

# 9

## TOWN CENTRE USES



# Town centre uses

9.1 This chapter contains policies addressing the following policy themes:

- TC1: Strategic Policy for town centre uses
- TC2: Town centre hierarchy
- TC3: Vibrancy
- TC4: Retail and eating and drinking establishment needs
- TC5: Culture, sports and leisure facilities
- TC6: Visitor accommodation
- TC7: Evening night time economy uses

## Questions:

**QTCa:** Are there any other town centre use policy themes that you think OPDC's Local Plan should be addressing?

**QTCb:** Do you agree with the chapter's preferred policy options? If not, what might you change?

**QTCc:** Are there any other policy alternatives that could replace the chapter's preferred policies?

You can provide comments directly through:

[opdc.commonplace.is](https://opdc.commonplace.is)

## EVIDENCE BASE

Table 9: Town centre uses Evidence base

| Supporting study                                  | Description   | Status          |
|---|---|-----------------|
| <b>OPDC Retail and Leisure Needs Study (RLNS)</b> | A study looking at the quantitative need for retail and leisure space in the OPDC area generated by those living, working and visiting the area. The study also includes qualitative recommendations to deliver vital and vibrant town centres. | Draft completed |
| <b>OPDC Cultural Principles</b>                   | A document showing how OPDC can contribute to London's position as the world's cultural capital and how embedding culture in development can assist placemaking.  | Draft completed |

# TC1: Strategic policy for town centre uses

## KEY ISSUES

1. The new population will need to have access to town centre uses and services to serve their needs.
2. The Old Oak and Park Royal area itself is poorly served by town centre uses, but the wider hinterland is well served through a network of town centres, such as Harlesden, Ealing and Shepherd's Bush.
3. Provision will need to complement existing neighbouring centres and their ability to grow in future.
4. Town centre uses can play a critical role in placemaking, adding vibrancy to buildings and the public realm and helping to attract people to live, work and visit the area.
5. Town centre uses can also add to the economic prosperity of an area, helping to provide a range of employment opportunities over a wide range of sectors and skill levels.

## POLICY CONTEXT

### National

9.2 The NPPF promotes the role that town centre uses can play in supporting the needs of those living, working and visiting an area and that town centres should sit as the heart of communities.

### Regional

9.3 The London Plan promotes the importance of providing adequate retail, visitor accommodation and culture, sports and leisure uses to accommodate London's growing needs and the role that these facilities can play in promoting economic prosperity and maintaining London's status as one of the world's greatest cities.

## PREFERRED POLICY OPTION

OPDC will support proposals for town centre uses that:

- a) Provide locally and strategically significant culture, sports and leisure facilities, that act as catalysts for regeneration and help strengthen London's position as the world's cultural capital;
- b) Provide a range of A-class uses that serve the needs of existing and new residents, employees and visitors in terms of their location, scale and phasing;
- c) Create a network of new town centres that are the focus for town centre uses and which complement London's wider network of centres;

- d) Add to the activation and vibrancy of the area and help to create a sense of place;
- e) Promote social and economic regeneration and healthy lifestyles; and
- f) Deliver best practice in terms of implementing innovative technology, design and management of spaces to support long term sustainability.

## JUSTIFICATION

9.4 A key role of OPDC is to coordinate and drive forward the regeneration and transformation of the area. As part of this, there is a need for a range of life choices to be provided for existing and future people living, working and visiting Old Oak and Park Royal. Town centre uses will play a critical role in achieving this, providing new employment and services and adding vibrancy and activity.

9.5 The OPDC Cultural Principles document sets out how OPDC could play a significant role in London's cultural offer by delivering new cultural

destinations. This could include a mix of culture, sports and leisure uses to serve the needs of existing and new residents, the surrounding neighbourhoods and strategically across London and the south-east.

9.6 Small and large-scale culture, sports and leisure uses, which could act as catalysts for regeneration should be supported by visitor accommodation as well as a range of retail uses and eating and drinking establishments to serve the needs of those living, working and visiting the area. Town centre uses will be focused within a series of new designated town and local centres (see policy TC2). To support these centres, employment and residential uses will also be supported as part of the mix of uses, which can help to increase footfall and add to vibrancy and vitality.

9.7 New town centre uses will also play a critical role in overcoming the socio-economic deprivation experienced in and around the OPDC area by providing a range of new opportunities for employment and training across a breadth of sectors.

