delivery strategies, and neighbourhood plans.
SPG Implementation Point 2	In implementing London Plan policies and especially Policy 3.2, and Policy 3.16, the Mayor will, and boroughs and other partners are advised to: • Plan across services to ensure that identified demographic needs are addressed within local plans and supported by necessary health infrastructure. • consider both the impact of health needs on development and the impact of development on health needs. • Consider the possibilities for development plans in Opportunity Areas to improve health outcomes and facilities particularly where these coincide with areas of multiple deprivation • evaluate the loss of existing health assets in light of any agreed programmes of reprovision with the overall goal of ensuring continued delivery of social infrastructure and related services. Consider the location of facilities and their accessibility to their client groups. • Consider the location of facilities and their accessibility to their client groups
Implementation Point 3	In implementing London Plan policies, especially Policy 3.18, the Mayor will, and boroughs and other partners are advised to: • Plan across services to ensure that identified demographic needs are addressed within local plans and that the provision of education facilities complements as far as possible the broader objectives of the plan Encourage the development of new schools and plan to meet the demographic demand for new schools and existing unmet need. • Give full and thorough consideration to the importance of enabling the

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	development of state-funded schools in their planning decisions. • -Apply through conditions any provisions necessary to make schools acceptable in planning terms. • -Ensure that schools are sustainable (this includes the provision of food, the use of energy, the disposal of waste and the travel involved in getting to the location) and meet the principles of inclusive design
SPG Implementation Point 7	Boroughs are advised to: • Maintain an up-to-date list of local demand for community facilities, considering the possibility of a single list of Assets of Community Value, non-designated heritage assets, and identified need for community facilities • Encourage local groups and neighbourhood fora to identify and prioritise their needs for different forms of community facilities. • Engage with development proposals which offer opportunities for the development of community facilities, particularly where the development plan identifies a need for new or replacement provision. • Encourage the registration of community facilities as assets of community value to provide proof of their importance in the determination of local planning applications • Encourage co-located and multi-use facilities, particularly where these can help to minimise capital or revenue costs to community groups • Build upon the provisions in Policy 3.16 that set out a policy framework for the management of community facilities through the planning process, and which support the use of other powers and opportunities set out in the Localism Act

Mayor of London's Town Centre's SPG

Policy / paragraph reference	**Policy and paragraph text**
SPG Implementation 1.5 Social Infrastructure, Civic and Community Services,	Boroughs and town centre partners are encouraged to: a) consider the potential to relocate social infrastructure and public facilities to town centres as opportunities arise b) support the multiple use of premises/ co-location of social infrastructure, civic and community services with commercial facilities to reduce management and maintenance costs, improve the quality of service and offer visitors a wider range of choice and services (e.g. post office functions in retail outlets) c) resist loss of infrastructure and maximise the usage of existing facilities d) identify locations, sites or buildings, and financial contributions for new provisions including as part of mixed use development with housing e) identify alternative community uses (where needs have been identified) when facilities are no longer needed in their existing use f) consider improvement to social infrastructure as a catalyst for town centre regeneration g) have regard to guidance on how to carry out social infrastructure needs assessments in the Mayor's draft Social Infrastructure SPG and Housing SPG.

Local Plan Regulation 18 Draft Policy Options

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Policy / paragraph reference	Policy and paragraph text
Policy SI2 Education 10.17	1. Do not promote the OPDC area as a location for higher education uses 10.17 Instead of promoting higher educational uses to the area, this approach would instead take a more flexible approach and proposals would be assessed on a case by case basis. This approach would not preclude the provision of higher educational uses in the OPDC area. However, as London's largest development site, OPDC thinks it is right to identify the potential for the OPDC area to accommodate higher educational uses and the positive role it could play in supporting regeneration.
Policy SI3 Health 10.24	10.24 No reasonable alternative policy options have been identified, as it is considered that an alternative approach to that outlined in the preferred policy option would not be in conformity with the NPPF, London Plan or draft supporting evidence base.
Policy SI4 Community Facilities	10.30 No reasonable alternative policy options have been identified, as it is considered that an alternative approach to that outlined in the preferred policy option would not be in conformity with the NPPF, London Plan or draft supporting evidence base.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
New social infrastructure: Infrastructure should be included as part of the development. It was recognised that these may be isolated in the early phases so the expansion of existing facilities should be explored; however, it was also noted that existing education and health infrastructure may already be under strain/ have no spare capacity.	Brent Council; Royal Borough of Kensington and Chelsea; Diocese of London; Midland Terrace Resident's; Old Oak Interim Forum; Hammersmith and Fulham Council, 1 local resident	Change proposed. OPDC's Local Plan is now supported by more detailed evidence on social infrastructure. This includes the allocation of sites to deliver required on-site infrastructure. Social infrastructure requirements are set out in Policies TCC4 and in the place policies, specifically Policy P1 (Old Oak South), P2 (Old Oak North) and North Acton and Acton Wells (P7).
Funding: Further clarity is needed on how social infrastructure will be secured, funded and managed.	Grand Union Alliance; Old Oak Park (DP9); The Hammersmith Society; Diocese of London	No change proposed. A range of implementation and funding mechanisms have been identified in the Delivery and Implementation chapter to secure social infrastructure, including on-site delivery, Community Infrastructure

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		Levy (CIL), Section 106 contributions, funding through service providers and funding through borrowing. OPDC has prepared and is updating evidence on the costs. The Education and Health Study also identifies alternative delivery routes for these facilities and alternative sources of funding based on these differing approaches. Officers are proposing that given the constant changes in the ways that social infrastructure is funded and managed, the Local Plan should not specify arrangements for each infrastructure type. OPDC will be working on social infrastructure delivery as part of its wider regeneration programme.
School provision: Existing schools do not have the capacity to meet additional demand. The Plan should provide greater clarity/certainty about the size, phasing and location of school(s), including identifying/safeguarding of land. There was concern that the impacts of school development should be carefully considered.	Brent Council, Grand Union Alliance; Hammersmith Society; Diocese of London; Old Oak Interim Forum, Midland Terrace's Residents Group; 8 local residents	Change proposed. Further work on education provision has been undertaken as part of OPDC's Education and Health Needs Study. This identifies that there are schools that can be expanded off-site to meet the needs of early phases of development. The revised Local Plan also now clearly identifies the needs for on-site provision. The supporting text to Policy TCC4 recognises that this need is based on current population projections based on tenure, mix and capacity assumptions and that this need might flex over time and needs to be carefully monitored and that there therefore needs to be a degree of flexibility in the approach taken to social infrastructure provision.
Support for education uses: Some support for both further and higher education in the OPDC area.	Grand Union Alliance, Midland Terrace Resident's Group, Old Oak Interim Forum, Ealing Council	Noted. OPDC is supportive of higher education facilities, and recognise that these, amongst other uses, may provide wider benefit in terms of being a catalyst use which promotes activity and vibrancy. High education facilities would be likely to be considered as catalyst uses. Catalyst uses are supported in Policy SP6, but would be required to be assessed against relevant Local Plan policies,

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		including the specific catalyst uses criteria in Policy TCC8.
Loss/deficiency of infrastructure: Strong concerns about the existing loss/deficiency of infrastructure around the OPDC area and, on this basis, whether there will be sufficient infrastructure capacity to support the anticipated population, particularly primary and secondary health care facilities	Grand Union Alliance; Andy Slaughter MP; The Hammersmith Society; Midland Terrace Resident's Group; Old Oak Interim Forum; HUDU; 5 local residents	Noted. OPDC's current draft Local Plan identifies the need to safeguard social infrastructure where a continuing need exists. OPDC's Education and Health Needs Study and Sport England's Sports Courts and Swimming Pools Studies have assessed surrounding facilities in order to derive the appropriate approach to infrastructure provision in the OPDC area. OPDC can only secure planning contributions from development to mitigate the development's impacts and cannot secure contributions to address existing deficiencies in provision.
Public health: Support for wider role of public health and looking at a broader range of health provision and how this could be achieved through the healthy new town concept.	LSDC, Brent Council, Midland Terrace Resident's Group, Old Oak Park (DP9), 1 local resident	Noted. OPDC is also supportive and acknowledges the importance of public health and has appointed a dedicated Health Advisor who will be working collaboratively with a range of stakeholders to help embed public health objectives into relevant policies and strategies. The revised Local Plan includes details of required on-site healthcare provision in Policy TCC4, in relevant place policies and in OPDC's infrastructure Delivery Plan (IDP).
Community facilities: Community facilities should be affordable, publicly accessible, safe and designed around a multi-use concept. They should also explore community ownership/management models and cater for a range of audiences and activities, but particularly for children and young people.	Local resident, local resident, Hammersmith and Fulham Historic Buildings Group; Grand Union Alliance; Local resident, 13 local residents	Noted. Policy D3 requires all buildings to be accessible and inclusive. Policy TCC4 secures the delivery of social infrastructure facilities in OPDC's Infrastructure Delivery Plan (IDP). This includes 2 community hub facilities providing multi-use space. Policy TCC4 also requires appropriate long-term funding sources for community facilities and Policy DI3 supports the community ownership and management of assets.

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Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Need to address current problems with access to health before development can proceed.	Michael Hangyal	Change proposed. The duty to provide health facilities for existing residents falls on the local councils (in their role as public health providers), NHS and CCGs. OPDC's responsibilities through the Local Plan are to support any proposals to increase health provision to support the achievement of this. Further wording has been inserted into the policy to support the provision of such facilities, subject to them meeting local needs and subject to them according with other relevant policies.
Welcome the positively planned approach to social infrastructure	Mayor of London	Noted.
Need to provide space for nurseries and general support for D1 space.	Susannah Abeysekera	Change proposed. Further wording has been inserted into the policy to support the provision of new or enhanced social infrastructure facilities (including nurseries), subject to them meeting local needs and subject to them according with other relevant policies. Nursery space is recognised as a form of social infrastructure in Figure 10.5. OPDC's Infrastructure Delivery Plan sets out the requirements for nursery provision.
Policy only makes passing mention on co-location with housing and other social infrastructure, as per the GLA Social Infrastructure SPG	Ealing Council	No change proposed. The policy requires co-location where appropriate and feasible. Further supporting text sets out the rationale for this.
Suggest; 'in locations that are highly accessible to the populations that they serve…' The strategy for the provision of health services in particular may well mean that they are designed to serve people who travel further than the 'existing and new communities in the area'.	Ealing Council	Change proposed. Amendments have been made to the policy to incorporate this text.

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
The scale of social infrastructure burden on the Old Oak Park site is significant and disproportionate, but it is recognised that para 10.27 notes the potential for retrospective pooling contribution.	Old Oak Park Ltd	Change proposed. Further detail on the approach to retrospective pooling mechanisms has been included in SP10 and is already included in the relevant supporting text of the place policies.
Consider that a 2/3FE primary will be sufficient to meet needs and a 4FE primary will be too large and challenging to accommodate on the site. Not all schemes are unlikely to deliver 50% affordable housing and 25% family housing, meaning projections are worst case	Old Oak Park Ltd	No change proposed. OPDC's modelling shows the need for a 4FE primary school based on the policy requirements of the Local Plan, but the supporting text to Policy TCC4 recognises 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 would need to be agreed by OPDC and the relevant service provider.
Requirement for revenue funding is unnecessarily onerous and should be removed from the Local Plan	Old Oak Park Ltd	No change proposed. The requirement for revenue funding would only be in circumstances where an element of subsidy is necessary and appropriate. In the past, examples of this have been securing peppercorn rents for certain community facilities.
Requirement for large-scale social infrastructure should not be considered as a catalyst use unless the proposal is for social infrastructure not required by the Local Plan	Old Oak Park Ltd	Change proposed. This has been clarified in the supporting text.

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
Support and agree with the proposed approach to healthcare provision and expansion of existing facilities in early phases and delivery of one on-site health facility to meet the needs of development	HUDU	Noted.
Support the recognition for flexibility in the delivery of social infrastructure as outlined in para 10.35	HUDU, Hammersmith Society, Education and Skills Funding Agency, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Support approach to securing contributions, where necessary, towards management and maintenance costs	HUDU	Noted.
Need to consider a number of site options for the provision of the health centre, including within Old Oak South	HUDU	No change proposed. The provision of the health centre has been modelled against OPDC's development trajectory and the available sites have been assessed against criteria to derive the best site for the delivery of the health centre. However, the supporting text to the policy recognises that 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 schools 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.

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
Emphasis of TCC4a) is broadly supported but it should recognise the need to support the transformation of NHS services where flexibility is required to make best use of its current estate and dispose of surplus sites for housing.	HUDU	No change proposed. The policy requires that any proposal for the loss of social infrastructure ether requires its reprovision, or that the premises has been competitively marketed without success for other forms of infrastructure and that the loss of the facility would need result in a shortfall of provision for the population that it serves.
Support policy TCC4	Royal Borough of Kensington and Chelsea, Old Oak Interim Forum, Education and Skills Funding Agency, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Text should acknowledge that it is essential that the needs of the OPDC area are met in full by new facilities within the area to ensure that there is no drain on the existing social infrastructure outside the OPDC area	Royal Borough of Kensington and Chelsea	No change proposed. OPDC is not proposing that needs are met fully by new facilities and that opportunities should be taken to expand existing facilities if feasible. The most up to date requirements associated with this are included within OPDC's Infrastructure Delivery Plan.
Broadly support TCC4a) but should be clearer as to what factors are considered to demonstrate that there is no longer a need and should require replacement facilities to be of the same or higher quality	Hammersmith and Fulham Council	Change proposed. Amendments have been made to require facilities reprovided to be of the same or higher quality. Additionally, the policy has been amended to set out the factors that are considered to demonstrate there is no longer a need.
Need to set out what factors would be considered to be unacceptable on the residential amenity of transport network	Hammersmith and Fulham Council	Change proposed. This policy strand has been removed as OPDC considers that this could give too much flexibility to allow for the loss of social infrastructure.
Do not support proposed location of the secondary school as it appears to be far from houses	Friary Park Preservation Group	No change proposed. The location of the school is close to the areas of planned housing development. The site was assessed against a number of criteria to derive the best location and this included proximity to housing, particularly family housing.

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
OPDC should specifically understand the need for places of worship rather than lumping them in with community facilities.	Diocese of London, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The supporting text has been revised to reference that the community hub should include faith space. The floorspace requirements for community space identified in OPDC's Social Infrastructure Needs Study and Infrastructure Delivery Plan acknowledges that a variety of community spaces will need to be provided, including faith space.
Insufficient attention has been given to social infrastructure. In the previous draft of the Local Plan it had its own chapter whereas now it only has one policy.	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Representations were received on the 1st draft Local Plan stating that there was a lot of repetition between social infrastructure policies. OPDC agreed and to avoid repetition, the requirements have been merged into one policy. OPDC considers the policy to be sound and to appropriately address the needs of all types of social infrastructure.
Existing social infrastructure provision is inadequate and needs to be considered together with planning for new residents. The local police station is closing, people are finding it difficult to register with their GP and other health services are being closed.	Hammersmith Society, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The provision of social infrastructure provision to meet existing needs is a matter for the service provider. However, OPDC has inserted policy wording that supports the provision of new or enhanced social infrastructure where it can be demonstrating it meets local needs and where it accords with other relevant planning policies. The supporting text clarifies that this includes support for facilities that better meet the needs of the area's existing population.
Need to safeguard land now for schools as they are demanding of space	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The locations for schools have been identified in the Infrastructure Delivery Plan.

