

Hot food take-away shops: An evidence base study

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1. Introduction

Background

- 1.1 This evidence base study explains the background and the Council's guidance on addressing the health impacts of hot food take-away shops (A5 use class) and forms part of the Council's wider strategic approach on addressing health concerns, particularly obesity, in the borough.
- 1.2 In recent years the number and location of hot food take-away shops in the borough has caused concern locally with individuals and organisations. The wider issues of the health challenges around obesity and the benefits of healthy eating have attracted attention nationally and have highlighted the role that local authorities have in seeking positive solutions.
- 1.3 The Council adopted its Core Strategy, the principle planning document, in June 2011 and is now preparing the Development Management Local Plan (DMLP) to set out more detailed planning policies. All planning policy documents need to justify their policies with adequate evidence. This paper draws together information about the relationship between health concerns and hot food take-away shops in the United Kingdom and in Lewisham and provides the evidence base for any new policies put forward in the DMLP to manage their number and location.
- 1.4 The existing planning policy on hot food take-away uses is a saved Unitary Development Plan policy which, together in one policy, deals with Restaurants & Cafes (A3 use class), Drinking establishments (A4 use class) and Hot food take-away (A5 use class). The existing policy focuses on managing environmental impacts such as noise, traffic, odour and refuse and protecting the amenity of nearby residents. The policy does not consider the health impacts associated with hot food take-away uses.

Purpose of the paper

- 1.5 The purpose of this paper is to:
 - Review the existing national, regional and local policy framework in relation to hot food take-away shops and identify if any further local policy guidance is required.
 - Assess both the planning and health related issues around hot food take-away shops in Lewisham.
 - Make recommendations on the future local management of hot food take-away shops in the borough.
- 1.6 The results of this paper will be used to provide evidence to inform and support the direction of policies for the DMLP.

Structure of the paper

- 1.7 Following this introductory section, the paper is structured as follows:

- Section 2 sets out the relevant national, regional and local guidance, as well as providing a comparison of the policy approach of other London boroughs.
- Section 3 sets out the planning issues in relation to hot food take-away shops in Lewisham
- Section 4 sets out the health issues in relation to hot food take-away shops in Lewisham.
- Section 5 discusses the policy options available in addressing the issues.
- Section 6 sets out the conclusions of this report and recommendations for policy formulation in the DMLP.

2. Planning policy context

- 2.1 This section provides the policy context for the relevant national, regional and local planning policies and strategies relating to hot food take-away shops in Lewisham. It looks at the Council's existing approach to hot food take-away shops and provides examples of take-away policies from a range of other London boroughs.

National policy context

- 2.2 The National Planning Policy Framework (NPPF) sets out the government planning policies for England and how they are expected to be applied. It was published on 27 March 2012 and came into effect immediately.
- 2.3 The presumption in favour of sustainable development set out in the NPPF highlights the importance of achieving social, economic and environmental objectives, all three of which involve health issues and influence health outcomes. Thirteen sections within the NPPF support the delivery of sustainable development and section 8, entitled Promoting healthy communities, focuses specifically on the important role that the planning system can play in facilitating social interaction and creating healthy, inclusive communities (paragraph 69). Local Planning Authorities should create a shared vision with communities of the residential environment they wish to see. Local policies should promote opportunities for meeting through mixed use development, strong neighbourhood centres and active street frontages; safe and accessible environments and developments. A range of social, recreational and cultural facilities and services should be delivered including school places and access to quality open spaces.

Regional policy context

- 2.4 The London Plan (2011) sets out the spatial strategy for London to 2031. It forms part of the development plan in Lewisham and its policies can both justify Council planning policies and can be used as reasons for determining planning decisions.
- 2.5 The London Plan sets out two key policies which relate directly to health concerns: Policy 3.2 Improving Health and Addressing Health Inequalities and Policy 3.17 Health and Social Care Facilities. Policy 3.2 is the most relevant in relation to take-away uses and directs boroughs to promote the health and well-being of communities and identify and address significant health issues. This can be achieved, for example, by increasing access to healthy foods and developing local policies to address concerns over the development of fast food outlets close to schools.
- 2.6 In addition to the London Plan, the Mayor of London leads the London Health Improvement Board which has identified four priority areas, one of which is tackling childhood obesity. This focuses on changing the environment across London so that it is easier to make healthy choices and to be a healthy weight.