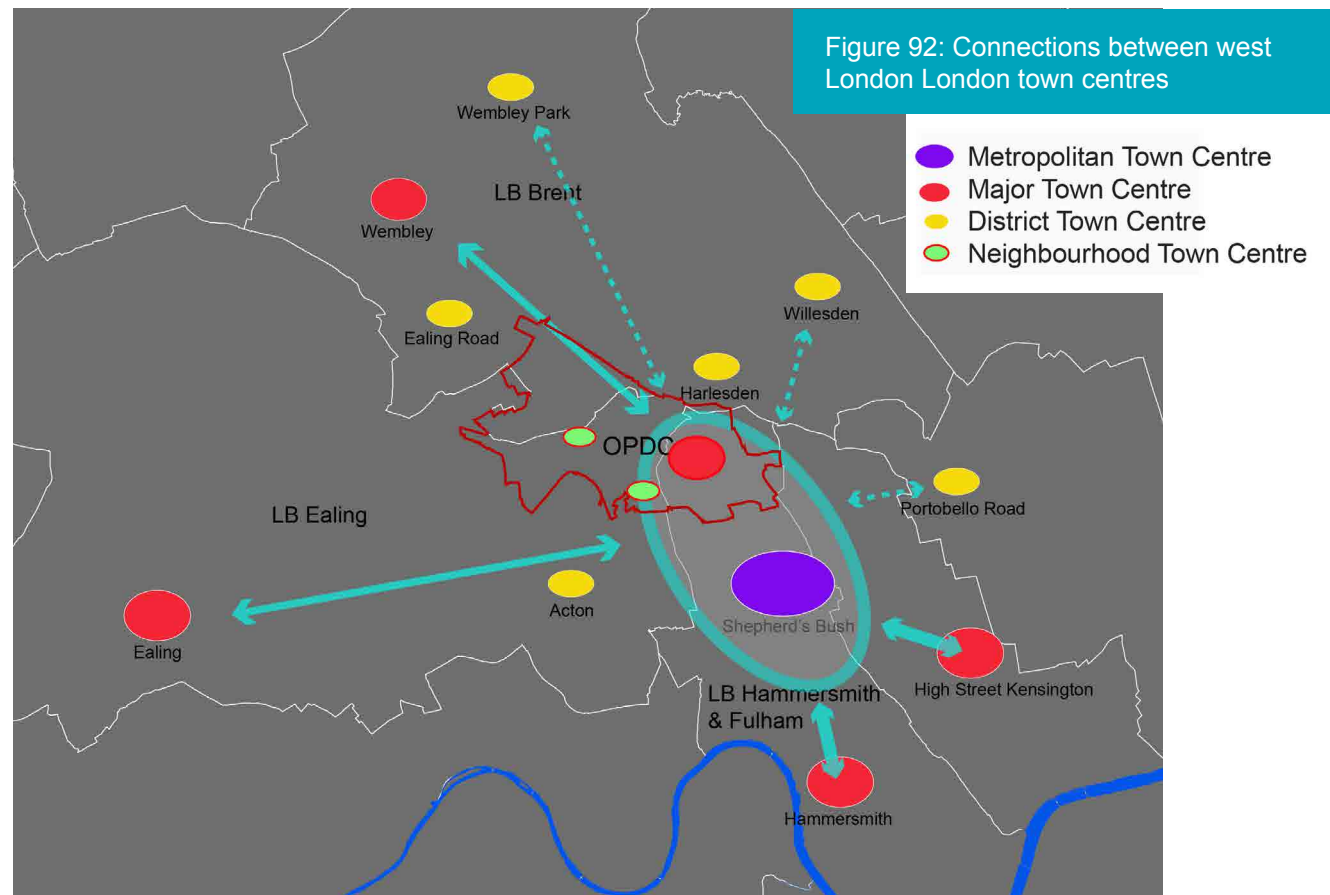
9.8 Through their spatial distribution and function, town centre uses can also promote healthy lifestyles and OPDC's

role as a 'Healthy New Town'.

9.9 The enhancement of existing centres and provision of new town centres provides opportunities to demonstrate how new technology can be successfully integrated to support flexibility and ongoing changes in the retail and leisure sector.

## ALTERNATIVE POLICY OPTION

9.10 There are no alternative options considered appropriate as this would not accord with OPDC's draft Retail and Leisure Needs Study (RLNS) or the London Plan, which requires a mix of uses as part of major development proposals.



# TC2: Town centre hierarchy

## KEY ISSUES

1. The only existing centre in the OPDC area is the neighbourhood centre in the middle of Park Royal, designated in LB Ealing's Core Strategy.
2. To support the needs of new employees, residents and visitors to the area, a new network of town centres needs to be designated.
3. The centres should be of a sufficient size to meet needs, promote sustainability and assist with placemaking.
4. It is recognised that a new centre at Old Oak will impact on west London, but this new centre will need to be planned and sized so as to complement the existing hierarchy.

## POLICY CONTEXT

### National

- 9.11 The NPPF requires local authorities to:
- positively plan for town centres, promoting competitiveness and setting out policies for the management and growth of centres over the plan period;
  - define a network and hierarchy of centres that is resilient to anticipated future economic changes;
  - set policies for the consideration of town centre uses which cannot be accommodated within designated town

centres; and

- apply a sequential approach requiring 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.

### Regional

9.12 The London Plan promotes the designation of new town centres, giving priority to areas with a need for regeneration and better access to services, facilities and employment, which is true for both Old Oak and Park Royal which are identified as Opportunity Areas and parts of which are also identified as areas of regeneration.