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
In view of the increase in population, hospital services (Middlesex and Hammersmith), Health Centres, and GP services should be retained and expanded, and any closures of existing facilities prevented	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. How the NHS plans for health provision is ultimately a matter for the NHS, but as planning authority, OPDC would need to be satisfied that any loss of health facility would not result in a shortfall in provision for the population that it serves and that competitive marketing has been undertaken for a period of at least 12 months for alternative forms of social infrastructure without and appropriate offer being received.
Need to set out more clearly how community facilities will be paid for and how they will be managed	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The plan needs to maintain a degree of flexibility about management arrangements. In relation to costs, the policy sets out that contributions will be sought from development, but in accordance with Policy DI1, alternative sources of funding may also be pursued.
Support the co-location of social infrastructure	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Concerned that given the infrastructure burden, provision of social infrastructure will be constrained	Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC is working proactively with service providers to identify ways of securing funding for social infrastructure delivery. These mechanisms have been alluded to in the supporting text to Policy DI1. It includes measures such as direct funding from the service providers, which for instance is the case in relation to the EFA and delivering free schools.
More social infrastructure facilities have been added but the DIFS viability work has not been updated	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Local Plan is supported by a Whole Plan Viability Study which assesses the deliverability of its policy requirements. OPDC's IDP identifies the costs of infrastructure, where known.

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
Social infrastructure as planned for by OPDC is not comprehensive, e.g. it does not include faith facilities or facilities specifically for children and young people, and lacks precision within policy and certainty over long-term resourcing	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. Text has been added to the supporting text to clarify that community space to meet the needs of development should provide a variety of functions including public toilets, halls for hire, youth space and faith space.
Where there is no longer an identified use of the facility (a) i), the suitability of premises for other forms of social use (including community ownership) should always be considered. This should be included in the policy.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The policy has been amended to require marketing of the premises for alternative forms of social infrastructure in any scenario where the applicant is proposing to redevelop and not reprovide the facility.
OPDC are proposing limited allocation of CIL monies in the Preliminary Draft Charging Schedule	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC's IDP identifies the need for new or enhanced social infrastructure to meet needs. If facilities are not identified on the Regulation 123 List this is to provide for the possibility for enhancements or new facilities to be secured through planning obligations and/or other funding sources.
Policy should provide an expectation of support for retention of existing social infrastructure, similar to the protection given to artist space in TCC5c)	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The policy wording for TCC5c refers to 'supporting the retention' but then Policy TCC5c) cross-references to Policies E1-E3 in the employment chapter. These policies seek to ensure that new developments deliver appropriate units/floorspace to enable current occupiers to relocate. Policy E2 requires robust engagement with current occupiers will be required; however, ultimately OPDC can only secure the floorspace and in accordance with Policies E1, E2 and E3, seek to ensure it is appropriate to potential existing occupiers. If there was not an interest in an artist filling the space, there is the ability for other occupiers within the B-use class to occupy the space. The social infrastructure policy does seek to protect social infrastructure facilities, but they differ slightly in that they are providing a service to meet needs. If there is no longer a

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
		demonstrable need for that service and it has been competitively marketed for alternative social infrastructure uses without success, there needs to be a policy mechanism to allow for its alternative use.
Should set out an expectation that planning gain will be available to support protection of existing and deliver new social infrastructure to ensure continuity of provision and support for existing and new residents	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Planning contributions need to satisfy the S106 tests, being necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development. It can therefore be used to provide new infrastructure or expand existing infrastructure to meet the needs of development. The need for this is covered in TCC4. In terms of better meeting the needs of existing residents, planning contributions cannot be reasonably used for this and the responsibility to meet current needs rests with the service provider; however, the policy has been revised to give stronger support for enhancements to existing or new social infrastructure facilities that meet the needs of the existing population.
Should set out a commitment to the timely construction of a local list of community and heritage assets in consultation with residents groups	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC has undertaken consultation on a Local List of heritage assets. It is not clear what is meant by a list of community assets. Community groups can apply for premises to be listed as Assets of Community Value. Any application must be made to the host local authorities rather than to OPDC.

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
Fig 10.8 cited in para 10.37 could not be found.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. This is an erroneous reference and should have referenced Figure 4.19
Concern with the in-built flexibility in the approach to on-site health provision, NHS reduction in hospital beds, A+E closures and CCG proposals for one large health hub	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC must support the requirements of the CCGs. However, the policy recognises the need for flexibility and that alternative arrangements for the provision of social infrastructure that differs from the provision outlined in the Local Plan and IDP can be agreed with OPDC and the relevant service provider. In terms of existing provision, the policy has been revised to provide stronger support for social infrastructure facilities that help to better meet the needs of the existing population.
Additional health facilities should be built prior to or as new developments are approved	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Facilities cannot be built in advance of approvals as there will not be sufficient planning contributions to pay for the expansions. Triggers for payments are agreed on a scheme by scheme basis within Section 106 agreements. CIL payments are made on commencement of each phase.
Existing schools are under pressure and there is little room for expansion. Some people are having to travel long distances to school	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. The Education and Health Needs Study has factored current school provision and capacity into the modelling. OPDC is not the local educational authority and responsibility for meeting the needs of existing residents remains with the local authorities, but Policy TCC4 supports the provision of new and/or enhanced social infrastructure facilities that better meet the needs of the area.

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
The secondary school allocated for North Acton may prove inadequate given that catchments are dynamic and change over time	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC needs to ensure that the needs of development are appropriately met within the OPDC area. However, in accordance with the Duty to Cooperate, OPDC has been and will continue to work with the surrounding local authorities to understand if there is a need for the OPDC area to also provide educational facilities that help to meet growth wider than solely within the OPDC area. However, at this stage no need has been identified.
Should identify sites for the delivery of schools that meet the needs of development in appropriate timescales	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Local Plan does identify sites for the delivery of schools to meet the needs of development. Details on timescales are included in OPDC's IDP.
Further and higher education, linked to training and apprenticeships, should be provided for in TCC4.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Further and higher education are identified as social infrastructure in Figure 10.5 and in the glossary and are therefore covered in the policy. Further education requirements are dealt with in the IDP, which identifies that the secondary school should provide further education facilities. higher educational needs are not dealt with explicitly as provision tends to operate on a more strategic basis, but the policy supports the provision of new or enhanced social infrastructure, which could include higher education facilities, subject to it meet needs in the local area and subject to it according with other relevant planning policy.
Should clarify how ACV listings will be applied to social infrastructure	Pentecostal City Mission	No change proposed. ACVs are dealt with through legislation, which specifies that a building being a ACV is a material planning consideration when considering applications. OPDC does not consider that there is a need to re-state this legislation in a policy in the Local Plan.

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
A site for the all-through school should be identified in the Plan so that the opportunity to deliver it in future is not lost.	Harlesden Neighbourhood Forum	No change proposed. It is too difficult to predict sites likely to come forward in the longer term. The supporting text identifies that a facility is required and that its delivery would be secured through future iterations of the Local Plan.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Development Infrastructure Funding Study	• The scale of population growth at Old Oak effectively means that we are dealing with a new town. There will be 24,000 new homes, and so social infrastructure requirements are substantial. We see a need for around £191m (gross) of new social infrastructure needed for a thriving new community, including new schools, open space, play space, and community centres. • Service providers remain under great pressure to deliver services for less money. This is likely to continue to force significant innovations in service delivery and estates strategies. 30.78 A steering group will be able to keep the OPDC informed of these changes and ensure that the future infrastructure is tailored to future delivery strategies.
Social Infrastructure Needs Study	• 1 primary school • 1 secondary school • 1 health hub • Expansions to Central Middlesex Hospital and Hammersmith Hospital • 4 supernurseries • 2 community hubs • 2 sports centres
Infrastructure Delivery Plan	Education: • The projects in the Infrastructure Schedule for education cover early years, primary and secondary (including sixth form) provision. The OPDC's Health and Education Needs Study calculated the level of required provision that has been translated into the projects identified in the Schedule which includes the potential for the expansion of existing schools outside the OPDC area. These projects are supported by Policy TCC4 of the regulation 19 OPDC Local Plan 2017 and the following studies; Development Infrastructure Funding Study (DIFS); Health and Education Needs Study and the Precedents Study Health • The items identified in the Infrastructure Schedule for health focus on primary health provision. Other types of health provision may be required as development proposals come forward and the OPDC gains a better understanding of the future population.

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	Currently the proposals focus on the expansion of two existing primary care facilities and the delivery of a new facility within the OPDC area. These projects are supported by Policy TCC4 of the regulation 19 OPDC Local Plan 2017 and the following studies; Development Infrastructure Funding Study (DIFS); Social Infrastructure Needs Study and the Precedents Study. Community, Leisure and Sport • The provision of the Community Hubs that are intended to provide a range of community services are listed in the Infrastructure Schedule. These may change in location as the development proposals come forward and OPDC gains a better understanding of delivery timescales and geographical requirement for these facilities within the OPDC area. These projects are supported by Policies TCC4 and TCC6 of the regulation 19 OPDC Local Plan 2017 and the following studies; Development Infrastructure Funding Study (DIFS); Precedents Study and the Sports Courts and Swimming Pools Study Emergency Services • The provision of emergency services in the area will be dependent on the requirements of the Ambulance, Fire and Police Services. The projects listed in the Infrastructure Schedule are OPDC's current understanding of their needs. However the provision of space for these services may alter over time as their delivery models change. The OPDC will remain flexible in the delivery of infrastructure for the emergency services to ensure that they are able to meet the requirements of the growing population in a manner that best suits the services involved. These projects are supported by Policy TCC4 of the regulation 19 OPDC Local Plan 2017 and the Development Infrastructure Funding Study (DIFS).

Rationale for any non-implemented recommendations

Supporting Study	**Recommendations**	Rationale for not including
N/A	N/A	N/A

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TCC5: Culture

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
17	Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should: • take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.
23	Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should: • allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites;
70	To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: • plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments; • guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
156	Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver: • the provision of health, security, community and cultural infrastructure and other local facilities; and

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Health and Wellbeing	
Title: What are the links between health and	The range of issues that could be considered through the plan-making and decision-making processes, in respect of health and healthcare infrastructure, include how:

planning? **Paragraph:** 002 **Reference ID:** 53-002-20140306 **Revision Date:** 06 03 2014	the local plan promotes health, social and cultural wellbeing and supports the reduction of health inequalities;

London Plan (2016) Policies

Policy / paragraph reference	**Policy and paragraph text**
Chapter 3 London's People	
Policy 3.1 Ensuring equal life chances for all	D Boroughs may wish to identify significant clusters of specific groups (such as those who experience particular disadvantage and social exclusion) and consider whether appropriate provision should be made to meet their particular needs such as cultural facilities, meeting places or places of worship.
Chapter 4 London's Economy	
Policy 4.6 Support for and enhancement of arts, culture and entertainment	B Developments should: a) fulfil the sequential approach and where necessary, complete an impact assessment (see Policy 4.7) b) be located on sites where there is good existing or planned access by public transport d) address deficiencies in facilities and provide a cultural focus to foster more sustainable local communities. C In preparing LDFs, boroughs should: a enhance and protect creative work and performance spaces and related facilities in particular in areas of defined need b support the temporary use of vacant buildings for performance and creative work c designate and develop cultural quarters to accommodate new arts, cultural and leisure activities, enabling them to contribute more effectively to regeneration d promote and develop existing and new cultural and visitor attractions especially in outer London and where they can contribute to regeneration and town centre renewal e develop innovative approaches to managing pressures on high volume visitor areas and their environments f identify, manage and co-ordinate strategic and more local clusters of evening and night time entertainment activities to – address need, – provide public transport, policing and environmental services; and – minimise impact on other land uses taking account of the cumulative effects of night time uses and saturation levels beyond which they have unacceptable impacts on the environmental standards befitting a world city and quality of life for local residents g provide arts and cultural facilities in major mixed use developments

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	h seek to enhance the economic contribution and community role of arts, cultural, professional sporting and entertainment facilities.
Policy 4.7 Retail and Town Centre Development	B In taking planning decisions on proposed retail and town centre development, the following principles should be applied: a the scale of retail, commercial, culture and leisure development should be related to the size, role and function of a town centre and its catchment b retail, commercial, culture and leisure development should be focused on sites within town centres, or if no in-centre sites are available, on sites on the edges of centres that are, or can be, well integrated with the existing centre and public transport

Draft London Plan (2017) Policies

Policy / paragraph reference	**Policy and paragraph text**
Chapter 1 Planning for London's Future	
Policy GG1 Building strong and inclusive communities	To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must: D: Promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction during the daytime, evening and night time.
Policy GG5 Growing a good economy	To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must: F Promote and support London's rich heritage and cultural assets, and its role as a 24-hour city.
Chapter 2 Spatial Development Patterns	
Policy SD6 Town Centres	A London's varied town centres and their vitality and viability should be promoted and enhanced as: 1) strong, resilient, accessible, inclusive and viable hubs for a diverse range of uses including employment, business space, shopping, culture, leisure, night-time economy, tourism, civic, community, social infrastructure and residential development F The management of vibrant daytime, evening and night-time activities should be promoted to enhance town centre vitality and viability, having regard to the role of individual centres in the night-time economy (see Figure 7.7 and Table A1.1) and supporting the development of cultural uses and activity.
Policy SD8 Town centres: development principles and Development Plan Documents	A Development Plans and development proposals should take a town centres first approach by: 1) adopting a sequential approach to accommodating town centre uses including retail, commercial, offices, leisure, entertainment, culture, tourism and hotels such that new development of these uses is focused on sites within town centres or (if no sites are available, suitable or viable) on sites on the edges of centres that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport
Chapter 6 Economy	