- 2.7 The London Plan will help to implement the Mayor of London's Health Inequalities Strategy (2010), particularly Objective 5: Healthy Places, which states that *"access to affordable fresh food varies across London and tends to be lower in areas of high deprivation where there is a proliferation of fast food shops and restaurants."*

Local policy context

- 2.8 The Core Strategy is the Council's principal planning document and forms part of the borough's Local Plan, as defined in the NPPF. The saved Unitary Development Plan 2004 (UDP) policies also form part of the Local Plan and these policies, together with the Core Strategy policies are used to assess and determine planning applications in Lewisham.
- 2.9 Core Strategy provides a strategic overview in relation to community wellbeing and seeks to strengthen the quality of life and well-being for residents by, in particular, addressing deprivation and health inequalities (strategic objective 11). The Core Strategy also promotes and supports local food growing and urban agriculture which is one way to increase access to healthy food (Policy 12). As a strategic document, the Core Strategy does not contain detailed policies on restricting access to unhealthy foods or managing the number or location of take away uses.
- 2.10 Saved UPD policy provides further detailed guidance on specific uses and effects. STC 9 Restaurants, A3 Uses and Take Away Hot Food Shops aims to manage and minimise unwelcome environmental impacts such as noise, traffic, odour and refuse and protecting the amenity of nearby residents. The policy does not consider the health impacts associated with hot food take-away uses.

Comparison with other London boroughs

- 2.11 Many London boroughs seek to manage hot food take away uses through the planning system. For the purposes of this study, a review of London borough's policies was carried out. A summary of the various policy positions is in Appendix 2. Most borough policies reviewed have included restrictive policies around A5 take away uses in their development management policies. One borough (Barking and Dagenham) have also produced an SPD to support and provide further detail to the policy.
- 2.12 The policy approaches across the boroughs reviewed generally focus on different combinations of three approaches:

1. Considering applications in specific areas

This generally applies to areas inside/outside of the town centres or shopping parades and applies criteria accordingly. Waltham Forest for example allow 5% take away uses within the designated shopping frontages, while for non-designated areas criteria on the clustering of uses and the proximity to schools is applied.

2. The concentration and clustering of uses

Managing the concentration and clustering of take away uses is a common approach that seeks to maintain a good mix of different uses in an area, commonly favouring A1 shopping uses in designated retail areas.

3. The proximity to schools, and in some instances, other sensitive uses.

A criteria relating to take away uses in close proximity to schools is included in different ways in all the examples looked at. Most commonly the proximity is set at 400 metres however there are variations in whether this applies to both primary and secondary schools and if it is measured from the school boundary. Islington have a closer threshold of 200 metres. In addition to schools, Tower Hamlets, Waltham Forest and Islington also include other sensitive uses such as community facilities, youth centres and parks.

Conclusions

- 2.13 National (NPPF) and regional (London Plan) planning policies both direct local authorities to promote the health and wellbeing of their communities through local policies and approaches. Regional planning policies in the London Plan specifically direct local policies to address concerns over the development of fast food outlets close to schools.
- 2.14 Lewisham's existing policies, in the Core Strategy and the saved UPD policies, seek to improve community wellbeing and to manage environmental impacts arising from restaurants, cafes and take-away shops such as noise, traffic, odour and refuse. UDP policy STC 9 also seeks to protect the amenity of nearby residents however the existing local policy context does not consider the health impacts associated with hot food take-away uses.
- 2.15 Given the national and regional emphasis on supporting the health and wellbeing of residents, and the regional direction for local planning authorities to develop policies addressing concerns over the proximity of fast food outlets to schools, it is considered appropriate for Lewisham to investigate a locally specific policy to address the issue of the number and location of take-away shops in the borough.
- 2.16 A number of other London boroughs have adopted or proposed planning policies that address and seek to restrict hot food take-away uses. There are similar themes to how these boroughs have approached the issue which Lewisham could learn from and modify to suit the local situation.