## PREFERRED POLICY OPTION

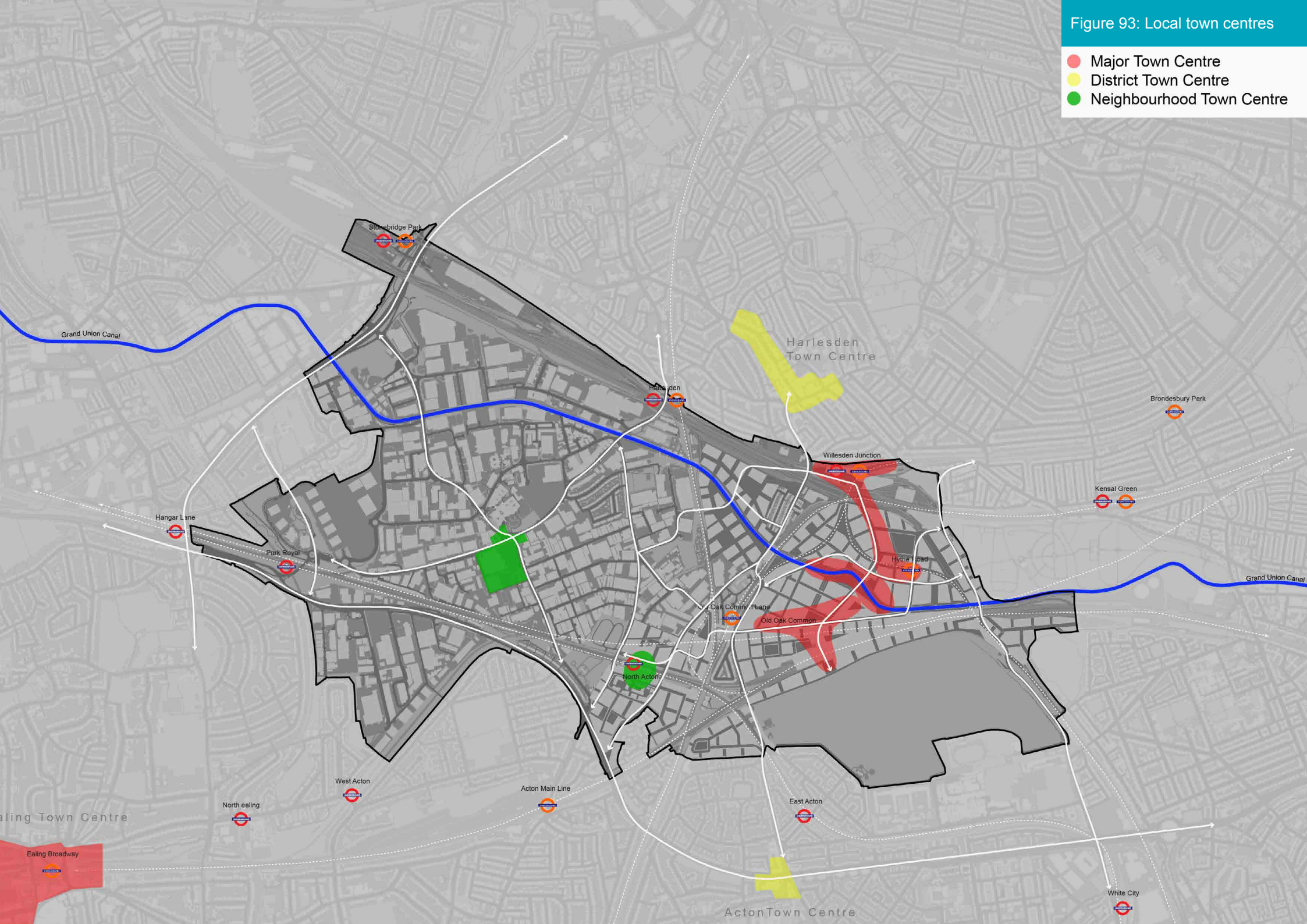
- a) OPDC will support development that delivers the following town centre hierarchy:
- i. Old Oak High Street – a potential new Major Centre within Old Oak (see Policy P3);
  - ii. North Acton - a potential new Neighbourhood Centre close to North Acton Station (see Policy P7); and
  - iii. Park Royal – a Neighbourhood

Centre in the middle of the Park Royal Industrial Estate (see Policy P6).

- b) Existing edge or out of centre town centre uses will be protected where they meet local needs;
- c) Proposals for new town centre uses on the edge of or outside of town centres may be appropriate but only where a sequential approach has been taken to site identification, looking firstly within centres and secondly on the edge of centres and where they;
  - i. Address identified deficiencies in need;
  - ii. Reduce the need to travel by car and do not have an adverse impact on the operation of the road network;
  - iii. Support placemaking;
  - iv. Do not impact on the functioning of Strategic Industrial Locations; and
  - v. Do not have an adverse impact on, and support the role and function of, designated centres.
- d) OPDC will require developers to submit an impact assessment for schemes:
  - i. providing over 5,000sqm of town centre uses in the Old Oak High

Figure 93: Local town centres

- Major Town Centre
- District Town Centre
- Neighbourhood Town Centre



- Street Major Centre; and
- ii. providing over 2,500sqm of town centre uses gross elsewhere (and including both the North Acton and Park Royal centres).

## JUSTIFICATION

9.13 OPDC's draft Retail and Leisure Needs Study (RLNS) identifies that a new Major Centre should be designated in the Old Oak area. This recognises that:

- the significant new population that will be created in the area - 50,000 new residents, 55,000 employees and 250,000 people interchanging (embarking or disembarking) each day within Old Oak Common Station. The draft RLNS identifies that this would generate a quantitative need for 52,500sqm of A-class uses alone within Old Oak High Street during the draft Local Plan period (to 2037).
- the fantastic public transport accessibility that will be afforded to the area, making Old Oak a highly sustainable location for town centre uses, reducing the need for people in the surrounding area to travel to these uses by private vehicle; and
- a new major town centre in Old Oak would have significant benefits to placemaking in the area, providing

opportunities for the provision of a range of culture, sports and leisure facilities which as well as meeting local need, could make a significant contribution to strategic provision and help to promote London as the world's cultural capital, as set out in the Mayor's Cultural Strategy.

9.14 The draft Retail and Leisure Needs Study (RLNS) has tested the impact that the designation of Old Oak High Street as a 'major' centre would have on the surrounding retail hierarchy. This shows that negative impacts are likely to be minimal and that most if not all centres are likely to significantly benefit from the additional expenditure brought to the area by the new residents, employees and visitors. OPDC will be working with the local authorities to explore ways in which existing town centres such as Harlesden, Shepherd's Bush and Ealing can be well positioned to capture the benefits of this new expenditure.

9.15 OPDC will also work closely with the London Borough of Hammersmith and Fulham to consider how this new major new town centre in Old Oak can complement the existing metropolitan town centre designated at Shepherd's Bush, which has undergone rapid expansion in recent years, with the

opening of the Westfield London shopping centre and which is currently being further extended.

9.16 In recent years, development in North Acton has delivered over 2,000 homes and an additional 1,000 student homes with current and future schemes anticipated to deliver an additional 2,000+ homes within the plan period as well as a substantial quantum of new jobs, particularly to the north of North Acton station in the Park Royal Industrial Estate. To support this growing population and to provide a range of town centre uses within easy reach of residents and employees, the preferred policy option proposes that North Acton is designated as a new Neighbourhood Centre. OPDC's draft RLNS suggests that this centre should accommodate approximately an additional 5,000sqm of A-class floorspace.