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Policy E3 Affordable workspace	A In defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose. Such circumstances include workspace that is: 1) dedicated for specific sectors that have social value such as charities or social enterprises 2) dedicated for specific sectors that have cultural value such as artists' studios and designer-maker spaces 3) dedicated for disadvantaged groups starting up in any sector 4) providing educational outcomes through connections to schools, colleges or higher education 5) supporting start-up businesses or regeneration. B Particular consideration should be given to the need for affordable workspace for the purposes in part A above: 1) where there is existing affordable workspace on-site 2) in areas where cost pressures could lead to the loss of affordable workspace for micro, small and medium-sized enterprises (such as in the City Fringe around the CAZ and in Creative Enterprise Zones) 3) in locations where the provision of affordable workspace would be necessary or desirable to sustain a mix of business or cultural uses which contribute to the character of an area.
Chapter 7 Heritage and Culture	
Policy HC5 Supporting London's culture and creative industries	A The continued growth and evolution of London's diverse cultural facilities and creative industries is supported. In Local Plans and through planning decisions, boroughs should: 1) protect existing cultural venues, facilities and uses where appropriate and support the development of new cultural venues in town centres and places with good public transport connectivity 2) identify and promote new, or enhance existing, locally-distinct clusters of cultural facilities, venues and related uses defined as Cultural Quarters, especially where they can provide an anchor for local regeneration and town centre renewal 3) identify, protect and enhance strategic clusters of cultural attractions 4) consider the use of vacant properties and land for pop-ups or meanwhile uses for cultural and creative activities during the day and at night-time to stimulate vibrancy and viability and promote diversity in town centres, Cultural Quarters and other areas 5) seek to ensure that Opportunity Areas and large-scale mixed-use developments include new cultural venues and/or facilities and spaces for outdoor cultural events. B Boroughs are encouraged to work with the Mayor and relevant stakeholders to identify Creative Enterprise Zones in Local Plans: 1) in areas that have emerging or existing clusters of creative industries; or 2) in areas of identified demand and more deprived areas where there is evidence that the designation of a Creative Enterprise Zone will enhance the local economy and provide facilities and workspace for the creative industries. C Where a Creative Enterprise Zone has been identified, Local Plan policies should: 1) develop, enhance, protect and manage new and existing creative workspace, providing flexibility for changing business needs, and an

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	attractive business environment including related ancillary facilities 2) support existing, and the development of new, cultural venues within the Creative Enterprise Zone 3) help deliver spaces that are suitable, attractive and affordable for the creative industries, taking into account the particular requirements of established and emerging creative businesses in the Creative Enterprise Zone in accordance with Policy E2 Low-cost business space, Policy E4 Land for industry, logistics and services to support London's economic function and Policy E8 Sector growth opportunities and clusters 4) encourage the temporary use of vacant buildings and sites for creative workspace and activities 5) integrate public transport, digital and other infrastructure and service provision such as leisure, recreation and community facilities in the establishment and development of the Creative Enterprise Zone 6) support a mix of uses which derive mutual benefits from, and do not compromise, the creative industries and cultural facilities in the Creative Enterprise Zone in line with the Agent of Change principle (see Policy D12 Agent of Change) 7) contribute to the achievement of wider objectives for the business location such as the economic vitality and diversity of a town centre or the intensification of an industrial area.
Chapter 9 Sustainable Infrastructure	
Policy SI16 Waterways – use and enjoyment	C Development proposals for cultural, educational and community facilities and events should be supported and promoted, but should take into consideration the protection and other uses of the waterways.
Chapter 11 Funding the London Plan	
Policy DF1 Delivery of the Plan and Planning Obligations	D When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements, and following this: 2) Recognise the importance of affordable workspace and culture and leisure facilities in delivering good growth.

Mayor's Town Centres SPG

Policy / paragraph reference	**Policy and paragraph text**
SPG Implementation 1.1	Boroughs and town centre partners are encouraged to: g keep local plan policies under regular review to allow town centres and the mix of retail uses relative to cultural, leisure, business, residential, civic and community services to evolve over time to remain competitive.
SPG Implementation 1.2 – Arts,, Culture, Leisure and the Night Time Economy	Boroughs and town centre partners are encouraged to: • a) encourage the integration of culture, creativity and good design into the built environment, having regard to those areas deficient in cultural provision and drawing on best practice across the capital • b) identify and define the special characteristics of Strategic Cultural Areas and support initiatives to enhance them • c) support the development of London's creative industries in town centres

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	• d) develop and promote clusters of cultural activities and related uses as cultural quarters, particularly to support regeneration • e) encourage and support creative performances and exhibitions in public spaces • g) promote inclusive access to arts, culture, leisure and the night time economy

Mayor's Culture and Night-Time Economy SPG

Policy / paragraph reference	Policy and paragraph text
03 Sustaining existing venues and providing new facilities	3.6. Planning policies and their implementation have an important role to play in helping to correct these market impacts. 37. In line with the NPPF23, boroughs should recognise town centres as the heart of their communities and allocate a range of suitable sites to meet the needs of uses including leisure, tourism and cultural. Planning policies and decisions should guard against the unnecessary loss of valued social, recreational and cultural facilities and services. They should ensure that such facilities are able to develop and modernise and are retained for the benefit of the community24. 3.8. Policy 4.6 of the London Plan sets out the Mayor's approach to supporting London's arts, cultural, sporting and entertainment enterprises. Policy 4.7 provides principles for assessing the need and capacity for culture and leisure development in town centres. For existing venues, boroughs should enhance and protect creative work and performance spaces and related facilities in areas of defined need (4.6Ca). 3.9. Under Policy 3.1B, facilities and services that meet the needs of particular groups and communities should be protected. Loss of these facilities without adequate justification or replacement should be resisted. Boroughs should ensure that this protection includes meeting the needs of those groups and communities who make use of cultural facilities in the evening and night time. This includes, but is not limited to, younger people and the LGBT community. An exceptional example of a cultural venue associated with a particular community is described in Case Study 2: Royal Vauxhall Tavern, LB Lambeth. Protection of the premises included a grade II listing as a 'living monument' to the development of gay identity over 150 years. 3.10. London's heritage and historic environment makes a significant and valuable contribution to the city's cultural offer as many cultural facilities are also heritage assets. The heritage or townscape significance of a cultural venue, facility or area in addition to its cultural value can offer further protection through the planning system. Case Study 3: Denmark Street, LB Camden shows how an area known as Tin Pan Alley was designated a conservation area. This has enabled the London Borough of Camden to protect and promote the activities that help make up the area's cultural identity. 3.11. For new premises, site selection should follow the sequential approach, focusing on sites within town centres (4.6B and 4.7B). New arts,

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	culture, sport and entertainment facilities should address deficiencies. Developments should provide a cultural focus to foster more sustainable communities (4.6Bc). 3.12. Boroughs should develop policies for existing and new cultural facilities. This includes designating cultural quarters to accommodate new activities as well as providing arts and cultural facilities in major mixed use developments. Boroughs should also promote and develop both existing and new cultural attractions. They should identify, manage and coordinate strategic and more local clusters of evening and night-time entertainment activities (4.6C). 3.13. The extent to which night-time activities should be encouraged to develop in a specified area or be spread more widely will depend on local circumstances. However, boroughs should generally encourage a wide range of night-time activities including the expansion of existing culture and leisure venues (London Plan para 4.39). The Town Centres SPG provides further guidance on the implementation of London Plan policies for live music venues. This includes recognising live music venues as part of a broader cultural offer which contributes to night-time diversity in town centres.

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	**Policy and paragraph text**
Policy TC5 Culture Sports and leisure Facilities	Alternative policy option 1. Set a quantum threshold for culture, sports and leisure uses. 9.51 This option would identify an indicative floorspace figure for non A-class town centre uses such as for leisure, sports and culture. It would provide a clearer indication of the acceptable quantum of floorspace for other town centre uses, providing greater certainty to stakeholders. However, this approach would constrain the ability for these sorts of uses to aid with placemaking and could potential prevent a major cultural, sports or leisure use from locating the area that could act as a catalyst for regeneration and provide a strategic cultural or leisure destination.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	**Who raised the issue?**	**What are we doing to address the issue?**
Culture: Concern that approach is too strategic and focussed on meeting	Grand Union Alliance	No change proposed. OPDC considers that the policy strikes an appropriate

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London-wide needs rather than addressing deficiencies in local needs.		balance in recognising that culture can help to meet both local and London-wide needs.
Space should be allocated for cultural, leisure and sporting activities with developers making a major contribution to schools, GP surgeries, hospitals and A and E (currently being downgraded), theatres, art galleries, museums, cinemas, swimming pools, gyms, food shopping such as Aldi and Lidl	2 Residents	No change proposed. This is covered in a variety of policies in the Local Plan, including SP4, SP6, TCC2, TCC4, TCC5, TCC6 and TCC8.
Would like to see specific reference to the studio requirements of professional artists and a commitment to work with experienced providers	Association for the Cultural Advancement through visual Art	Change proposed. The Plan now acknowledges the importance of studio provision as part of future employment space (see E1, E2, E3) and its contribution to arts and culture (TCC5)
Plan should identify need for local arts centre	Local resident	Policy TCC5 supports the provision of new culture and arts facilities and requires larger proposals to submit a Cultural Action Plan, which could include a local arts centre.

Regulation 19(1) consultation

What is the issue?	**Who raised the issue?**	**What are we doing to address the issue?**
Support securing contributions towards public art	Canal and River Trust	Noted.
Para 10.41 references the Mayor's Cultural Strategy, which is now out of date	Mayor of London	Change proposed. This has been updated to reference the new Mayor's draft Culture Strategy.
Support Policy TCC5	Friary Park Preservation Group, ArtWest	Noted.
Support retention of existing and provision of new artist space, but provision needs to be affordable	ArtWest, Old Oak Interim Forum, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted. The need for affordable workspace is set out in Policy E3, which the policy cross-references.
Support para 10.46	ArtWest	Noted.

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
The recommendation from the Cultural Principles document for a Cultural Action Plan to be submitted by large developments should be included in the Local Plan	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. This requirement is included in TCC5.
Cultural facilities should be for the benefit of locals and Londoners rather than the international community	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Local Plan supports cultural facilities that meet identified needs. OPDC considers that the scale of land and the accessibility of the area means that cultural facilities could meet local and strategic needs. OPDC does not propose to set out that facilities that provide for the international community will not be supported. Any such use would however be likely to be a 'catalyst use' though and would therefore need to accord with the requirements set out in Policy TCC8.
Proposal for Science Museum on Cargiant site is unclear	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. This is a proposal from a developer and is not something required as part of the Local Plan. The Local Plan seeks to support proposals for cultural uses, but maintains flexibility over which specific cultural uses should be provided.
In addition to contribution to the public realm through S106 agreements, the	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. This requirement is dealt with in the 'and/or the provision of public art' point.
principle of providing or contributing to public art should also be considered as an		
obligation		
Where there is no longer an identified use of the facility (a) (i), the suitability of premises for other forms of social use (including community ownership) should always be considered.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. It is not clear what is meant by 'social' use; however, community uses are in a separate use class and the Local Plan cannot require a cultural use (usually Use class SG or Use Class D2) to be marketed as a community use (Use class D1), before an

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
		alternative use can be considered. Community ownership of assets is dealt with in Policy DI3.
Should include 'provide inclusive access in terms of age, ability/disability and income'	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Inclusive access is dealt with in relation to all buildings and public realm through policies SP9 and D3.
Should use Section 106 money to support the growth of artists	ACAVA	No change proposed. The Local Plan identifies in Policy E3 that OPDC will look to secure low cost and/or open workspace and studios from developments. This will help support the growth of SMEs, including artists.
The plan should include space for an arts/community centre	ArtWest	No change proposed. The IDP identifies the need for two community hubs to meet the needs of the new population. There may be the potential to provide exhibition space as part of this or co-locate with artist space, in accordance with Policy TCC4. Policy TCC5 supports applications for new cultural space, subject to certain policy criteria.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Cultural Principles	• Ensure the Local Plan highlights the importance of culture to the area. • Ensure that character, heritage and culture sit at the heart of placemaking. • Develop a Cultural Strategy to further consider opportunities for culture in the OPDC area. • Ensure that consultation is meaningful, that it reaches as many people and communities as possible, and that it includes young people and families. • Encourage ‘anchor’ tenants and cultural institutions to locate in

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	the area, and explore options for attracting and retaining creative businesses and affordable workspace
Retail and Leisure Needs Study	• Cultural uses should provide a key aspect of town centres in the OPDC area, in particular at Old Oak High Street and fronting the Grand Union Canal.

Rationale for any non-implemented recommendations

Supporting Study	**Recommendations**	Rationale for not including
N/A	N/A	N/A

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TCC6: Sports and Leisure

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
24	Local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.
26	When assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500 sq m).This should include assessment of: • the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and • the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.
70	To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: • plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments; • guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
73	Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.
74	Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: • an assessment has been undertaken which has clearly shown the open

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	space, buildings or land to be surplus to requirements; or • the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or • the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.
167	Assessments should be proportionate, and should not repeat policy assessment that has already been undertaken. Wherever possible the local planning authority should consider how the preparation of any assessment will contribute to the plan's evidence base.
171	Local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation and places of worship), including expected future changes, and any information about relevant barriers to improving health and well-being.

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Health and Wellbeing	
Title: What are the links between health and planning? **Paragraph:** 002 **Reference ID:** 53-002-20140306 **Revision Date:** 06 03 2014	The link between planning and health has been long established. The built and natural environments are major determinants of health and wellbeing. The importance of this role is highlighted in the promoting health communities section. This is further supported by the 3 dimensions to sustainable development (see National Planning Policy Framework paragraph 7. The National Planning Policy Framework encourages local planning authorities to engage with relevant organisations when carrying out their planning function. In the case of health and wellbeing, the key contacts are set out in this guidance. Engagement with these organisations will help ensure that local strategies to improve health and wellbeing) and the provision of the required health infrastructure (see National Planning Policy Framework paragraphs 7, 156 and 162) are supported and taken into account in local and neighbourhood plan making and when determining planning applications. The range of issues that could be considered through the plan-making and decision-making processes, in respect of health and healthcare infrastructure, include how: • development proposals can support strong, vibrant and healthy communities and help create healthy living environments which should, where possible, include making physical activity easy to do and create places and spaces to meet to support community engagement and social capital; • the local plan promotes health, social and cultural wellbeing and supports the reduction of health inequalities; • the local plan considers the local health and wellbeing strategy and other relevant health improvement strategies in the area; • the healthcare infrastructure implications of any relevant

	proposed local development have been considered; • opportunities for healthy lifestyles have been considered (eg planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical activity, and promotes access to healthier food, high quality open spaces, green infrastructure and opportunities for play, sport and recreation); • potential pollution and other environmental hazards, which might lead to an adverse impact on human health, are accounted for in the consideration of new development proposals; and • access to the whole community by all sections of the community, whether able-bodied or disabled, has been promoted.
Open Space, Sports and Recreation Facilities	
Title: How do local planning authorities and developers assess the needs for sports and recreation facilities? **Paragraph:** 002 **Reference ID:** 37-002-20140306 **Revision Date:** 06 03 2014	Authorities and developers may refer to Sport England's guidance on how to assess the need for sports and recreation facilities.
Title: Who should local planning authorities consult in cases where development would affect existing open space, sports and recreation facilities? **Paragraph:** 003 **Reference ID:** 37-002-20140306 **Revision Date:** 06 03 2014	Local planning authorities are required to consult Sport England in certain cases where development affects the use of land as playing fields. Where there is no requirement to consult, local planning authorities are advised to consult Sport England in cases where development might lead to: • loss of, or loss of use for sport, of any major sports facility; • proposals which lead to the loss of use for sport of a major body of water; • creation of a major sports facility; • creation of a site for one or more playing pitches; • development which creates opportunities for sport (such as the creation of a body of water bigger than two hectares following sand and gravel extraction); • artificial lighting of a major outdoor sports facility; • a residential development of 300 dwellings or more. Authorities should also consider whether there are planning policy reasons to engage other consultees.
Natural Environment	
Title: How can green infrastructure help to deliver wider planning	Green infrastructure can help to deliver a variety of planning policies including: Promoting healthy communities

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policy? **Paragraph:** 030 **Reference ID:** 8-030-20160211 **Revision Date:** 11 02 2016	• Green infrastructure can improve public health and community wellbeing by improving environmental quality, providing opportunities for recreation and exercise and delivering mental and physical health benefits. Green infrastructure also helps reduce air pollution, noise and the impacts of extreme heat and extreme rainfall events.