3. National health concerns

Foresight report, 2007

- 3.1 The Foresight report *Tackling Obesities: Future Choices* (2007) states that diet is one of the key determinants of obesity levels and that consumption of hot food from take-away shops are a source of cheap, energy-dense and nutrient-poor food. This means they tend to be high in fat and sugar but low in vitamins and nutrients and, when consumed in large amounts, can result in an imbalance between calories consumed and calories expended, resulting in weight gain. Increasing access to healthy foods while also limiting access to unhealthy foods are ways that local authorities can influence environmental factors that affect health and wellbeing, including weight gain and obesity.
- 3.2 The Foresight report also highlighted the link between higher obesity levels in deprived areas than in wealthy areas. The report looks at the environmental influences on diet, which may involve access to food for home consumption from supermarkets, and access to takeaways and restaurants.

Healthy Weight, Healthy Lives, 2008 and 2009

- 3.3 The previous Government published *Healthy Weight, Healthy Lives: a Cross-Government Strategy for England* (2008) highlighted that in Britain almost two-thirds of adults and a third of children are either overweight or obese. This is an issue because being overweight or obese can have a huge impact on an individual's health and there is a strong link between excess body weight and diseases such as type 2 diabetes, cancer and heart and liver disease¹. This report found that obese children are more likely than children of a healthy weight to become an obese adult with associated health problems later in life.
- 3.4 In response to these issues, the report called for "*local authorities [to] use existing planning powers to control more carefully the number and location of fast food outlets in their local areas*"². It further stated that "*the Government will promote these powers to local authorities and PCTs to highlight the impact that they can have on promoting healthy weight, for instance through managing the proliferation of fast food outlets, particularly in proximity to parks and schools*".
- 3.5 A follow-up report was published in 2009, *Healthy Weight, Healthy Lives: One Year On*, the focus is on children's health and it is again stated that local authorities should develop planning policies that reflect the needs of their area, which may include tackling obesity, and encourages "*all local authorities to review whether it is*

¹ Department of Health (2008) *Healthy Weight, Healthy Lives: a Cross-Government Strategy for England*. Department of Health, London, page xi.

² Department of Health (2008) *Healthy Weight, Healthy Lives: a Cross-Government Strategy for England*. Department of Health, London, page 18.

*appropriate for fast food restaurants to be located near to schools”.*³

Marmot review, 2010

3.6 The Marmot Review *Fair societies, healthy lives* (2010) looks at the evidence around health inequalities in England and makes recommendations on the development of a health inequalities strategy in England. The review made two recommendations that relate directly to the role of local planning authorities in public health, one of which specifically relates to improving the food environment in local areas. The recommendations are set out below.

- *E2.1. Prioritise policies and interventions that reduce both health inequalities and mitigate climate change . . . by . . . improving the food environment in local areas across the social gradient*
- *E2.2. Integrate planning, transport, housing, environmental and health policies to address the social determinants of health*

Healthy lives, healthy people, 2010

3.7 The Department of Health White Paper *Healthy Lives, Healthy People: Our Strategy for Public Health in England* (2010) states that England is the most obese nation in Europe and that obesity is one of the most widespread threats to health and wellbeing in the country. The White Paper responds to the Marmot review and further highlights the importance of local authorities using planning powers in shaping the built environment and states that *“health considerations are an important part of planning policy.”*⁴ It specifically acknowledges that the planning system can be used to limit the growth of take-away shops and encourages local government to decide on what action is needed locally.

3.8 The White Paper also recognises that DCLG took health concerns forward in the draft National Planning Policy Framework.