9.17 The centre of Park Royal was identified as a Neighbourhood Centre in Ealing's Core Strategy (2010). The continuation of this designation recognises the important role that this centre plays in acting as a service centre for employees in the Park Royal Industrial Estate. The intensification and growth of the Park Royal Industrial Estate will provide opportunities for OPDC to review the boundary of this



centre through future iterations of the draft Local Plan.

9.18 Outside of these centres, there are a number of existing town centre uses, including a number of eating and drinking establishments, convenience stores and culture, sports and leisure uses. These uses will continue to be protected where these facilities are providing local facilities to residents and employees and where there are no comparable alternative facilities in the vicinity.

9.19 Retail and other town centre uses should be focused within the designated town centres. However, in accordance with the sequential test, if there are no suitable sites within these designated centres there may be the potential for town centre uses in edge of centre or out of centre locations. This would be supported where it addresses a specific deficiency in need, such as in areas further away from the designated centres or where they provide local convenience retail that reduces the need to travel. Such provision should also demonstrate how it supports placemaking, such as by providing improved legibility or by providing active uses in areas of high footfall. Applicants would also need to demonstrate that the proposal's form and function would

not detract from the designated centres both within the OPDC area and within the wider hinterland.

9.20 The designation of the new town centre hierarchy would negate the need for a sequential test for developments within that centre under paragraph 24 of the NPPF. However, as no centres with the exception of Park Royal are currently established, OPDC's draft RLNS recommends that retail impact assessments are required until such time as the proposed centres are designated, in order to ensure that uses will have a complementary impact on existing and new town centres. In accordance with the draft RLNS, OPDC will require applicants proposing in excess of 5,000sqm gross additional town centre use space in Old Oak High Street and 2,500sqm gross additional town centre use space elsewhere to submit an impact assessment. In accordance with the NPPF, this should consider the impact of the proposal on existing, committed and planned investment in nearby centres within its catchment and the impact of the proposal on the vitality and viability of nearby centres.

## ALTERNATIVE POLICY OPTION

### 1. Identify Old Oak High Street as a Metropolitan Centre.

9.21 This option would provide the opportunity to increase the scale of town centre uses in the Old Oak area. This option would have benefits in terms of making Old Oak an attractive destination and could have benefits for placemaking by attracting higher footfall. However, this option could impact on the vitality and viability of the surrounding town centre hierarchy. It may also dilute investment in other centres and could also impact on a wider catchment and a greater number of town centres in west London. The greater quantum of retail on Old Oak High Street could also make it more difficult to let space.

9.22 Examples of other 'metropolitan' town centres in London are Ealing, Shepherd's Bush and Kingston.

### 2. Two centres are designated in Old Oak - a District Centre to the north of the canal and a Neighbourhood Centre around Old Oak Common Station.

9.23 This option would limit the quantum of town centre uses to look to minimise impacts on nearby town centres such as Harlesden, Ealing and Shepherd's Bush. However, this approach would not provide sufficient floorspace to cater for the needs arising from development. The London Plan explains that typically District Centres contain 10,000-50,000sqm retail, leisure and service floorspace and that Neighbourhood Centres, would by virtue, be at either the lower end of this range or below 10,000sqm. The Retail and Leisure Needs Study identifies a quantitative need for 52,500sqm of A-class floorspace alone in Old Oak during the plan period and consequently, designating a District Centre and Neighbourhood Centre would be likely to only provide sufficient floorspace to provide for retail needs and would not allow for the provision of a significant quantum of culture, sports or leisure uses within these centres. The approach of designating a Neighbourhood Centre around the Old Oak Common Station would also fail to capture the catalytic impact that the

station could have on the immediate area and wider hinterland. The Old Oak Common Station is estimated to have approximately 250,000 passengers a day interchanging (embarking or disembarking). There is a significant opportunity for the land uses around the Old Oak Common Station to attract these passengers who are interchanging into the surrounding hinterland and to help activate the place and capture economic benefits for the area and its hinterland and this opportunity would be limited through the designation of a Neighbourhood Centre here, rather than a Major Centre.

9.24 Examples of other District Centres in the area are Harlesden, Hanwell and Portobello Road and examples of other 'neighbourhood' centres in the area are East Acton, Kensal Rise and Perivale.

**3. Two centres are designated in Old Oak - a District Centre to the south of the canal around Old Oak Common Station and a Neighbourhood Centre to the north of the canal.**

9.25 As with option 2 above, this option would seek to limit the quantum of town centre uses to minimise impacts on nearby town centres. As above, it is unlikely that a district and neighbourhood centre would provide sufficient floorspace to cater for the needs of development and certainly would not provide a policy framework for the establishment of strategic culture, sports and leisure uses in the area.

9.26 The designation of a district centre to the south of the Grand Union Canal would better capture the scale of need for town centre uses arising from the population living, working and visiting the area than in option 2. However, to the north of the canal, the designation of a Neighbourhood Centre would not be capable of providing sufficient town centre uses to meet the areas need. This could be met to a certain degree by the District Centre at Old Oak Common Station and the District Centre at Harlesden, but there would also be a risk that premises in this area would struggle and the limited quantum

of town centre uses may impact on placemaking.

**4. Park Royal is not identified as a Neighbourhood Centre and a different approach is taken to town centre uses in the area.**

9.27 The town centre uses in the centre of Park Royal, in particular the ASDA supermarket, generate significant volumes of traffic which have an impact on the ability of Park Royal to function as an industrial estate. An approach to minimise this impact might be to de-designate the centre and allow for its gradual erosion to other uses such as employment and residential including local 'walk to' services. However, this approach could also result in worse impacts on the highway network if the town centre uses are dispersed requiring employees and residents to travel further for their services. It would also see the loss of well used existing local services over time.