London Plan (2016) Policies

Policy / paragraph reference	**Policy and paragraph text**
Chapter 3 London's People	
Policy 3.6 Children and Young Peoples Play and Informal Recreation	C Boroughs should: a undertake audits of existing play and informal recreation provision and assessments of need in their areas, considering the qualitative, quantitative and accessibility elements of play and informal recreation facilities b produce strategies on play and informal recreation supported by LDF policies to improve access, safety and opportunity for all children and young people in their area.
Policy 3.19 Sports Facilities	B) Development proposals that increase or enhance the provision of sports and recreation facilities will be supported. Proposals that result in a net loss of sports and recreation facilities, including playing fields should be resisted. C) Where sports facility developments are proposed on existing open space, they will need to be considered carefully in light of policies on Green Belt and protecting open space (Chapter 7) as well as the borough's own assessment of needs and opportunities for both sports facilities and for green multifunctional open space. D) Within LDFs Boroughs should assess the need for sports and recreation facilities in line with the NPPF (paras.73-74) at the local and subregional levels regularly, and secure sites for a range of sports facilities.
Chapter 4 London's Economy	
Policy 4.6 Support for and Enhancement of Arts, Culture, Sport and Entertainment	C In preparing LDFs, boroughs should: a) enhance and protect creative work and performance spaces and related facilities in particular in areas of defined need d) promote and develop existing and new cultural and visitor attractions especially in outer London and where they can contribute to regeneration and town centre renewal g) provide arts and cultural facilities in major mixed use developments
Chapter 7 London's Living Spaces and Places	
Policy 7.27 Blue Ribbon Network: Supporting Infrastructure and	B Within LDFs boroughs should identify the location of waterway facilities and any opportunities for enhancing or extending facilities, especially within opportunity areas and other areas where a particular need has been identified.

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Recreational Use	

Draft London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
Chapter 5 Social Infrastructure	
Policy S3 Education and childcare facilities	B Development proposals for education and childcare facilities should: 6) encourage the shared use of services between schools, colleges, universities, sports providers, and community facilities
Policy S5 Sports and recreation facilities	A In order to ensure there is sufficient supply of good quality sports and recreation facilities, boroughs should: 1) regularly assess the need for sports and recreation facilities at the local and sub-regional level 2) secure sites for a range of sports and recreation facilities 3) maintain and promote the Walk London Network shown on Figure 5.1 and encourage networks for walking, cycling and other activities. B Development proposals for sports and recreation facilities should: 1) increase or enhance the provision of facilities in accessible locations, well-connected to public transport and link to networks for walking and cycling 2) maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges and other community facilities 3) support the provision of sports lighting within reasonable hours where there is an identified need for sports facilities and lighting is required to increase their potential usage, unless the lighting gives rise to demonstrable harm to the local community or biodiversity 4) ensure that there is no net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand. C Where facilities are proposed on existing open space, boroughs should consider these in light of policies on protecting open space (Policy G3 Metropolitan Open Land) and the borough's own assessment of needs and opportunities for sports facilities, and the potential impact that the development will have.
Chapter 8 Green Infrastructure and Natural Environment	
Policy G1 Green infrastructure	B Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.

Mayor of London's Social Infrastructure SPG

Policy / paragraph reference	Policy and paragraph text

Implementation Point 1.5	In implementing London Plan policies and especially London Plan Policy 3.19, the Mayor will, and boroughs and other partners are advised to: - Plan across borough boundaries and particularly on a sub-regional basis to ensure access to a full range of sports facilities - Plan across services to ensure that identified demographic needs are addressed within local plans and that the provision of sports facilities complements as far as possible the broader objectives of the plan - Promote multi-sport hubs to provide facilities for a range of sports in one location. - Prepare a playing pitch strategy on a sub-regional basis, across borough boundaries within or similar to those groupings used in the London Plan.

Mayor of London's Town Centre SPG

Policy / paragraph reference	Policy and paragraph text
SPG Implementation 1.2	Boroughs and town centre partners are encouraged to: g) promote inclusive access to arts, culture, leisure and the night time economy

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Policy and paragraph text
Policy TC5 Culture, Sports, and Leisure Facilities	1. Set a quantum threshold for culture, sports and leisure uses. 9.51 This option would identify an indicative floorspace figure for non A-class town centre uses such as for leisure, sports and culture. It would provide a clearer indication of the acceptable quantum of floorspace for other town centre uses, providing greater certainty to stakeholders. However, this approach would constrain the ability for these sorts of uses to aid with placemaking and could potential prevent a major cultural, sports or leisure use from locating the area that could act as a catalyst for regeneration and provide a strategic cultural or leisure destination.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Space should be allocated for cultural, leisure and sporting activities with	Residents	No change proposed. This is covered in a variety of policies in the Local Plan,

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developers making a major contribution to schools, GP surgeries, hospitals and A and E (currently being downgraded), theatres, art galleries, museums, cinemas, swimming pools, gyms, food shopping such as Aldi and Lidl		including SP4, SP6, TCC2, TCC4, TCC5, TCC6 and TCC8.
There appears to be no requirement to provide playing pitches for team sports in the Local Plan	Diocese of London	Change proposed. Outdoor sports pitches are covered in the requirements for multi-functional open space and play space outlined in Policies SP7, D7 and EU1. Indoor sports facility requirements are outlined in Policy TCC6.
All sports and fitness venues should be encouraged to achieve the English Federation of Disability Sports Inclusive Fitness Initiative Mark	Greater London Authority	Change proposed. This wording has been included in Policy TCC6.
The mix of leisure and cultural facilities needs to meet the needs of the existing, surrounding and future populations, in being affordable (and including free activities), meeting the leisure needs of all ages and sectors of the population	Grand Union Alliance, 1 resident	Noted. The policy (TCC6) references the requirement to meet needs. The policy also references that affordable access will be secured.
As further justification text we propose the following: Add to 9.7: The OPDC will support retail and leisure developments which provide a balanced offer across the network of centres in the OPDC area and region, and seek to ensure a significant proportion of the leisure and retail provision is affordable and/or free, meeting the needs of all ages and sectors of the population.	Grand Union Alliance	No change proposed. The Local Plan deals with affordable sports provision in policy TCC6. Policy TCC2 seeks to secure smaller units which would be more affordable to retailers. It would be unviable to require that sports facilities and retail provision should be free.
No change proposed. Requirements for buildings to be accessible and inclusive to all are set out in Policy D3. Policy TCC6 (Sports and Leisure) now goes further than this and requires that	Grand Union Alliance	Alter policy section (d) to 'provide accessible and inclusive access for local communities in terms of age, ability/disability and income'

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facilities also achieve the "Inclusive Fitness Initiative Mark" accreditation		
Community facilities could provide for a range of activities. Suggestions include sports (snow boarding, pitches, sports/gymnastic/dance studios), leisure/recreation (video gaming, bars, restaurants, coffee shops, theatres, cinema) and nurseries	Workshop	Noted. Policies TCC4, TCC5 and TCC6 deal with these sorts of facilities and support their provision subject to certain criteria being met

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
The Plan is unsound as it does not have adequate reference to the need for playing pitches. The policy should be revised to make reference to the need for playing pitches to meet needs	Sport England	Change proposed. Reference has been inserted in Policy TCC6 for the need for development to protect existing and contribute towards new outdoor sports space, including playing pitches.
Do not agree with the proposed methodology and approach to sports centre provision	Sport England	No change proposed. OPDC considers the approach to be robust, based on evidence and effective for securing contributions from developers and proposes to maintain the approach set out in the policy.
Should reflect the wording of the NPPF para 74, which does not allow for the loss of sports facilities purely because it may be economically inviable.	Sport England	Change proposed. The wording on protection of sports and leisure facilities has been strengthened to align with the NPPF.
Wording should be changed so that requirement is not that the facility should be appropriately replaced, but is replaced with a facility of at least equivalent quality, quantity and accessibility as stated in the NPPF.	Sport England, Hammersmith and Fulham Council	Change proposed. The policy has been amended to reflect these requirements
Policy a)iii) is not an appropriate as it does not accord with the agent of change.	Sport England	Change proposed. This policy strand has been removed and replaced with the NPPF requirements around the provision of alternative sports provision.

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
Not relevant to repeat this here as the issue would be covered in transport policies and in policies dealing with amenity considerations	Sport England	Change proposed. OPDC agrees that these issues are covered through other policies and do not require repetition here.
Anything more than a 25 metre swimming pool is considered to be unnecessary when compared to other regeneration schemes and other infrastructure priorities for the area	Old Oak Park Ltd	No change proposed. The place policies and IDP identify that the starting point is to provide two sports centres, each with 1x25 pool, but equally, there could alternatively be one larger facility that provides a 50m pool and this could help to meet a deficiency in West London for a facility of this size. The only current development precedent for the scale envisaged in Old Oak is the Olympics in East London, and this does have a 50m pool, so the point around precedents from other regeneration projects is considered to be unjustified.
The approach akin to Fulham Pools may be a potential way to deliver sports facilities, but it is unlikely to be viable until a substantial proportion of the area has been built out	Old Oak Park Ltd	No change proposed. The Fulham Pools model is run on a commercial basis but with concessions access and is viable. There would be a need to consider the appropriate timing to deliver the facility to ensure that there is a critical mass of people wishing to use the facility.
Support Policy TCC6	Friary Park Preservation Group	Noted.
Support policy TCC6c)iii)	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted
TCC6 (a) should conform with TCC4 (a) and ensure that where there is no longer an identified use of the facility the suitability of premises for other forms of social use (including community ownership) should always be considered.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. It is not clear what is meant by 'social' use; however, community uses are in a separate use class and the Local Plan cannot require a sport use (Use Class D2) to be marketed as a community use (Use class D1), before an alternative use can be considered. Community ownership of assets is dealt with in Policy DI3.

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
Should include an expectation of support for the retention of existing facilities	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The policy has been revised to give stronger protection to existing facilities, but the policy does recognise that if there are other facilities in the local area that meet needs, its loss may be acceptable.
Planning gain should be used towards protecting existing and delivering new sports and leisure facilities	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The policy identifies that planning contributions will be sought towards providing new sports and leisure facilities.
Should require new sports and leisure facilities to 'provide inclusive access in terms of age, ability/disability and income'	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed inclusive and accessible design is secured for all buildings and public realm through policy SP9 and DI3. The policy expressly requires public access for all ages to indoor facilities to ensure that there is non-membership access to those facilities.
Concerned about loss of existing affordable sports and leisure facilities to be replaced by less affordable commercial provision. Not for profit facilities should be given stronger protection	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The policy requires that any assessment justifying the loss of an existing sports or leisure use demonstrates that there is suitable alternative provision to meet needs resulting from the lost facility in terms of capacity, access, quality, function and affordability
This policy could draw more effectively on existing evidence bases concerning the objective need for sports facilities across the neighbouring boroughs and wider region, especially for youth and teenagers for whom provision is lacking.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. OPDC's Local Plan supports the provision of new sports and leisure facilities and sets out how new development should contribute appropriately and proportionately to the provision of affordable and public access facilities.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Infrastructure	• The provision of the Community Hubs that are intended to provide

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Delivery Plan	a range of community services are listed in the Infrastructure Schedule. These may change in location as the development proposals come forward and OPDC gains a better understanding of delivery timescales and geographical requirement for these facilities within the OPDC area. These projects are supported by Policies TCC4 and TCC6 of the regulation 19 OPDC Local Plan 2017 and the following studies; Development Infrastructure Funding Study (DIFS); Precedents Study and the Sports Courts and Swimming Pools Study
Sports Courts and Swimming Pools Study	• Identifies that LBHF is currently reasonably well served by swimming pools but there is an under-provision of sports courts. • As the population grows, there will be increased pressure on swimming pools and the under-provision of sports courts will be further exacerbated. • Identifies that the Old Oak and Park Royal area is currently deficient in access to public sports halls and swimming pools. • Identifies that population projections for the Old Oak and Park Royal area are likely to give rise to a need for approximately 13 sports courts and two 12x25m swimming pools, or 1 sports court per 3,000 residents and 1sqm of swimming pool space for every 90 residents.

Rationale for any non-implemented recommendations

Supporting Study	**Recommendations**	Rationale for not including
N/A	N/A	N/A

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TCC7: Public Houses

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
70	To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: • plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments; • guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
156	Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver: • the provision of health, security, community and cultural infrastructure and other local facilities; and

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
	N/A No relevant guidance

Community Right to Bid: Non-statutory advice note for local authorities (2012)

Policy / paragraph reference	Policy and paragraph text
Section 3 List of assets of community value	Land which may, and may not, be listed as an asset of community value 3.5 If a local authority receives a valid nomination, it must determine whether the land or building nominated meets the definition of an asset of community value as set out in section 88 of the Act. A building or other land in a local authority's area is land of community value if in the opinion of the authority — (a) an actual current use of the building or other land that is not an ancillary use furthers the social wellbeing or social interests of the

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	local community, and; (b) it is realistic to think that there can continue to be non-ancillary use of the building or other land which will further (whether or not in the same way) the social wellbeing or social interests of the local community. (Section 88(1) Localism Act 2011) Section 88(2) of the Act extends this definition to land which has furthered the social wellbeing or social interests of the local community in the recent past, and which it is realistic to consider will do so again during the next five years. 3.6 There are some categories of assets that are excluded from listing. The principal one is residential property. This includes gardens, outbuildings and other associated land, including land that it is reasonable to consider as part of the land with the residence where it is separated from it only by a road, railway line, river or canal where they are in the same ownership as the associated residence. Details of this are set out in paragraphs 1 and 2 of Schedule 1 to the Regulations. "The same ownership" includes ownership by different trusts of land settled by the same settlor, as well as literally the same individual owner. 3.7 There is an exception to this general exclusion of residential property from listing. This is where an asset which could otherwise be listed contains integral residential quarters, such as accommodation as part of a pub or a caretaker's flat. 3.8 There are two further categories of assets excluded from listing: (a) Land licensed for use as a residential caravan site (and some types of residential caravan site which do not need a licence), in paragraph 3 of Schedule 1 to the Regulations. (b) Operational land of statutory undertakers as defined in section 263 of the Town and Country Planning Act 1990, in paragraph 4 of Schedule 1 to the Regulations.