Healthy lives, healthy people, 2011

3.9 Building on the 2010 publication of *Healthy lives, healthy people*, this report, *Healthy Lives, Healthy People: A call to action on obesity in England* (2011), recognises that local areas are best placed to create tailored strategies to meet the needs of local communities. It outlines areas where local government can influence health and wellbeing, one area being *“making the most of the potential for the planning system to create a healthier built environment.”*⁵

Conclusions

3.10 The existing national studies and Government reports highlight that the planning

³ Department of Health (2009) *Healthy Weight, Healthy Lives: One Year On*. Department of Health, London, page 33.

⁴ Department of Health (2010) *Healthy Lives, Healthy People: Our Strategy for Public Health in England*. Department of Health, London, page 56.

⁵ Department of Health (2011) *Healthy Lives, Healthy People: A call to action on obesity in England*. Department of Health, London, page 28.

system, and planning policies, have an important role to play in improving health and wellbeing in England. The research also shows that obesity is one of the major health concerns to prioritise as there is a link between obesity and diseases such as type 2 diabetes, cancer and heart disease. There is a particular focus on children's health and reducing childhood obesity as obese children are more likely to become obese adults with associated health problems.

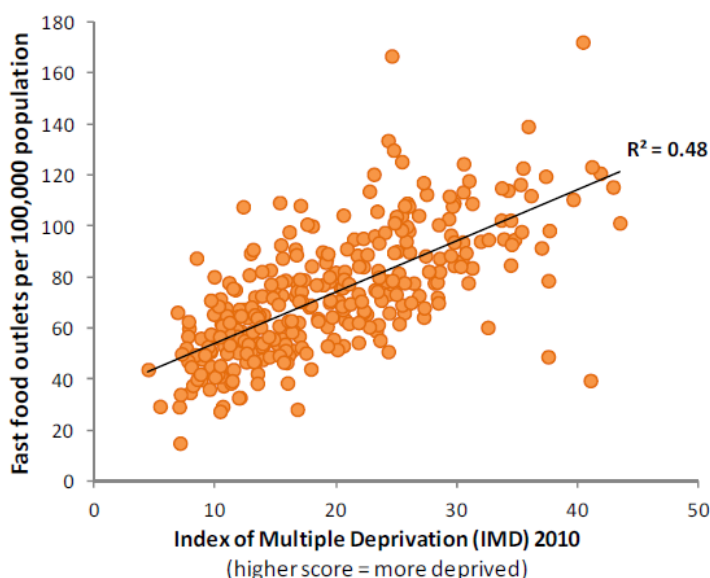
- 3.11 The Foresight review shows the connection between the consumption of take away food and obesity and Government reports state that the planning system can and should play a role in reducing the number and managing the location of take away shops, particularly in relation to schools.

4. Local health concerns

The issues

- 4.1 The Council's retail surveys (2011 and 2012) show that there are 282 hot food take-away shops across the borough and the National Obesity Observatory research shows that Lewisham has the thirteenth highest density of hot food take-away shops per head of population in England⁶.
- 4.2 This over-concentration of take-away uses in the borough, combined with Lewisham's comparatively high levels of deprivation is cause for serious concern.
- 4.3 The Foresight report found that obesity levels tend to be higher in deprived areas than in wealthy areas and recent work by the National Obesity Observatory (NOO) (2012) has found that there is a strong association between deprivation and the density of fast food outlets, with more deprived areas having more fast food outlets per population (see graph below)⁷. A recent UK review of 33 studies looking at the location of take-away shops points out "*[m]ost of the studies have found a positive association between availability . . . of fast-food outlets and increasing deprivation . . . This is an important issue to highlight to policy decision makers as land use restrictions on new fast-food outlets may help to stop the 'deprivation amplification' effect*".⁸

Relationship between density of fast food outlets and deprivation
by local authority