# TC3: Vibrancy

## KEY ISSUES

1. Town centre uses play an important role in placemaking, by attracting people to an area and helping to enliven it.
2. This will be particularly important at Old Oak where comprehensive regeneration will support the creation of a new part of London without a clearly defined character.
3. The policy should look to secure a mix of retailers over a wide range of uses and types, including independent retailers, who can add diversity to a shopping centre and play an important role in supporting the local economy.
4. The policy should also look to control uses that may have a negative impact (through over-concentration of one use type) on placemaking.

## POLICY CONTEXT

### National

9.28 The NPPF requires local planning authorities to:

- 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; and

- retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive;

### Regional

9.29 The London Plan supports proposals that sustain and enhance the viability of a town centre, promote healthy living, support and enhance the competitiveness, quality and diversity of town centre uses and that contribute towards enhancing the public realm.

## PREFERRED POLICY OPTION

To promote the role that town centre uses can play in shaping high quality places in Old Oak and Park Royal and ensure that designated centres are vibrant and viable, OPDC will:

- a) Support the role town centre uses can play in delivering high quality places by encouraging proposals that:
  - i. Provide for outdoor uses such as eating and drinking uses with

outdoor seating, event space and street markets where viable and where they do not detract from residential amenity. Any proposals for street markets would need to be accompanied by a management plan;

- ii. Deliver and maintain high quality accessible shopfronts; and
  - iii. Deliver and maintain high quality overlooked public realm.
- b) Encourage the provision of meanwhile uses in early development phases (see OSP5);
  - c) Support innovation and flexibility so that uses can expand and/or change between use classes subject to demand and appropriate permissions/agreements;
  - d) Require proposals for A-Class uses (retail and food and drinking establishments) to provide a mix of unit sizes, including at least 10% of floorspace for units of 80sqm or less to support independent retailers. Applicants should actively market these units within the local communities;
  - e) Require proposals:

- i. Providing over 2,500sqm of A-class floorspace to submit a Retail Vision Statement; and
  - ii. Providing over 2,500sqm of town centre use floorspace to submit a Cultural Action Plan.
- f) Support the creation of a healthy new part of London by supporting uses that have a positive impact on health and well-being and restricting planning applications for:
- i. betting shops, pay-day loan shops and games arcades; and
  - ii. takeaways (Class A5 uses), particularly where they are in close proximity to primary and secondary schools.



Figure 94: Exhibition Road

## JUSTIFICATION

9.30 Town centre uses within the OPDC area, particularly in Old Oak, will help to play a critical role in the approach to placemaking. An important way of achieving this is through activating and overlooking the public realm, by providing outdoor uses such as event space, outdoor seating associated with eating and drinking establishments and through the provision of street markets. Any proposals for street markets would need to be accompanied by a management plan that identifies its hours of operation and storage arrangements when not in use, types of traders, servicing and transport impacts.

9.31 The quality of buildings fronting onto the public realm will be of equal importance to ensuring that town centres create vibrancy and activity. Proposals must ensure that shopfronts and other active frontages are accessible and are designed to the highest quality, considering how proportions, materials and detailing relates to and complement their surroundings, exploring opportunities for variety, innovative design and local distinctiveness.

9.32 In Old Oak in particular, it will be important to create a place as early as

possible in the development phases. Meanwhile or temporary town centre uses could play an important role in achieving this and Policy OSP5 encourages major development proposals to submit a meanwhile strategy demonstrating how their proposals will actively promote and deliver meanwhile uses in early development phases.

9.33 Given the scale of development envisaged within the OPDC area and the timescales over which this development is programmed for delivery, it will be important for proposals to be designed to be sufficiently flexible to allow for changing market conditions and accommodate emerging retail typologies. OPDC will encourage proposals that allow for flexibility in their size, for example by providing for expansion through the future creation of mezzanines or the subdivision/amalgamation of units. OPDC will also support proposals that, through their design, consider the ability for units to readily change use class.

9.34 Within town centres, it is important to have a variety of retailers in order to create vibrancy and ensure the long term vitality of the centre. To support this, OPDC will expect retail proposals to provide for a range of unit sizes for

A-class floorspace and secure at least 10% floorspace for units of 80sqm or less (defined in the London Small Shops Study 2010), which will also help support the establishment of SMEs and independent retailers in the OPDC area, who tend to operate in smaller units.

9.35 For major applications providing over 2,500sqm of A-class uses (which is the threshold for OPDC's requirement for a Retail Impact Assessment in Policy TC2), OPDC will require applicants to submit a Retail Vision Statement. This should set out in more detail what the applicant's expectations are in terms of the type of retailers and eating and drinking establishments. The Vision Statement should also identify what the long term management arrangements are for the proposed units and what opportunities this might provide for the longer term management of the centre, in a similar way to how the Howard de Waldon Estate has managed Marylebone High Street.

9.36 OPDC's Cultural Principles document identifies that OPDC can help play an important role in continuing London's position as the globe's cultural capital. To support this, proposals providing in excess of 2,500sqm of town centre use floorspace will need to

submit a Cultural Action Plan that sets out how their scheme will contribute to the cultural offer in Old Oak and Park Royal as support OPDC's realisation of its cultural vision.