London Plan (2016) Policies

Policy / paragraph reference	**Policy and paragraph text**
Chapter 4: London's Economy	
Policy 4.8 Supporting a Successful and Diverse Retail Sector and Related Facilities and Services	B LDFs should take a proactive approach to planning for retailing and related facilities and services and: • c provide a policy framework for maintaining, managing and enhancing local and neighbourhood shopping and facilities which provide local goods and services, and develop policies to prevent the loss of retail and related facilities that provide essential convenience and specialist shopping or valued local community assets, including public houses, justified by robust evidence

Draft London Plan (2017) Policies

Policy / paragraph reference	Policy and paragraph text
Chapter 7: Heritage and Culture	
Policy HC6 Supporting the night-time economy	B In Development Plans, town centre strategies and planning decisions, boroughs should: • 6) protect and support evening and night-time cultural venues such as pubs, night clubs, theatres, cinemas, music and other arts venues.
Policy HC7 Public Houses	A Boroughs should: 1) protect public houses where they have a heritage, economic, social or cultural value to local communities, and where they contribute to wider policy objectives for town centres, night-time economy areas and Creative Enterprise Zones 2) support proposals for new public houses to stimulate town centre regeneration, cultural quarters, the night-time economy and mixed-use development, where appropriate. B Applications that propose the loss of public houses with heritage, cultural, economic or social value should be refused unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub in the foreseeable future. C Development proposals for redevelopment of associated accommodation, facilities or development within the curtilage of the public house that would compromise the operation or viability of the public house use should be resisted.

Mayor of London's Culture and Night-Economy SPG

Policy / paragraph reference	Policy and paragraph text
0.2 Pubs	2.8 In May 2017, changes to the Town and Country Planning (General Permitted Development Order) (England) 2015 GPDO removed the previous permitted development rights that allowed the change of use of A4 (drinking establishments) to A1 (shops), A2 (financial and professional services) and A3 (restaurants and cafes) without the need to apply for planning permission. To allow for more versatility of pub development, a permitted change of use will be available for a mixed use of A4 use (drinking establishments) and an A3 use (restaurants and cafes). These changes are generally considered as a positive move towards protecting pubs. It means that boroughs concerned with the loss of pubs will no longer need to put in place Article 4 Directions to remove permitted development rights for pubs. 2.9 Before the changes were made to the GPDO in 2017, designating a pub as an Asset of Community Value (AVC) was a way to remove permitted development rights. The changes to the GPDO means this is no longer an incentive for designating a pub as a AVC. AVC designations for Pubs should still be supported, but the designation does not necessarily protect against development for other uses.

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	2.10 ACV designation can have a positive outcome for local communities. An example of a successful application for a pub to have community asset status which led on to it being acquired by the local community is described in Case Study 1: Antwerp Arms, LB Haringey. 2.11 Boroughs should also ensure that 'agent of change' principles are applied when considering applications for new uses near to a pub (see chapter 5). This includes changing the upper floors of a pub building to residential use. Such floors often accommodate uses ancillary to the pub including accommodation for those working in the pub. This type of ancillary residential use is integral to the pub operation. It is not the same as independent residential use whose occupants are likely to have different expectations of amenity, particularly at night. 2.12 Many pubs are popular because they have intrinsic character. This is often derived from their architecture or their longstanding historic use as a public house. To provide further protection of pubs, boroughs should consider tools such as heritage protection including locally listing buildings that house pubs, their townscape merits and conservation area status. 2.13 The value of a local or community pub cannot always be quantified. In developing strategies and policies to enhance and retain public houses, boroughs can draw on both London Plan policies and the NPPF.

Mayor of London's Town Centres SPG

Policy / paragraph reference	**Policy and paragraph text**
SPG Implementation 1.2: Arts, Culture, Leisure and the Night Time Economy	Boroughs and town centre partners are encouraged to: j) take forward London Plan and NPPF policy to retain, manage and enhance public houses where there is sufficient evidence of need, community asset value and viability in pub use and undertake realistic appraisals of the viability and roles of pubs to put their offer to communities on a sounder basis

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	**Policy and paragraph text**
Policy SI5: Pubs	Alternative policy option 1. OPDC takes a more flexible approach to the loss of public houses and does not set out stringent requirements for information on accounts and marketing of the property. 10.37 This approach would have potential advantages of it allowing for the optimisation of development on sites occupied by public houses. This approach may however result in the loss of pubs that provide a valued community facility and has therefore not been identified as the preferred policy option

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Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Pubs: Strong support for the protection of pubs, but there are opportunities to strengthen the policy.	Brent Council, GUA, Historic England, Midland Terrace Resident's Group, The Hammersmith Society, Hammersmith and Fulham Historic Buildings Group	Change proposed. Officers have considered the responses to the consultation and have appropriately updated the policy to ensure that it is robust and gives adequate protect to public houses.
An additional policy criteria is needed to ensure any proposed alternative uses for pubs would not detrimentally affect character of the area and building. The policy could also refer to their distinctive townscape qualities.	London Borough of Brent	Change proposed. This reference has been included in the pubs policy (TCC7).
Needs to be stronger protection for pubs, the policy tests (marketing and viability) are not strong enough to prevent conversion to residential use. Use of Article 4 Directions should also be considered.	Midland Terrace Resident's Group, The Hammersmith Society	Change proposed. The policy on protecting pubs has been strengthened to include clearer marketing requirements, exploration of diversification options and impact on character and viability

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Object to Policy TCC7 as it is overly prescriptive and would not be able to effectively respond to changing market circumstances.	Citrus Group and Fuller Smith & Turner	Change proposed. The policy includes the same level of prescription as included in many other Local Plans. The London Plan supports the protection of public houses, whilst the NPPF supports the protection of community uses, so the inclusion of a policy is both in general conformity with the London Plan and consistent with the NPPF. OPDC considers that the policy approach does reflect market conditions. The policy has however been slightly amended in response to other comments

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
		from Citrus Group and Fuller Smith and Turner.
The marketing period should ideally only be for 6 months and at most 12 months, which as been adopted as an approach in other policy areas.	Citrus Group and Fuller Smith & Turner	No change proposed. 24 months has been adopted as an appropriate marketing period and has been adopted elsewhere in Local Plans. As an example, Lewisham requires marketing for 36 months, Greenwich and Brent require marketing for 24 months, Southwark and Hounslow for 18 months, LBHF for 12 months, RBKC has an outright resistance to loss of pubs. OPDC considers that marketing for 24 months strikes the right balance between recognising that there may not be a market interest in the continued use of the facility as a pub, with the need for an appropriate marketing period for a relatively specialist type of use. As noted in the supporting text, 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.
"Competitively marketed" is not standard industry practice, doing so would adversely affect value and viability as the business would decline, staff would leave, it would be difficult to recruit etc	Citrus Group and Fuller Smith & Turner	No change proposed. Requiring marketing of the premises at appropriately set rent levels of standard industry practice and is a requirement set out in numerous Local Plans in response to numerous land uses.

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
"Appropriate publications" lacks definition and is poorly worded.	Citrus Group and Fuller Smith & Turner	No change proposed. It is inappropriate to specify the publications that an advert should be placed in as companies and publications might change, but the expectation would be on the applicant to market the property in publications that are well known and used by companies likely to be interested in acquirng public house premises.
Both "all reasonable efforts" and "all diversification options" are unreasonable and far too broad to constitute a reasonable policy. If marketing and viability evidence (as required by (a) and (d)) can be submitted, this part of the policy becomes redundant and should be removed.	Citrus Group and Fuller Smith & Turner	Change proposed. It is agreed that this policy strand potentially repeats strands covered elsewhere in the policy. It has been removed.
Should not refer to CAMRA guidance as this is one organisation with a specific focus. The test is not objective but subjective. It may be counter-productive to wider Development Plan objectives to enshrine what is essentially a wish-list into development control policy	Citrus Group and Fuller Smith & Turner	Change proposed. OPDC agrees that is not appropriate to necessarily refer to one interest group's publication. The key requirements in the viability test are in any case reflected in the other strands to the policy or elsewhere in the Local Plan.
The concept of "similar facilities" and "similar community environment" are too subjective and broad to form an appropriate policy test. This is a separate matter to a public house being unviable, and the policy as worded goes beyond a specific application for a specific site. There may be many other venues nearby, there may be none. The policy is too onerous as currently worded, and is therefore not justified or sound	Citrus Group and Fuller Smith & Turner	No change proposed. Public houses are a community facility and in accordance with the London Plan and NPPF (para 70), there is a need for OPDC to be satisfied that there are similar facilities in the local area that can provide for the needs of the population.

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
Alternative uses could themselves generate a positive impact and one beyond that currently provided by a pub, on the character and vitality of an area through the demolition and redevelopment of the existing site of a pub rather than seeking to retain the built fabric. This strand of the policy is at odds with the other elements which seek to preserve the provision of a viable public house as opposed to the built form of the building.	Citrus Group and Fuller Smith & Turner	No change proposed. All three public houses have been identified as heritage assets through OPDC's Heritage Strategy. In accordance with Policy TCC7 and D8, OPDC would expect any proposal to either retain the building's fabric, or as much of it as feasibly possible. It is unclear how this strand of the policy is at odds. The policy provides policy guidance on public houses, there are some elements that relate to the pub's viability and some that relate to the character and heritage of the building as a pub.
This strand of the policy assumes that a definitive conclusion can be reached through a public consultation exercise. There is no guarantee that this would be the case and that the consultation exercise could capture the views of the majority of the local community who may have no interest in the value of a public house.	Citrus Group and Fuller Smith & Turner	No change proposed. The response to the consultation would be treated on balance against the other considerations within this policy and other policy matters within the Local Plan and other development plan documents. Public consultations could take the form of door to door surveys in order to capture an appropriate cross-section of views and to avoid participation bias.
This strand of the policy is superfluous as there is already legislation that deals with this.	Citrus Group and Fuller Smith & Turner	Change proposed. It is agreed that this is superflous as it is dealt through other legislation. This policy strand has therefore been removed.
Support protection of public houses	Mayor of London, Hammersmith and Fulham Council, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
The policy is not effective as it does not include enough detail on public houses	Friary Park Preservation Group	No change proposed. OPDC considers that the policy provides sufficient deal on the areas' public houses to make the policy effective. Further detail on the areas' public houses can be found in OPDC's Heritage Strategy.

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What is the issue?	Who raised the issue?	What are we doing to address the issue?
Pubs policy should support the provision of new pubs as well as protection of existing	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Provision of new A4 class floorspace is covered in Policy TCC3.
There should be resistance of loss of pubs through an Article 4 direction	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. There is not considered to be a need because public houses have their own separate use class and demolition of public houses has been revoked from PD through legislative changes to the GPDO in 2017.
Should include greater detail on support for the retention of facilities, including planning gain funding and collaborative working with the boroughs for the Community Right to Build.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. Planning contributions need to satisfy the S106 tests, being necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development. They are unlikely to be appropriately used to support the protection of public houses. Community Right to Build is dealt with in Policy DI3.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Cultural Principles	• Ensure that appropriate protections for valued pubs are provided for in the Local Plan.
Heritage Strategy	• Recommends that the Castle Pub (Victoria Road), Grand Junction Arms, (Park Royal) and Fisherman's Arms (Old Oak Common Lane) be included as locally listed heritage assets by OPDC.

Rationale for any non-implemented recommendations

Supporting Study	Recommendations	Rationale for not including
N/A	N/A	N/A

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Other evidence base

Supporting Study	Recommendations
CAMRA Public House Viability Test	To assess the continued viability of a pub business the question to address is what the business could achieve if it were run efficiently by management committed to maximising its success. Assessing Trade Potential 1. Local trade • What is the location of the pub? Is it in a village, suburban area, town centre or isolated countryside? • What is the catchment area of the pub? • How many adults live within a one mile radius? • In rural areas, how many adults live within a ten mile radius? • Are there any developments planned for the area? Industrial, residential, strategic projects? • Is there a daytime working population? 2. Customer potential • Does the pub act as a focus for community activities? Sports teams, social groups, local societies, community meetings etc? • Is the pub in a well visited/popular location? Is it in a picturesque town or village, on a canal/river side, on a long distance footpath, or on a cycle route? • Does the pub appeal to those who regularly drive out to pubs? • Is tourism encouraged in the area? • Has the pub ever been included in any visitor or tourist guide? 3. Competition • In rural areas, how many pubs are there within a one mile radius and within a five mile radius? • In urban areas, how many pubs are there within reasonable walking distance? • Bearing in mind that people like to have choices, does the pub, by its character, location, design, potentially cater for different groups of people from those of its nearest competitor(s)? • If not, could the pub be developed to cater for different groups? 4. Flexibility of the site • Does the pub have unused rooms or outbuildings that could be brought into use? Function rooms, store rooms etc. • Is the site large enough to allow for building extensions? • Have planning applications ever been submitted to extend/develop the pub building? If yes, when and what was the outcome? • If planning consent was not available for building work, is any adjoining land suitable for any other use? Camping facility etc. • Has the pub been well maintained? 5. Parking • Is there access to appropriate numbers of car parking spaces? • If not, is there any scope for expansion? 6. Public Transport • Is there a bus stop outside or near the pub and/or a rail station within easy walking distance? • How frequent and reliable is public transport in the area?

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	• Has the pub made actual/potential customers aware of any public transport services available to/from it? • Are there taxi firms in the locality? • If yes, has the pub entered any favourable agreements with a local taxi firm? 7. Multiple Use • In light of government guidance through the National Planning Policy Framework (see the Appendix) what is the extent of community facilities in the local area – is there a shop, post office, community centre etc? • If the pub is the sole remaining facility within the area, is there scope for the pub to combine its function with that of a shop, post office or other community use, bed & breakfast or self-catering – especially in tourist areas? 8. Partial loss These questions come into play if the application seeks changes which would reduce the size of the pub or convert non-public areas, such as licensee accommodation, to other uses. • How would the proposals impact on the long-term financial health of the business? Would a smaller pub still be able to attract sufficient trade? Would the smaller size make it less attractive to customers e.g. because there were reduced facilities such as no meeting room, less parking, smaller garden? • Would any loss of licensee accommodation make the pub less attractive to potential future publicans? 9. Competition case studies • Are there any successful pubs in neighbouring areas of similar population density? • What factors are contributing to their success? 10. The business – past and present Having built up a picture of the business potential of the pub, it may be relevant to question why the pub is not thriving and why the owners are seeking change of use. • Does the pub management team have local support? Has the team taken steps in the last year or so to try engaging with the local community and has the dialogue affected the way the pub operates? • Has the pub been managed better in the past? Is there any evidence to support this? Are trading figures available for the last four years and/or from previous management regimes? • Have there been recent efforts to ensure viability? e.g. has the pub opened regularly and at convenient hours? Conversely, have hours/ facilities been reduced? • Has the focus/theme of the pub changed recently? • Is the pub taking advantage of the income opportunities offered by serving food? How many times a day is food served? How many times a week? Are catering facilities being optimised? • Has the rent/repair policy of the owner undermined the viability of the pub? • Does the pub offer an attractive range of drinks, especially quality real ales? • Are there any possible unclaimed reliefs? e.g. where rate abatement is not granted automatically but has to be claimed. • Does the pub promote itself effectively to potential customers? e.g. does it have an eye-catching and informative website? 11. The sale

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	• Where and how often has the pub been advertised for sale? Has it been advertised for at least 12 months? In particular, has the sale been placed with specialist licensed trade and/or local agents? • Has the pub been offered for sale as a going concern? Has the pub been offered at a realistic competitive price? (Information to enable this to be analysed can be obtained from The Publican and Morning Advertiser newspapers and from Fleurets, specialist Chartered Surveyors) • If yes, how many offers have been received? • Have any valuations been carried out? • Has the pub been closed for any length of time? Is it currently closed? • Does the sale price of the pub, as a business, reflect its recent trading?