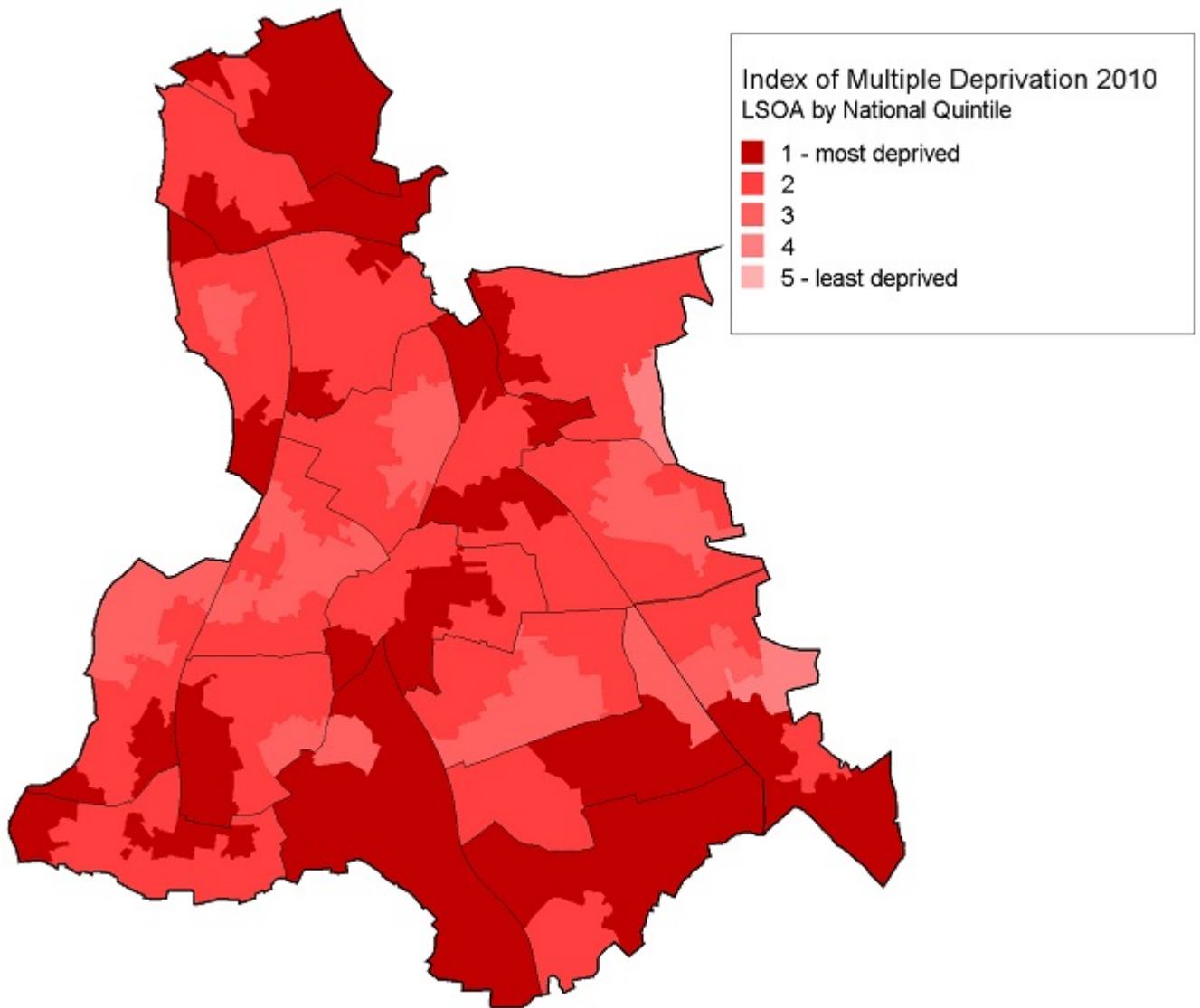


⁶ National Obesity Observatory (2012) Obesity and the Environment: Fast food outlets (Data). Source: <http://www.noo.org.uk/visualisation>, accessed 4/9/2012.

⁷ National Obesity Observatory (2012) Obesity and the Environment: Fast food outlets (Report). Source: http://www.noo.org.uk/uploads/doc/vid_15683_FastFoodOutletMap2.pdf, accessed 4/9/2012.