9.37 The "Health on the High Street" report published by The Royal Society for Health in 2015 provides a range of sources of evidence about the negative health impact of betting shops, payday loan shops and fast food takeaways and the positive health impacts of health services, pharmacists, leisure centres/ health clubs, libraries, museums and art centres and pubs and bars. There has been a growing concern in recent years about the proliferation and over-concentration of betting shops, pay-day loan shops and amusement arcades and their impacts on mental health and the vibrancy and vitality of town centres. In 2015 Government re-classified betting shops and pay-day loan shops within a separate use class (amusement arcades are already within a separate use class). There has also been a growing concern about the growth in fast food takeaways (Class A5 uses) and their impact on health, in particular, regarding the proximity of takeaways to schools and the impact that this has on childhood obesity. Evidence shows that the type of food on sale nearest to schools influences the diet of schoolchildren and that the

availability of "unhealthy" foodstuffs makes healthier choices less likely. As a 'Healthy New Town', OPDC will restrict proposals for new takeaways in close proximity of school entrances and will promote the loss of existing takeaways within these areas. In addition, OPDC will resist proposals that would result in the clustering of A5 uses to the detriment of the character and function or vitality and viability of a centre. As a 'Healthy New Town' OPDC, in consultation with NHS England, will work closely with stakeholders to promote and support uses that have a positive impact on health and well-being. It will also resist proposals for new, and encourage the loss of existing, facilities that have a detrimental impact on health and well-being.

## 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.

#### Questions:

**QTC3a:** What restrictions should be identified for betting shops, pay-day loan shops games arcades and takeaways?

You can provide comments directly through:

[opdc.commonplace.is](https://opdc.commonplace.is)

# TC4: A-Class needs

## KEY ISSUES

1. It is important that an appropriate quantum of A-class uses are provided to support the needs of those living, working and visiting Old Oak and Park Royal.
2. If there is not enough A-class floorspace, people will be required to travel further for their needs, putting increased pressures on the transport network and undermining the placemaking benefits that A-class floorspace could bring to the OPDC area.
3. Conversely, if too much A-class floorspace is provided, units could remain vacant or the uses could start to draw significant levels of trade away from the surrounding retail hierarchy and have a detrimental impact on their vitality and viability.
4. It will be important to achieve the right balance and consider how OPDC can be flexible and respond to future changing market conditions and local need.

## POLICY CONTEXT

### National

9.39 The NPPF sets out an expectation that local planning authorities assess the quantitative need for town centre uses including A-class uses and that sites should be identified to meet this need.

### Regional

9.40 The London Plan requires local planning authorities to identify future levels of retail and other commercial floorspace need.

## PREFERRED POLICY OPTION

- a) A-class uses (retail and eating and drinking establishments) should serve the needs of the development and complement nearby centres. This will be achieved by requiring developers to:
- i. Accord with the quantitative need identified below:

|                   | Local Plan period (2037)   |
|-------------------|----------------------------|
| A1                | 27,950 - 33,450 sqm        |
| A1 service and A2 | 15,100 - 18,500 sqm        |
| A3-A5             | 10,650 - 12,150 sqm        |
| <b>Total</b>      | <b>53,700 - 64,100 sqm</b> |

- ii. Submit a masterplan showing how their proposals fits within a wider comprehensive approach and how their retail provision interacts

with provision in neighbouring schemes;

- iii. Demonstrate through robust justification and evidence that the proposals would not adversely affect the vitality and viability of nearby centres where proposals would exceed the quantitative need; and
  - iv. Submit a 'Town Centre Enhancement Strategy' where proposals are likely to have an impact on nearby centres;
- b) In the Local Plan period, A-class uses should be broadly distributed across the town centre hierarchy as follows:
- i. Approximately 52,500sqm in Old Oak High Street Town Centre;
  - ii. Approximately 5,000sqm in North Acton Neighbourhood Centre; and
  - iii. Approximately 5,000sqm in Park Royal Neighbourhood Centre.

## JUSTIFICATION

9.41 The new population that will be living, working, visiting and travelling through the OPDC area will need to be served by an appropriate quantum of retail. There retail quantum will be vital



in making a new place and creating activity and vibrancy. However, the area surrounding OPDC is currently well served by retail and it is important that the vitality and viability of these centres are not undermined by this new retail provision. This is particularly the case with Harlesden Town Centre in the London Borough of Brent, which is the closest town centre to OPDC and which is the most susceptible to impacts as a result of proposals for retail in OPDC.

9.42 The Old Oak and Park Royal Retail and Leisure Needs Study (RLNS) has tested the appropriate overall quantum and phasing of retail in OPDC. The study assumes that approximately 75% of convenience expenditure and 15-25% of comparison expenditure from the population will be retained in the area (with 25% and 75-85% respectively being spent in the surrounding hinterland). The RLNS recommends that OPDC adopt a 25% retention figure for comparison expenditure in recognition of the potential designation of a new major town centre at Old Oak High Street. The study confirms that this quantum of retail would:

- Deliver the necessary placemaking benefits for the OPDC area;
- Provide an appropriate quantum of retail to provide for the needs of the development, including those

living, working, visiting and travelling through OPDC; and

- Not have a significant detrimental impact and may have a beneficial impact on neighbouring town centres.

9.43 For larger retail proposals, OPDC will require applicants to submit a Town Centre Enhancement Strategy that would need to recommend how nearby town centres might be impacted by a proposal and also set out how interventions in town centres could maximise benefits and avoid risks. The RLNS identifies that this will be of particular relevance to Harlesden, which the study identifies at the town centre with the most to lose or gain as a result of retail provision in OPDC.

9.44 The RLNS sets out the broad spatial distribution of retail and other A-class uses, which identifies that the majority of this floorspace should be provided within the Old Oak High Street Major Centre. This recognises the substantial uplift in new homes and jobs is likely to occur in the Old Oak area. However, the study also identifies potential growth in both North Acton and Park Royal, which will both see increases in new homes and jobs across the plan period.

## ALTERNATIVE POLICY OPTION

**1. Identify OPDC as a more 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.

# TC5: Culture, sports and leisure facilities

## KEY ISSUES

1. Culture, sports and leisure facilities make an important contribution to placemaking, could be important catalyst uses and could help to define and shape the place and add to vibrancy and activity by attracting visitors to an area.
2. The Mayor's Cultural Strategy promotes London as the global centre for culture and as London's largest and well connected regeneration area.
3. The OPDC area and particularly Old Oak can play a leading role in maintaining London's pre-eminence for culture, sports and leisure.