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TCC8: Catalyst Uses

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
21	Investment in business should not be over-burdened by the combined requirements of planning policy expectations. Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing. In drawing up Local Plans, local planning authorities should: • set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth; support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances; • plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
	N/A No relevant guidance

London Plan (2016) Policies

Policy / paragraph reference	Policy and paragraph text
Chapter 3 London's People	
Policy 3.17 Health and social care facilities	F) Boroughs should promote the continued role and enhancement of London as a national and international centre of medical excellence and specialised facilities.
Policy 3.18 Education facilities	I) Boroughs should support and maintain London's international reputation as a centre of excellence in higher education.
Chapter 4 London's Economy	
Policy 4.6 Support for and enhancement of	C In preparing LDFs, boroughs should: seek to enhance the economic contribution and community role of arts, cultural, professional sporting and entertainment facilities.

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arts, culture, sport and entertainment	
Policy 4.10 New and emerging sectors	A The Mayor will, and boroughs and other relevant agencies and stakeholders should: b) give strong support for London's higher and further education institutions and their development, recognising their needs for accommodation and the special status of the parts of London where they are located, particularly the Bloomsbury/Euston and Strand university precincts

Draft London Plan (2017) Policies

Policy / paragraph reference	**Policy and paragraph text**
Chapter 1 Planning London's Future (Good Growth Policies)	
Policy GG2 Making the best use of land	To create high-density, mixed-use places that make the best use of land, those involved in planning and development must: C Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character.
Policy GG5 Growing a good economy	To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must: E Ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning.
Chapter 7 Heritage and Culture	
Policy HC5 Supporting London's culture and creative industries	A The continued growth and evolution of London's diverse cultural facilities and creative industries is supported. In Local Plans and through planning decisions, boroughs should: 1) protect existing cultural venues, facilities and uses where appropriate and support the development of new cultural venues in town centres and places with good public transport connectivity 2) identify and promote new, or enhance existing, locally-distinct clusters of cultural facilities, venues and related uses defined as Cultural Quarters, especially where they can provide an anchor for local regeneration and town centre renewal 5) seek to ensure that Opportunity Areas and large-scale mixed-use developments include new cultural venues and/or facilities and spaces for outdoor cultural events.
Chapter 6 Economy	
Policy E8 Sector growth opportunities and clusters	B London's global leadership in tech across all sectors should be maximised. D Innovation, including London's role as a location for research and development should be supported, and collaboration between businesses, higher education institutions and other relevant research and innovation organisations should be encouraged.

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	E London's higher and further education institutions and their development across all parts of London should be promoted. Their integration into regeneration and development opportunities to support social mobility and the growth of emerging sectors should be encouraged. F Clusters such as Tech City and MedCity should be promoted and the development of new clusters should be supported where opportunities exist, such as CleanTech innovation clusters, Creative Enterprise Zones, film, fashion and design clusters, and green enterprise districts such as in the Thames Gateway.

Mayor of London's Town Centres SPG

Policy / paragraph reference	**Policy and paragraph text**
SPG Implementation 1.2: Arts, Culture, Leisure and the Night Time Economy	Boroughs and town centre partners are encouraged to: enhance major clusters of visitor attractions and related infrastructure and develop visitor management plans to secure positive outcomes whilst addressing potential negative impacts arising from high visitor volumes
SPG Implementation 1.5 Social Infrastructure, Civic and Community Services	Boroughs and town centre partners are encouraged to: f consider improvement to social infrastructure as a catalyst for town centre regeneration
SPG Implementation 3.5 Markets	Boroughs and town centre partners are encouraged to: n harness the potential contribution of markets to tourism and regeneration through town centre strategies and locally tailored approaches to regeneration (as visitor attractions of local, city wide, national or international significance).

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	**Policy and paragraph text**
Policy TC5 Culture, sports and leisure facilities	Alternative policy option 1. Set a quantum threshold for culture, sports and leisure uses. 9.51 This option would identify an indicative floorspace figure for non A-class town centre uses such as for leisure, sports and culture. It would provide a clearer indication of the acceptable quantum of floorspace for other town centre uses, providing greater certainty to stakeholders. However, this approach would constrain the ability for these sorts of uses to aid with placemaking and could potential prevent a major

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	cultural, sports or leisure use from locating the area that could act as a catalyst for regeneration and provide a strategic cultural or leisure destination.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Catalyst uses: General support for catalyst uses in the area, with a number of suggestions for types of catalyst uses that could be supported and the criteria that could be applied for assessing applications. Opposition and support for a proposed sports stadium in the area. Opposition focussed on a sports stadium's significant infrastructure requirements and its impact on amenity. Support focussed on a sports stadium's ability to support placemaking and potentially justify higher densities.	General support: Old Oak Interim Forum, Old Oak Park (DP9), The Hammersmith Society, Hammersmith and Fulham Historic Buildings Group, 6 residents, 1 local business Oppose a sports stadium: Midland Terrace Resident's Group, Old Oak Interim Forum, Old Oak Park (DP9), Grand Union Alliance, 1 local resident (in opposition) Support a sports stadium: QPR, 7 local residents, 2 local businesses and 2,185 standard QPR supporter responses	Noted. The Local Plan supports the potential for catalyst uses in the area, in Policy SP6. The Local Plan now includes a criteria based policy (TCC8) to assess the acceptability of different catalyst uses. This approach will ensure that for any future catalyst use to be appropriate it will be assessed against a range of policy requirements. This policy will be supported by evidence from a Catalyst Uses Study.
Support for education uses: Some support for both further and higher education in the OPDC area.	Grand Union Alliance, Midland Terrace Resident's Group, Old Oak Interim Forum, Ealing Council	Noted. OPDC is supportive of higher education facilities, and recognise that these, amongst other uses, may provide wider benefit in terms of being a catalyst use which promotes activity and vibrancy. High education facilities would be likely to be considered as catalyst uses. Catalyst uses are supported in Policy SP6, but would be required to be assessed against relevant Local Plan policies, including the specific catalyst uses criteria in Policy TCC8.
Sports stadium: The Spatial Vision and Objectives should support the delivery of a stadium to act as a community hub and catalyst	20 local residents and QPR (NQP Development Services)	Change proposed. The spatial vision does not directly reference the potential for a stadium, but identifies the area as a home

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for wider development.		to a diverse and intense mix of uses. The vision narratives expand on this and identify that the area will become a destination for people from across London and the UK that will be home to a mix of cultural and leisure uses. Policy SP6 (Places and Destinations) supports the potential for catalyst uses in the area, which includes sports stadia. Policy TCC8 sets out the detailed criteria against which catalyst uses would be assessed.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Should identify the delivery of a football stadium	Rory Chapman	No change proposed. The Local Plan supports the potential for catalyst uses and Policy TCC8 identifies that sports stadia fall within this definition. Any proposal would need to accord with the requirements set out in Policy TCC8 and other relevant policies in the Local Plan and other Development Plan Documents and material planning considerations.
Agree with the approach set out in this policy in part but it could mean that all major developments need to submit a catalyst uses statement unless the policy clarifies it does not apply to site allocations, but always applies to sports/stadia facilities or other 'extraordinary' uses such as conference facilities. It should not apply to more regular employment facilities or social infrastructure	Old Oak Park Ltd	Change proposed. Wording has been inserted in the supporting text to TCC4 and TCC8 to clarify that the catalyst uses policy will not be applied to infrastructure identified in OPDC's IDP as this infrastructure is necessary to meet the needs of development and make it acceptable in planning terms. Wording has also been inserted in the policy to clarify that where it is a cluster of uses or buildings, the policy requirement for a catalyst uses statement need only be applied where the cluster of buildings that together create a single facility - i.e. a proposal for town centre uses as part of a high street would not need to submit a town centre uses statement unless they would be creating a shopping centre.

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Reference should be made to impact assessments in the supporting text to TCC8	Royal Borough of Kensington and Chelsea	No change proposed. Impact assessments would only be required for retail, office or leisure uses - some catalyst uses may not fall within these definitions.
Support Policy TCC8	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Would not support a sports stadium being delivered. The station interchange should suffice as a means of bringing people to the area.	Old Oak Interim Forum, Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Local Plan does not provide support or objection to a sports stadium, but would require such a proposal to submit a Catalyst Uses Statement in accordance with Policy TCC8, and equally, would be assessed against other relevant development plan policy and other material planning considerations.
Under 'complements the wider environment' should add that "It does not detract from the quality and use of open and green spaces, leisure and retail functions, as well as active frontages"	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The policy requirements relating to open space are dealt with elsewhere in the Local Plan, in SP8 and EU1. Impact on leisure and retail is dealt with in Policy TCC1. Impact assessments would only be required for uses falling within retail, leisure or office uses, in accordance with the NPPF. Active frontages are dealt with within the quantitative criteria under the objective to be 'part of a holistic offer'.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Catalyst Uses Study	• • Catalyst uses are likely to fall within four board categories: o Sports stadia and facilities; o Retail and leisure; o Culture, education and health; or o Business and conference space. • Catalyst uses could be small or large, but OPDC should look to set a threshold for the application of planning policy criteria of either in excess of 10,000sqm and/or 0.25 hectares of land • The review of case studies identifies both positives and negatives for catalyst uses. The study identifies that rather than one

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	catalyst, a series of multiple, complementary catalysts are likely to best support the wider regeneration aspirations of the area. • The study identifies a series of planning criteria against which applications should be assessed. These are structured • around five overarching objectives for any catalyst: o To be part of a holistic offer; o To be financially sustainable; o To complement the wider environment; o To help generate momentum; and o To leverage HS2 and Crossrail.
Retail and Leisure Need Study	• In OAs such as OPDC, there could be a further sporadic high demand for user specific sports and leisure facilities or other anchor/catalyst uses, potentially providing high footfall generating • town centre uses that will accommodate a significant quantum of floorspace. Such uses are not likely to be reliant solely on the needs of the development; nor does the evidence point to a clear deficiency in such uses. However, it is appreciated that the area will be highly accessible. Therefore, subject to ensuring a balanced mix of uses in the new development, there is no reason to preclude such uses coming forward if the aim for town centre uses to 'meet the needs of the development' is not undermined.

Rationale for any non-implemented recommendations

Supporting Study	**Recommendations**	Rationale for not including
N/A	N/A	N/A

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TCC9: Meanwhile Uses

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
23	Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should: • retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive;
70	To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: • plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Ensuring the vitality of town centres	
Title: What should a town centre strategy contain? **Paragraph:** 003 **Reference ID:** 2b-003-20140306 **Revision Date:** 06 03 2014	Any strategy should be based on evidence of the current state of town centres and opportunities to meet development needs and support their viability and vitality. Strategies should answer the following questions: • what is the appropriate and realistic role, function and hierarchy of town centres in the area over the plan period? This will involve auditing existing centres to assess their role, vitality, viability and potential to accommodate new development and different types of development. This assessment should cover a 3 to 5 year period, but should also take the lifetime of the Local Plan into account and be regularly reviewed • what is the vision for the future of each town centre? This should consider what the most appropriate mix of uses would be to enhance overall vitality and viability • what complementary strategies are necessary or appropriate to enhance the town centre and help deliver the vision for its future, and how can these be planned and delivered? Strategies should identify changes in the hierarchy of town centres, including where a town centre is in decline. In these

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	cases, strategies should seek to manage decline positively to encourage economic activity and achieve an appropriate mix of uses commensurate with a realistic future for that town centre.
Title: How should viability be promoted? **Paragraph:** 012 **Reference ID:** 2b-012-20140306 **Revision Date:** 06 03 2014	The sequential test seeks to deliver the government's 'town centre first' policy. However as promoting new development on town centre locations can be more expensive and complicated than building elsewhere local planning authorities need to be realistic and flexible in terms of their expectations.

London Plan (2016) Policies

Policy / paragraph reference	**Policy and paragraph text**
Chapter 3 London's People	
Policy 3.19 Sports Facilities	B Development proposals that increase or enhance the provision of sports and recreation facilities will be supported. Proposals that result in a net loss of sports and recreation facilities, including playing fields should be resisted. Temporary facilities may provide the means of mitigating any loss as part of proposals for permanent re-provision. Wherever possible, multi-use public facilities for sport and recreational activity should be encouraged. The provision of sports lighting should be supported in areas where there is an identified need for sports facilities to increase sports participation opportunities, unless the sports lighting gives rise to demonstrable harm to local community or biodiversity.
Chapter 4 London's Economy	
Policy 4.6 Support for enhancement of arts, culture, sport and entertainment	C In preparing LDFs, boroughs should: b) support the temporary use of vacant buildings for performance and creative work

Draft London Plan (2017) Policies

Policy / paragraph reference	**Policy and paragraph text**
Chapter 2 Spatial Development Patterns	
Policy SD8 Town centres: development principles and Development Plan	B In Development Plans, boroughs should: 6) support flexibility for temporary or 'meanwhile' uses of vacant properties.

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Documents	
Chapter 3 Design	
Policy D7 Public realm	Development Plans and development proposals should: K Create an engaging public realm for people of all ages, with opportunities for formal and informal play and social activities during the daytime, evening and at night. This should include identifying opportunities for the meanwhile use of sites in early phases of development to create temporary public realm.
Chapter 4 Housing	
Policy H4 Meanwhile use	Boroughs are encouraged to identify opportunities for the meanwhile use of sites for housing to make efficient use of land while it is awaiting longer-term development.
Chapter 7 Heritage and Culture	
Policy HC5 Supporting London's culture and creative industries	A The continued growth and evolution of London's diverse cultural facilities and creative industries is supported. In Local Plans and through planning decisions, boroughs should: 4) consider the use of vacant properties and land for pop-ups or meanwhile uses for cultural and creative activities during the day and at night-time to stimulate vibrancy and viability and promote diversity in town centres, Cultural Quarters and other areas C Where a Creative Enterprise Zone has been identified, Local Plan policies should: 4) encourage the temporary use of vacant buildings and sites for creative workspace and activities

Mayor of London's Culture and the Night-Time Economy SPG

Policy / paragraph reference	**Policy and paragraph text**
04 Creating a more diverse and inclusive night-time culture and economy	4.9 Opportunities for diversification can also arise through the temporary, flexible and 'meanwhile' use of vacant or under-used buildings and by re-purposing buildings. Extending activities beyond the normal working day can also mean premises are better used, particularly those that would otherwise remain idle for most of a 24 hour period. 4.10.The NPPF27 refers to planning positively for provision and use of shared space. London Plan Policy 4.6Cb supports the temporary use of vacant buildings for performance and creative work. Case Study 5: The Printworks, Canada Water, LB Southwark provides an example of a major repurposing of a building into a cultural events space with evening and night-time use

Mayor of London's Town Centres SPG

Policy / paragraph reference	**Policy and paragraph text**
SPG Implementation 5.2 Brining	Boroughs and town centre partners are encouraged to: a) bring vacant/under-used properties back into use to help stimulate vitality and viability, promote diversity and choice, deliver new homes,

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vacant and under-used sites and properties back into use	boost town centre attractiveness and kickstart local growth b) adopt a more flexible approach to secure temporary uses of vacant premises including the use of temporary permissions, Local Development Orders and "meanwhile leases".