⁸ Fraser et al. (2010) "The Geography of Fast Food Outlets: A Review" in International Journal of Environmental Research and Public Health, 7, pp2290-2308

4.4 Lewisham is Inner London’s third largest borough in population and area. There is a high proportion of young people with around a fifth of the population under 15 and 8% of the population under 5 years. Overall 45% of all Lewisham residents are of Black and minority ethnic origin. Lewisham is the 31st most deprived local authority in the country. Deprivation is not in isolated areas but is spread across the entire borough, with every ward having Lower Super Output Area (LSOA) in at least 4 Lewisham deciles of deprivation. Of the 166 LSOAs in the borough, 38% are in the most deprived fifth of England, 86% in the most deprived two fifths, and only 1% in the least deprived two fifths. This is shown in the map below which shows the distribution of Index of Multiple Deprivation 2010 in Lewisham by national quintile.



4.5 The proportion of children living in income deprived households varies from 5.7 – 52% across the borough.

4.6 Childhood obesity is a growing threat to children's health and Lewisham has a high proportion of children identified at risk of obesity. Obesity in school children in Lewisham is significantly higher than the England average and results for 2011/2012 show that 11.4% of Reception children and 25% of children in Year 6

are obese in Lewisham, compared to 9.5% of Reception children and 19.2% of Year 6 children in England.

- 4.7 Obesity prevalence in children is linked to socio-economic status with higher obesity prevalence in more deprived areas. Analysis of the national NCMP⁹ (2008/09) revealed that the prevalence of obesity for Reception children in the most deprived group was almost double that of the least deprived group. In year 6 children the prevalence was almost two-thirds higher in the deprived group.
- 4.8 Lewisham's Healthier Communities Select Committee assesses the performance and delivery of services from the perspective of citizens and allows councillors to hold the Council's decision makers and officers to account for the decisions made.
- 4.9 The Committee produced a paper "*Preventing premature mortality review*" (2012) which examined what action was being taken, and what more could be done, to help people in Lewisham live healthier, longer lives. The Committee focused on the lifestyle issues that are primarily responsible for early deaths: smoking, unhealthy diets and lack of physical activity, and made a number of recommendations for the Council as to how they could better support everyone in Lewisham to enjoy a long and healthy life. Two of the Committee's recommendations relating directly to planning are set out below.
- *"Recommendation 20: The Committee notes the use of cumulative impact zones for alcohol, and asks officers to explore the possibility of developing a similar model in relation to fast food outlets, particularly around all Lewisham secondary schools, to develop and promote Lewisham as a healthy choices borough.*
 - *Recommendation 21: The Council should explore developing explicitly, within the local development plan and in all relevant local planning policies, the encouragement of healthy food outlets, shops, businesses and facilities"*
- 4.10 The Council encourages all take-away shops to source their food from ethical and sustainable suppliers. The Council is working to implement the Healthier Catering Commitments Scheme in Lewisham which offers practical solutions on how small changes can make food healthier, often at no cost to the business.

Conclusions

- 4.11 There are high levels of deprivation in Lewisham, alongside high obesity levels and high numbers of take-away shops. These factors combined give rise to serious concern at a local level regarding the impact of hot food take-away shops on human health.
- 4.12 The Council is working to implement healthier eating schemes in the borough and

⁹ Child obesity and socioeconomic status. National Obesity Observatory data briefing. October 2010

at the same time seeks to manage the development of new hot food take-away premises. One way the Council is seeking to do this is through a planning policy included in the DMLP.

5. Policy options

Current policy in the Lewisham UDP

- 5.1 At present, and until the emerging Development Management Local Plan is adopted, the existing planning policy specifically applying to hot food take-away uses is saved Unitary Development Plan policy STC 9 Restaurants, A3 Uses and Take Away Hot Food Shops. This policy focuses on managing and minimising unwelcome environmental impacts such as noise, traffic, odour and refuse and protecting the amenity of nearby residents.
- 5.2 This policy is set out below. Saved UDP policies STC 4, 5, 6, 7 and 8 relate to retail and while they do not specifically refer to take away uses they do support a mix of uses and the vitality and viability of centres and parades by discouraging the loss of A1 shop uses.