## POLICY CONTEXT

### National

9.46 The NPPF sets out an expectation that local planning authorities assess the quantitative need for town centre uses including culture, sport and leisure uses and that sites should be identified to meet this need.

### Regional

9.47 The London Plan requires local planning authorities to assess the quantitative need for town centre uses, including culture, sports and leisure. The plan and the Mayor's Sports Legacy Plan aim to increase partici-

pation in, and tackle inequality of access to, sport and physical activity in London, particularly amongst groups/areas with low levels of participation.

## PREFERRED POLICY OPTION

Proposals for culture, sports and leisure facilities will be required to:

- a) Support the creation of a cultural, sporting and leisure destination at Old Oak, serving both a local and a London-wide catchment;
- b) Help support placemaking and/or act as a catalyst for regeneration;
- c) Not give rise to unacceptable impacts on amenity and transport; and
- d) Provide affordable access for local communities.

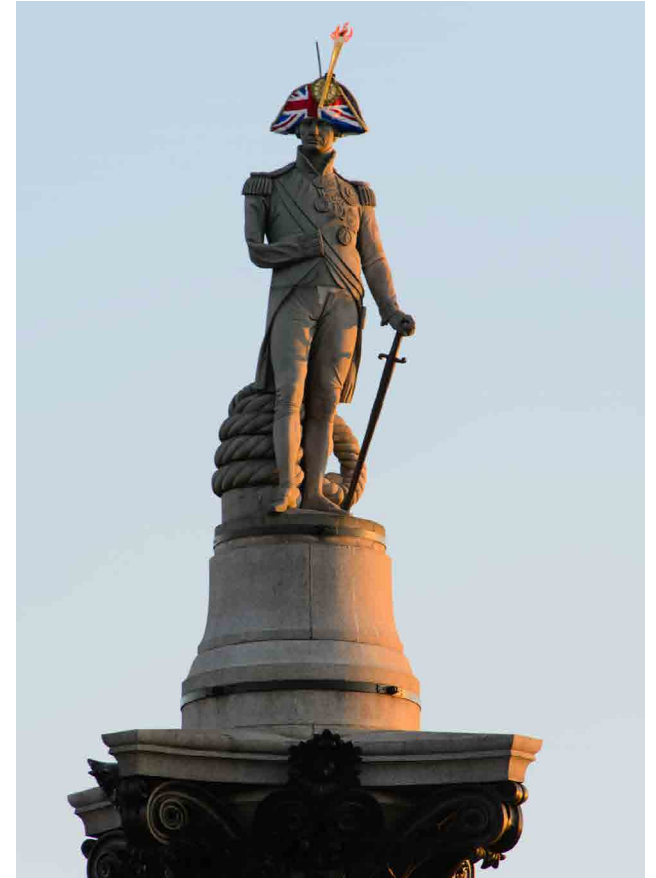
## JUSTIFICATION

9.48 The Mayor's Cultural Strategy promotes London as the world's cultural capital and how this role can help widen the reach of and access to culture, support education skills and careers and enhance the physical

environment. As London's largest regeneration project, OPDC can play a central role in delivering new cultural facilities to help consolidate London's position as a global leader for culture. OPDC has produced a Cultural Principles document which outlines how this could be supported. OPDC will be supportive of the provision of new facilities, where they demonstrably address either a local or strategic need and do not give rise to an unacceptable impact on the amenity of existing and future residents, businesses or on the transport network.

9.49 Culture, sports and leisure uses can play an integral role in the place-shaping strategy for Old Oak and Park Royal, particularly as part of the early development phases. The scale of the Old Oak area in particular, provides opportunities for a range of large and small-scale culture, sports and leisure uses that could become a focus or a catalyst for regeneration in a similar way to the Central St Martins – University of Arts at Kings Cross (see Policy OSP 5, Chapter 3). OPDC will work with landowners and providers to

Figure 95: Cultural uses & events



achieve this.

9.50 Culture, sports and leisure facilities will be expected to cater for a range of incomes, particularly those in low incomes who are often excluded from access to such facilities or whose choice is often limited. This will be especially important for access to sports facilities. There is a direct correlation between income deprivation and obesity; as a healthy new part of London, OPDC is keen to ensure that there is access for all to new sports facilities for local communities. OPDC will seek to secure a proportion of affordable sports and leisure provision as part of any planning agreement, in the form of discounted membership fees and discounted non-membership access fees.

## 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.

### Questions:

**QTC5a:** What culture, sports and leisure uses do you think OPDC should look to attract to the OPDC area?

**QTC5b:** Where should such uses be located and why?

You can provide comments directly through:

[opdc.commonplace.is](https://opdc.commonplace.is)



Figure 96: Cultural uses & events

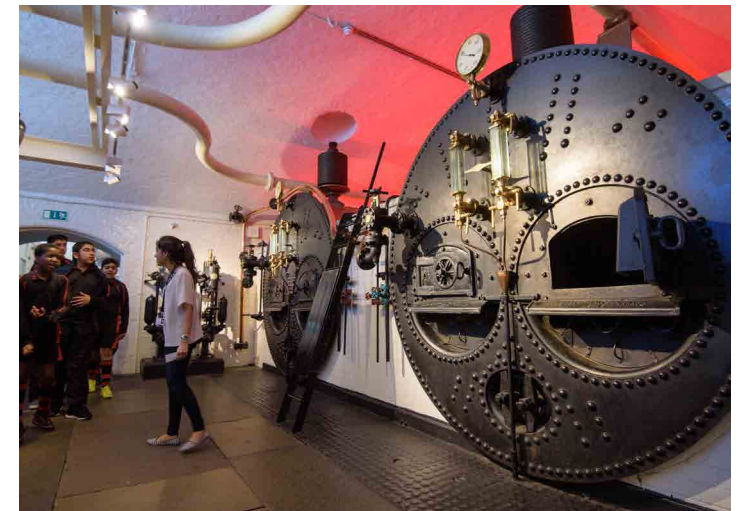


Figure 97: Grand Union Canal



# TC6: Visitor accommodation

## KEY ISSUES

1. London has a growing need for visitor accommodation and particularly business hotels and convention centres.
2. Hotels are well suited to areas of high public transport access and therefore, parts of the OPDC area and particularly the Old Oak area would be appropriate locations to consider promoting visitor accommodation.
3. There is and will be a growing demand for hotel spaces for people visiting Park Royal businesses.