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Policy and paragraph text
Policy TC3: Vibrancy	b) Encourage the provision of meanwhile uses in early development phases (see OSP5); No alternative policy proposed

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Meanwhile Uses: There was support for requiring developers to submit a meanwhile strategy, but that the Local Plan should set a threshold for the size of schemes required to submit one	Brent Council, Old Oak Park (DP9), Grand Union Alliance, Midland Terrace Resident's Group, Old Oak Interim Forum, Diocese of London, Old Oak Park (DP9), TITRA, London Sustainable Development Commission, 2 local residents	Change proposed. The revised Local Plan (policy TCC9) requires a meanwhile feasibility studies to be submitted by major development proposals (10 or more residential units or 1000sqm+ of non-residential floorspace). If meanwhile uses are feasible, then the policy requires the submission of a meanwhile strategy.
Meanwhile uses should only be supported where they are viable and do not impact on the monies available for delivering permanent facilities, particularly in the case of community uses	2 Residents	Change proposed. The Local Plan now includes a policy on meanwhile uses. The policy recognises the importance of meanwhile uses not impacting on the delivery of permanent structures and that measures should be put in place to support meanwhile uses occupying permanent spaces in the development.
Temporary open space - should be subject to feasibility. Amend policy to:	Old Oak Park	Change proposed. Policies SP6 and TCC9 require meanwhile uses to support

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Amended to read "deliver temporary public open spaces that contribute to the vitality, character and activation of an area and supports the delivery of permanent development where feasible to do so."		the longer term permanent uses planned for an area.

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Requiring mechanisms to allow meanwhile uses to occupy permanent developments will dissuade developers from proposing meanwhile uses.	Old Oak Park Ltd	Change proposed. The requirement is for the strategy to set out proposed approaches to supporting this. It is not a necessity that an occupier of a meanwhile use should be incorporated into new development proposals as it will not be suitable or viable in all cases. However, where appropriate, OPDC would expect landowners to try and support the potential for meanwhile uses to occupy permanent development, through mechanisms such as staggered rentals, business support and through right of first refusal. Wording in the supporting text has been revised to clarify that the provision of permanent space for meanwhile uses is not a requirement, but instead, is something that would need to be considered and mechanisms worked through with developers.
Should require meanwhile uses not to compromise longer-term plans. The policy as currently worded is too loose and could compromise longer term delivery.	Ealing Council	No change proposed. The need for meanwhile uses to not compromise the deliverability of key sites is outlined within strand a)iii).
Meanwhile uses should not form part of the consideration of a planning application at the initial stage as they are not relevant to the acceptability of the longer term development proposals.	Old Oak Park Ltd	No change proposed. OPDC wants to incentivise the optimised use of land, particularly where development will be phased over many years. OPDC therefore considers it important to understand the potential feasibility for meanwhile uses at application stage, so that a meanwhile strategy can be secured through

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		planning agreement or condition.
Meanwhile uses should be a priority as many development sites will not be brought forward until post 2026	David Craine	Noted. OPDC is supportive of meanwhile uses subject to them according with Policy TCC9 and other relevant development plan policies and material considerations.
Support recognition of artists and potential meanwhile uses	ArtWest	Noted.
Support Policy TCC9	Hammersmith Society, Pentecostal City Mission, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
The policy should be applied positively and impact on delivery of site allocations not used as an excuse by developers	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.
Proposals for meanwhile uses should also mitigate impacts on neighbouring town centres	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. If a meanwhile use was large enough and of the appropriate use class to warrant an impact assessment, this would be governed through the requirements outlined in Policy TCC1 and potentially through Policy TCC8. Other relevant policies in the Local Plan would also be applied to a meanwhile use.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Cultural Principles	• Recommendation 18: We will work with developers to encourage meanwhile uses and provide best practice case studies as part of the Cultural Strategy

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Precedents Study	Outlines some examples of successful meanwhile uses and lesson learnt, including: • PLACE/Ladywell temporary emergency housing scheme; • Workshop East – shared workshop; • Box Park, Shoreditch High Street • Mile End Floating Market • Eastern Curve Gardens • Frontside Skate Gardens
Retail and Leisure Needs Study	• A series of policies should be put in place to ensure a high quality of retail that supports placemaking, including the support for independent retailers, measures to mitigate impacts on existing town centres and support for meanwhile uses.

Rationale for any non-implemented recommendations

Supporting Study	**Recommendations**	Rationale for not including
N/A	N/A	N/A

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TCC10: Visitor Accommodation

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
23	Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should: • allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites;
58	Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics. Planning policies and decisions should aim to ensure that developments: • establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Ensuring the vitality of town centres	
Title: What should local planning authorities consider when planning for tourism? **Paragraph:** 007 **Reference ID:** 2b-007-20140306 **Revision Date:** 06 03 2014	Tourism is extremely diverse and covers all activities of visitors. Local planning authorities, where appropriate, should articulate a vision for tourism in the Local Plan, including identifying optimal locations for tourism. When planning for tourism, local planning authorities should: • consider the specific needs of the tourist industry, including particular locational or operational requirements; • engage with representatives of the tourism industry; • examine the broader social, economic, and environmental impacts of tourism; • analyse the opportunities for tourism to support local services, vibrancy and enhance the built environment; and • have regard to non-planning guidance produced by other government departments. Local planning authorities may also want to consider guidance and best practice produced by the tourism sector.

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London Plan (2016) Policies

Policy / paragraph reference	Policy and paragraph text
Chapter 4 London's Economy	
Policy 4.5 London's visitor infrastructure	A The Mayor will, and boroughs and relevant stakeholders should: a) support London's visitor economy and stimulate its growth, taking into account the needs of business as well as leisure visitors and seeking to improve the range and quality of provision especially in outer London b) seek to achieve 40,000 net additional hotel bedrooms by 2036, of which at least 10 per cent1 should be wheelchair accessible c) ensure that new visitor accommodation is in appropriate locations: – beyond the Central Activities Zone (CAZ) it should be focussed in town centres and opportunity and intensification areas, where there is good public transport access to central London and international and national transport termini d) support provision for business visitors, including high quality, large scale convention facilities in or around the CAZ Planning decisions B Developments should: a) contribute towards the hotel provision target and ensure that at least 10 per cent of bedrooms are wheelchair accessible b) be consistent with the strategic location principles set out above c) not result in the loss of strategically important hotel capacity2. C LDFs should: a) seek to ensure that all new visitor accommodation meets the highest standards of accessibility and inclusion and encourage applicants to submit an accessibility management plan with their proposals b) promote high quality design of new visitor accommodation so that it may be accredited by the National Quality Assurance Scheme c) identify opportunities for renovation of the existing visitor accommodation stock d) promote and facilitate development of a range of visitor accommodation, such as hotels, bed and breakfast accommodation, self-catering facilities, youth hostels and camping and caravan sites e) support and encourage development of good quality budget category hotels, especially in outer London.

Draft London Plan (2017) Policies

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Policy / paragraph reference	Policy and paragraph text
Chapter 2 Spatial Development Patterns	
Policy SD6 Town centres	G Tourist infrastructure, attractions and hotels in town centre locations, especially in outer London, should be enhanced and promoted
Chapter 6 Economy	
Policy E10 Visitor infrastructure	A London's visitor economy and associated employment should be strengthened by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure, particularly to parts of outer London well-connected by public transport, taking into account the needs of business as well as leisure visitors. B The special characteristics of major clusters of visitor attractions and the diversity of cultural infrastructure in all parts of London should be conserved, enhanced and promoted. C A sufficient supply of serviced accommodation for business visitors should be maintained, and the provision of high-quality convention facilities in town centres and in and around the CAZ should be supported. D Within the CAZ, strategically important serviced accommodation should be promoted in Opportunity Areas, with smaller-scale provision in the commercial core parts of the CAZ (see Policy SD5 Offices, other strategic functions and residential development in the CAZ), subject to the impact on strategic office space. Intensification of the provision of serviced accommodation in areas of existing concentration should be resisted, except where this will not compromise local amenity or the balance of local land uses. E In outer London and those parts of inner London outside the CAZ, serviced accommodation should be promoted in town centres and within Opportunity Areas where they are well-connected by public transport, particularly to central London. F The role of apart-hotels and short-term lettings should be supported whilst ensuring that they do not compromise housing provision (see Policy H11 Ensuring the best use of stock). G To ensure sufficient choice for people who require an accessible bedroom, development proposals for serviced accommodation should provide either: 1) 10 per cent of new bedrooms to be wheelchair-accessible; OR 2) 15 per cent of new bedrooms to be accessible rooms in accordance with the following requirements: a) one room or five per cent, whichever is the greater, with a wheelchair-accessible shower room for independent use b) a further one room or one per cent, whichever is the greater, with a fixed tracked-hoist system or similar system with the same degree of convenience and safety as an en-suite bathroom for assisted use, and a connecting door to an adjoining (standard) bedroom for use by an assistant or companion c) one room or five per cent, whichever is the greater with an en-

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		suite shower room to meet the requirements of ambulant disabled people d) four per cent of bedrooms easily adaptable and large enough for easy adaptation to be wheelchair-accessible (with en-suite) if required in the future, and incorporate all the correct dimensions and sanitary layouts and be structurally capable of having grab-rails installed quickly and easily if required.

Mayor of London's Town Centres SPG

Policy / paragraph reference	Policy and paragraph text
SPG Implementation 1.2 – Arts, culture, leisure and the night time economy	k) enhance major clusters of visitor attractions and related infrastructure and develop visitor management plans to secure positive outcomes whilst addressing potential negative impacts arising from high visitor volumes l) improve the availability and accessibility of visitor accommodation drawing on SPG guidance on accessible and inclusive hotel design and accessibility management plans.

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Policy and paragraph text
Policy TC6: Visitor Accommodation	Alternative policy option 9.59 No reasonable alternative policy options have been identified, as alternatives would not be consistent with the NPPF or in general conformity with the London Plan.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Policy should also include reference to ensuring visitor accommodation does not compromise the supply of conventional homes.	Brent Council	Change proposed. This has been included as a criteria in the policy (Policy TCC10).
Policy should also be clear that visitor accommodation cannot become permanently occupied, and conditions will be applied accordingly	Brent Council	Change proposed. This has been included as a criteria in the policy (Policy TCC10).

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Recommend that planning applications are also assessed against guidance on visitor accommodation and facilities in BS 8300: 2009.	Hammersmith and Fulham Disability Forum	No change proposed. This requirement is covered in London Plan policy 7.2 and therefore does not need repeating in OPDC's Local Plan as it already forms part of OPDC's Development Plan.
Should direct hotel accommodation to town centres and areas of high public transport access	Ealing Council	No change proposed. This is a requirement of the visitor accommodation policy (now policy TCC10).

Regulation 19(1) consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Support policy TCC10	T.A.S.B. Investments Limited, A40 Data Centre B.V	Noted.
Reference to London's need for 40,000 bedrooms should be removed as it does not relate specifically to the OPDC area and is soon to be out of date	Mayor of London	Change proposed. Reference to the number of bedrooms has been removed from the policy. The figures have been updated with the new London Plan figures in the supporting text.
Broadly support the policy but it may impact on the supply of land available for other requirements in the Plan	Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Change proposed. The policy did identify the need to not compromise the supply of housing, but this has been amended to require that proposals would not compromise the delivery of housing targets and would support the delivery of jobs targets, particularly within site allocations.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Retail and Leisure Needs Study	7.2.7: As explained above, whilst there is not necessarily an existing deficiency in retail and leisure uses (mainly food and beverage) in the network of centres, there is an apparent gap in the provision of centres that have a significant number of arts, cultural and tourism uses, such as theatres, museums, galleries and concert halls, hotels and conference facilities. Policy 4.6 of the London Plan provides support and enhancement for arts culture, sport and entertainment uses, whilst the Mayor's Cultural Strategy recognises the role cultural uses can plan in regeneration

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Rationale for any non-implemented recommendations

Supporting Study	**Recommendations**	Rationale for not including
N/A	N/A	N/A

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TCC11: Night Time Economy Uses

Legislation, Policy and Guidance Context

National Planning Policy Framework (2012) (NPPF)

Policy / paragraph reference	Policy and paragraph text
23	Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should: recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;
161	Local planning authorities should use this evidence base to assess: • the capacity of existing centres to accommodate new town centre development;

National Planning Practice Guidance (NPPG)

Policy / paragraph reference	Policy and paragraph text
Ensuring the Vitality of Town Centres	
Title: What should a town centre strategy contain? **Paragraph:** 003 **Reference ID:** 2b-003-20140306 **Revision Date:** 06 03 2014	Any strategy should be based on evidence of the current state of town centres and opportunities to meet development needs and support their viability and vitality. Strategies should answer the following questions: • what is the appropriate and realistic role, function and hierarchy of town centres in the area over the plan period? This will involve auditing existing centres to assess their role, vitality, viability and potential to accommodate new development and different types of development. This assessment should cover a 3 to 5 year period, but should also take the lifetime of the Local Plan into account and be regularly reviewed • what is the vision for the future of each town centre? This should consider what the most appropriate mix of uses would be to enhance overall vitality and viability • what complementary strategies are necessary or appropriate to enhance the town centre and help deliver the vision for its future, and how can these be planned and delivered?
Health and Wellbeing	
Title: What is a healthy community? **Paragraph:** 005	A healthy community is a good place to grow up and grow old in. It is one which supports healthy behaviours and supports reductions in health inequalities. It should enhance the physical and mental health of the community and, where appropriate, encourage:

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Reference ID: 53-005-20140306 **Revision Date:** 06 03 2014	The creation of healthy living environments for people of all ages which supports social interaction. It meets the needs of children and young people to grow and develop, as well as being adaptable to the needs of an increasingly elderly population and those with dementia and other sensory or mobility impairments.