## POLICY CONTEXT

### National

9.52 The NPPF states that local planning authorities should ensure that the needs for main town centre uses such as hotels are met in full and are not compromised by limited site availability.

### Regional

9.53 The London Plan promotes the provision of additional visitor infrastructure and promotes a London-wide target to deliver an additional 40,000 hotel bedrooms by 2036 and that in particular, new business hotel space and convention centres should be provided.

## PREFERRED POLICY OPTION

OPDC will contribute to London's visitor infrastructure and London's overall need for an additional 40,000 high quality hotel bedspaces by 2036 by:

- a) Supporting proposals for visitor accommodation within OPDC's designated town centres and/or within area of high public transport accessibility;
- b) Requiring proposals to provide at least 10% of hotel bedrooms as wheelchair accessible and submit Accessibility Management Plans;
- c) Providing a range of types of visitor accommodation over a range of affordabilities;
- d) Promoting the provision of business hotels and multi-functional convention facilities; and
- e) Promoting high quality design and protecting the amenity of nearby residents

## JUSTIFICATION

9.54 The London Plan establishes a London-wide need for an additional 40,000 hotel bedrooms by 2036. Due to

its high public transport accessibility and proximity to destinations such as the West End, Heathrow and first point of call for trains coming from the north, the OPDC area is likely to be an attractive location to meet this need. Visitor accommodation within the OPDC area should be focused within designated centres and in areas of high public transport access to minimise impact on residential amenity and to minimise the need for car parking and hence reduce the impact on the transport network.

9.55 Applicants will be required to provide at least 10% accessible hotel bedspaces and will be required to submit an Accessibility Management Plan committing to providing an enhanced level of customer care to disabled guests and, at the same time, optimise the use of the accessible rooms.

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

particular need in London for high quality business visitor accommodation and the Old Oak area will be particularly well suited to providing for this need with good connections to Heathrow, Gatwick, Central London and the north of England.

9.57 Business accommodation should include provision for conference facilities and in large hotels, convention centre facilities, for which there is currently an under-supply in west London. Providing high quality facilities is essential as the quality of hotel accommodation often shapes visitors perceptions of the capital and encourages recommendations and/or repeat visits. OPDC will encourage developers to join national quality assurances such as VisitEngland's National Quality Assessment Scheme. OPDC will also require developers to demonstrate that proposals do not have a detrimental impact on the amenity of neighbours, particularly residents and will require developers to submit management schemes demonstrating how potential impacts will be minimised and mitigated against.

9.58 It should be noted that this preferred policy option does not provide guidance for emerging sharing economy models for delivering 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.

# TC7: Evening night time economy

## KEY ISSUES

1. Night-time economy uses play an important role in adding to vibrancy of an area. However, if not carefully designed and located they can result in disturbance to residents, in particular in high density areas.
2. A policy is necessary to set in place controls on the hours of operation of such uses so that there is a limit to the hours of operation without express permission for later opening hours.

## POLICY CONTEXT

### National

9.60 The NPPF requires local authorities to recognise town centres as the heart of their communities and pursue policies to support their viability and vitality.

### Regional

9.61 The London Plan requires local planning authorities in their Local Plans to minimise the impact of night time economy uses on other land uses. The approach should take into account the cumulative effects of night time uses and saturation levels beyond which would result in unacceptable impacts on the environmental standards befitting a world city and quality of life for local residents.

## PREFERRED POLICY OPTION

- a) Planning permissions for eating and drinking establishments and culture, sports and entertainment uses, either as the main or as the ancillary use, will be the subject of conditions controlling hours of operation to minimise their impact on residential amenity;
- b) There will be a presumption that:
  - i. Within designated centres premises should close by 00:00; and
  - ii. Outside of designated centres premises should close by 23:00.
- c) Proposals for extended opening hours beyond the limits outlined under b) would need to demonstrate that:
  - i. there would be no detrimental harm to the amenity of neighbours resulting from the facility itself or from those travelling to and from the facility; and
  - ii. the proposal would not result in harmful cumulative impacts in association with other late licensed properties.

## JUSTIFICATION

9.62 OPDC supports the role that eating and drinking establishments and culture, sports and leisure uses can play in contributing to the vibrancy and vitality of the OPDC area alongside adding activity to the public realm and supporting the local economy. However, it is important in the late evening and during the night that the impact of these uses on the amenity of neighbours, particularly residents, is controlled. OPDC will condition planning permissions to minimise this impact. Proposals for late licenses will be assessed in terms of the uses impact on residential amenity and will consider issues such as noise within the premises, smells, light pollution and the impact of those going to and from the facility, considering issues such as traffic and car parking and anti-social behaviour.

9.63 Residential uses surrounding town centre locations where there is potential for late night activities should carefully consider the locations of habitable rooms and in particular bedrooms. They should also clearly demonstrate how



noise attenuation measures have been included and designed to the highest standards. This approach is necessary to ensure both a vibrant night-time economy and high quality residential environment.

## 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.

### Questions:

**QTC7a:** What locations might be suitable for more flexible hours of operation for night-time economy uses if OPDC were to adopt the proposed alternative policy?

You can provide comments directly through:

[opdc.commonplace.is](https://opdc.commonplace.is)