London Plan (2016) Policies

Policy / paragraph reference	**Policy and paragraph text**
Chapter 2 London's Places	
Policy 2.7 Outer London: Economy	A The Mayor will, and boroughs and other stakeholders should, seek to address constraints and opportunities in the economic growth of outer London so that it can rise above its long term economic trends by: • k supporting leisure, arts, cultural and tourism and the contribution that theatres and similar facilities and the historic environment can make to the outer London economy, including through proactive identification of cultural quarters and promotion and management of the night time economy
Chapter 4 London's Economy	
Policy 4.6 Support for enhancement of arts, culture, sport and entertainment	C In preparing LDFs, boroughs should: f) identify, manage and co-ordinate strategic and more local clusters of evening and night time entertainment activities to – address need, – provide public transport, policing and environmental services; and – minimise impact on other land uses taking account of the cumulative effects of night time uses and saturation levels beyond which they have unacceptable impacts on the environmental.
Chapter 7 London's Living Spaces and Places	
Policy 7.3 Designing out Crime	B Development should reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating. In particular: • c design should encourage a level of human activity that is appropriate to the location, incorporating a mix of uses where appropriate, to maximize activity throughout the day and night, creating a reduced risk of crime and a sense of safety at all times.

Draft London Plan (2017) Policies

Policy / paragraph reference	**Policy and paragraph text**
Chapter 1 Planning London's Future	
Policy GG1 Building strong and inclusive communities	To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must: D Promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction

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	during the daytime, evening and night time.
Chapter 2 Spatial Development Patterns	
Policy SD6 Town centres	A London's varied town centres and their vitality and viability should be promoted and enhanced as: • 1) strong, resilient, accessible, inclusive and viable hubs for a diverse range of uses including employment, business space, shopping, culture, leisure, night-time economy, tourism, civic, community, social infrastructure and residential development F The management of vibrant daytime, evening and night-time activities should be promoted to enhance town centre vitality and viability, having regard to the role of individual centres in the night-time economy (see Figure 7.7 and Table A1.1) and supporting the development of cultural uses and activity.
Policy SD7 Town centre network	G Boroughs and other stakeholders should have regard to the broad policy guidelines for individual town centres in Annex 1 including: • 3) night-time economy roles (see Policy HC6 Supporting the night-time economy)
Policy SD8 Town centres: development principles and Development Plan Documents	B In Development Plans, boroughs should: • 1) define the detailed boundary of town centres in policy maps including the overall extent of the town centre (taking into consideration associated high streets which have particular economic or social value) along with specific policy-related designations such as primary shopping areas, primary and secondary frontages and night-time economy in light of demand/capacity assessments for town centre uses and housing
Chapter 3 Design	
Policy D12 Agent of Change	A The Agent of Change principle places the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development. B Boroughs should ensure that planning decisions reflect the Agent of Change principle and take account of existing noise-generating uses in a sensitive manner when new development, particularly residential, is proposed nearby. C Development proposals should manage noise and other potential nuisances by: 1) ensuring good acoustic design to mitigate and minimise existing and potential impacts of noise generated by existing uses located in the area 2) exploring mitigation measures early in the design stage, with necessary and appropriate provisions secured through planning obligations 3) separating new noise-sensitive development where possible from existing noise-generating businesses through distance, screening, internal layout, sound-proofing and insulation, and other acoustic design measures. D Development should be designed to ensure that established noise generating venues remain viable and can continue or grow without unreasonable restrictions being placed on them. E New noise-generating development, such as industrial uses, music venues, pubs, rail infrastructure, schools and sporting venues proposed

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	close to residential and other noise-sensitive development should put in place measures such as soundproofing to mitigate and manage any noise impacts for neighbouring residents and businesses. F Boroughs should refuse development proposals that have not clearly demonstrated how noise impacts will be mitigated and managed.
Chapter 7 Heritage and Culture	
Policy HC5 Supporting London's culture and creative industries	A The continued growth and evolution of London's diverse cultural facilities and creative industries is supported. In Local Plans and through planning decisions, boroughs should: 4) consider the use of vacant properties and land for pop-ups or meanwhile uses for cultural and creative activities during the day and at night-time to stimulate vibrancy and viability and promote diversity in town centres, Cultural Quarters and other areas
Policy HC6 Supporting the night-time economy	A Boroughs should develop a vision for the night-time economy, supporting its growth and diversification, in particular within strategic areas of night-time activity (see Table A1.1 and Figure 7.7), building on the Mayor's Vision for London as a 24-Hour City. B In Development Plans, town centre strategies and planning decisions, boroughs should: 1) promote the night-time economy, where appropriate, particularly in the Central Activities Zone, strategic areas of night-time activity, town centres, and where public transport such as the Night Tube and Night Buses are available 2) improve inclusive access and safety, and make the public realm welcoming for all night-time economy users and workers 3) diversify the range of night-time activities, including extending the opening hours of existing daytime facilities such as shops, cafés, libraries, galleries and museums 4) address the cumulative impact of high concentrations of licensed premises and their impact on anti-social behaviour, noise pollution, health and wellbeing and other impacts for residents, and seek ways to diversify and manage these areas 5) ensure night-time economy venues are well-served with safe and convenient night-time transport 6) protect and support evening and night-time cultural venues such as pubs, night clubs, theatres, cinemas, music and other arts venues. C Promoting management of the night-time economy through an integrated approach to planning and licensing, out-of-hours servicing and deliveries, safety and security, and environmental and cleansing services should be supported. Boroughs should work closely with stakeholders such as the police, local businesses, patrons, workers and residents.

Mayor of London's Culture and Night Time Economy SPG (2017)

Policy / paragraph reference	**Policy and paragraph text**
03 Sustaining existing venues and providing	3.6. Planning policies and their implementation have an important role to play in helping to correct these market impacts.

new facilities	3.7. In line with the NPPF23, boroughs should recognise town centres as the heart of their communities and allocate a range of suitable sites to meet the needs of uses including leisure, tourism and cultural. Planning policies and decisions should guard against the unnecessary loss of valued social, recreational and cultural facilities and services. They should ensure that such facilities are able to develop and modernise and are retained for the benefit of the community. 3.8. Policy 4.6 of the London Plan sets out the Mayor's approach to supporting London's arts, cultural, sporting and entertainment enterprises. Policy 4.7 provides principles for assessing the need and capacity for culture and leisure development in town centres. For existing venues, boroughs should enhance and protect creative work and performance spaces and related facilities in areas of defined need (4.6Ca). 3.9. Under Policy 3.1B, facilities and services that meet the needs of particular groups and communities should be protected. Loss of these facilities without adequate justification or replacement should be resisted. Boroughs should ensure that this protection includes meeting the needs of those groups and communities who make use of cultural facilities in the evening and night time. This includes, but is not limited to, younger people and the LGBT community. An exceptional example of a cultural venue associated with a particular community is described in Case Study 2: Royal Vauxhall Tavern, LB Lambeth. Protection of the premises included a grade II listing as a 'living monument' to the development of gay identity over 150 years. 3.10. London's heritage and historic environment makes a significant and valuable contribution to the city's cultural offer as many cultural facilities are also heritage assets. The heritage or townscape significance of a cultural venue, facility or area in addition to its cultural value can offer further protection through the planning system. Case Study 3: Denmark Street, LB Camden shows how an area known as Tin Pan Alley was designated a conservation area. This has enabled the London Borough of Camden to protect and promote the activities that help make up the area's cultural identity. 3.11. For new premises, site selection should follow the sequential approach, focusing on sites within town centres (4.6B and 4.7B). New arts, culture, sport and entertainment facilities should address deficiencies. Developments should provide a cultural focus to foster more sustainable communities (4.6Bc). 3.12. Boroughs should develop policies for existing and new cultural facilities. This includes designating cultural quarters to accommodate new activities as well as providing arts and cultural facilities in major mixed use developments. Boroughs should also promote and develop both existing and new cultural attractions. They should identify, manage and coordinate strategic and more local clusters of evening and night-time entertainment activities (4.6C). 3.13. The extent to which night-time activities should be encouraged to develop in a specified area or be spread more widely will depend on local circumstances. However, boroughs should generally encourage a

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	wide range of night-time activities including the expansion of existing culture and leisure venues (London Plan para 4.39). The Town Centres SPG provides further guidance on the implementation of London Plan policies for live music venues. This includes recognising live music venues as part of a broader cultural offer which contributes to night-time diversity in town centres.
04 Creating a more diverse and inclusive night-time culture and economy	4.4. Under London Plan policy 2.15Dc, boroughs should proactively manage the changing roles of town centres, especially those with surplus retail and office floor space, and consider the scope for consolidating and strenthening them by encouraging a wider range of services and promoting diversification. High density, residential-led mixed use development is seen as one way of doing this. However, care should be taken in the location, design and management of town centre housing in relation to nighttime activities (para 2.72A). The night-time context of a locality should be factored in at the start of the design process for town centre housing. 4.5. Policy 4.8Bg seeks clusters of uses to be managed having regard to their positive and negative impacts on London Plan priorities which include the broader diversity of offer. Such clusters include the 70 strategically important clusters of night-time activities listed on page 69. 4.6. Diversification of uses and opening times can enable a nighttime mix of activities, for example late night markets and museums extending their opening hours. This can help attract a wider range of visitors, including those who feel excluded from alcohol- focussed entertainment activities. It can also decrease crime, anti-social behaviour and the fear of crime. 4.7. Taking into account this policy basis, the benefits of diversifying the range of evening and nighttime activities in a centre should be explored. This can include extending opening hours of existing daytime facilities such as shops, cafes, medical facilities, libraries and theatres to integrate leisure and other uses. This can promote customer cross-over and build bridges between the day and nighttime economies. 4.8. Diversification can also involve introducing new activities including by creating cultural quarters (London Plan Policy 4.6Cc). This may be associated with an anchor activity, like a theatre, cinema, or artist studios or specialist retail functions like galleries, antiques or craft markets. It can extend across a whole town centre to create mutual benefits for other town centre activity. Part of the mix can also include positive city centre events like late night shopping, night markets, food markets, civic celebrations, light nights, illuminated park nights, carnivals and fairs. 4.9. Opportunities for diversification can also arise through the temporary, flexible and ‘meanwhile’ use of vacant or under-used buildings and by re-purposing buildings. Extending activities beyond the normal working day can also mean premises are better used, particularly those that would otherwise remain idle for most of a 24 hour period. 4.10.The NPPF refers to planning positively for provision and use of shared space. London Plan Policy 4.6Cb supports the temporary use of

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	vacant buildings for performance and creative work. Case Study 5: The Printworks, Canada Water, LB Southwark provides an example of a major repurposing of a building into a cultural events space with evening and night-time use.

Mayor of London's Town Centres SPG

Policy / paragraph reference	Policy and paragraph text
SPG Implementation 1.2	Boroughs and town centre partners are encouraged to: f) manage the night time economy (NTE) reconciling economic benefits and the concerns of local residents g) promote inclusive access to arts, culture, leisure and the night time economy

Local Plan Regulation 18 Draft Policy Options

Policy / paragraph reference	Policy and paragraph text
Policy TC7: Evening night time economy	Alternative policy option 1. Take a more flexible approach to hours of operation for night-time economy uses in Old Oak, particularly in vicinity of Old Oak Common station. 9.64 OPDC is promoting the Old Oak area as a destination for catalyst uses, including culture, sports and leisure uses and other night-time economy uses. To support this aspiration, a more flexible approach to the hours of operation for night-time economy uses could be taken, particularly in close vicinity to the Old Oak Common station and along Old Oak High Street. Such uses and new homes being delivered in the Old Oak area could be designed to minimise the noise and light impacts of these late night uses; however, consideration may need to be given to the cumulative impact of these uses if a more flexible approach to hours of operation were to be taken. Views are sought on this alternative option in the consultation question below.

Key Consultation Issues

Regulation 18 consultation

What is the issue?	Who raised the issue?	What are we doing to address the issue?
Night time economy: Should avoid a blanket approach to night–time economy uses. In particular OPDC should take a more flexible approach to	Brent Council, Old Oak Park (DP9)	No change proposed. OPDC considers that the policy as currently drafted allows for sufficient flexibility for a developer to justify extended

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opening hours in Park Royal to support businesses that operate 24 hours.		opening hours, subject to certain criteria being met, such as not causing detrimental harm to the amenity of residents and not resulting in harmful cumulative impacts.
Policy OSP4 is incompatible with other policies in the Plan such as TC7.	Old Oak Interim Forum	No change proposed. OSP4 now no longer exists as a policy. Officers do not consider it conflicts with the night time economy policy as this policy does allow for extended hours of operation where impacts on residential amenity are appropriately mitigated.
Do not support alternative policy option for TC7 as it would disrupt planned residents	Grand Union Alliance	No change proposed. OPDC has not taken forward the alternative policy option approach in the Regulation 19 night-time economy policy (TCC11).
Policy TC7 should positively support the evening night time economy, and proposals which add vibrancy and should avoid a blanket approach to limiting night time economy uses	Old Oak Park (DP9), 1 resident	No change proposed. The supporting text recognises the positive impact that the night-time economy has on London's economy and to supporting the vibrancy and vitality of town centres. The policy does not take a blanket approach and allows for extended hours subject to certain policy criteria being met.

Regulation 19(1) consultation

What is the issue?	**Who raised the issue?**	**What are we doing to address the issue?**
Support policy TCC11	Mayor of London, Hammersmith Society, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	Noted.

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Policy TCC11's supporting text should reference the Mayor's 24-hour London vision which sets out his plan to turn London into a leading 24-hour global city and focuses on building a night-time culture	Mayor of London	Change proposed. Reference to this has been inserted in the supporting text.
The policy is not effective and should include more information about the night-time economy.	Friary Park Preservation Group	No change proposed. OPDC considers that the policy provides sufficient deal on the night-time economy to make the policy effective.
Planning applications for new night time economy uses need to be assessed in terms of their impact on existing night time economy uses in Harlesden. Applications that have a detrimental impact should be refused.	Grand Union Alliance, Wells House Road Residents Association, Joanna Betts, Nadia Samara, Nicolas Kasic, Francis, Mark and Caroline Sauzier, Patrick Munroe, Lily Gray, Ralph Scully, Catherine Sookha, Lynette Hollender, Jeremy Aspinall, Thomas Dyton	No change proposed. The Retail and Leisure Needs Study identifies that Harlesden Centre will undergo growth over the next 20 years, both as a result of background growth, and also as a result of expenditure from the OPDC area. Within OPDC's Retail and Leisure Needs Study, estimates for floorspace provision within the OPDC area have been made on the basis of 80% retention of convenience expenditure and 20% retention of comparison expenditure, meaning there will be significant opportunities for Harlesden to capture this growth. Policy TCC1, which would include night-time economy uses, requires Impact Assessments where schemes meet the thresholds outlined within the policy and which fall within retail, leisure and office uses.

Summary of Relevant Evidence Base

OPDC evidence base

Supporting Study	Recommendations
Cultural Principles	• Recommendation 14: That our Local Plan reflects, and provides for, the full range of heritage assets and cultural infrastructure. This will include venues such as theatres and cinemas, as well as informal culture like skate parks, pubs and buildings and spaces that support creative activities, and the day and night time economies such as restaurants and night clubs. • Recommendation 19: That agent of change principles are adopted in the Local Plan.

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Rationale for any non-implemented recommendations

Supporting Study	**Recommendations**	Rationale for not including
N/A	N/A	N/A

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