STC 9 Restaurants, A3 Uses and Take Away Hot Food Shops

Restaurants, A3 uses and take away hot food shops will be granted permission where they satisfy the following principles:

- (a) their location, design, parking and traffic generation is acceptable and does not conflict with other policies in the Plan;*
- (b) they do not harm the living conditions of nearby residents, including that created by noise and disturbance from users and their vehicles, smell, litter and unneighbourly opening hours; and*
- (c) parking and traffic generation is not a danger to other road users, public transport operators or pedestrians.*

In addition applicants will be expected to provide acceptable arrangements for:

- (d) the efficient and hygienic discharge of fumes and smells, including the siting of ducts - which should be unobtrusive;*
- (e) the collection, storage and disposal of bulk refuse and customer litter; sound proofing, especially to living accommodation above; and*
- (f) the impact on neighbours of the proposed opening hours which will normally be restricted to 8.00 am to 12 midnight in the Major and District Centres and 8.00 am to 11.00 pm in Local Centres and Parades.*

Reasons

Eating out, especially from a fast food establishment, is now considered a normal part of a shopping trip for many people. Town centres are considered the best location for this type of use although the Policy for a Core Area of retail uses needs to be safeguarded. Food and drink establishments are also important for the employment they provide, and for their contribution to the vitality of a centre. Most parts of the Borough are well provided with restaurants, cafés, takeaways, wine bars and public houses. These uses can cause unwelcome noise, traffic, smells and refuse and the Policy is designed to minimise these nuisances. The Council is concerned also to reduce traffic congestion or danger to the public from vehicles. It

is considered necessary to impose conditions on opening hours in some cases in order to protect the amenity of residents who live nearby.

- 5.3 Saved UDP policy STC 9 does not consider the health impacts associated with hot food take-away uses and does not restrict take away uses due to their location, concentration or proximity to schools. As discussed in section 2 above, national, regional and local policy and guidance direct local planning authorities to address health considerations in policy making. Sections 3 and 4 above discuss why take away shops give rise to health concerns both nationally and locally and why planning policies around takeaway shops should now be reviewed.

Policy options

- 5.4 The planning system can assist in addressing national, regional and local concerns regarding take away uses and their impact on human health, particularly children's health. In order to make use of the planning system a planning policy or policies are required.
- 5.5 Three potential approaches were identified in other London boroughs policies, these related to restricting take away uses to specific areas, restricting the concentration and clustering of uses and reducing the proximity to sensitive uses, such as schools.
- 5.6 Directing take away uses to specific areas, such as town centre locations, and restricting those uses in other areas may reduce the overall number of uses but does not consider the key issue of children's health.
- 5.7 Looking at retail survey data of the borough's centres and parades, there is no clear pattern of concentration, for example in the district centres take away uses range from 2% to 10%, and in the local centres it ranges from 10% to 24% (see appendix 1). Therefore a blanket maximum percentage of take away uses, applying to all centres and parades, is not considered appropriate as it does not necessarily respond to the local conditions.
- 5.8 Restricting the presence of take-away shops in close proximity to schools, typically within walking distance of schools, is an approach that could limit children's access to unhealthy foods. This is particularly an issues at lunchtime and immediately before and after school. It does not however consider the issues of take away shops further along the school route.
- 5.9 In areas located further away from schools restrictions on the concentration and clustering of take away uses could be tailored to a type of centre or parade.

Conclusions

- 5.10 The Council recognises the need to lessen the impact of hot food take-away shops on human health. In Lewisham the combination of an over-concentration of take-away shops and high levels of deprivation highlights the negative effects

associated with hot food take away uses. The Council therefore seeks to manage the development of new hot food take-away premises.

- 5.11 The Government acknowledges that overweight and obesity is one of the most widespread threats to health and wellbeing in the country and that there is a link between excess body weight and diseases such as type 2 diabetes, cancer and heart disease. Nationally the Government states that the planning system can and should play a role in reducing the number, and managing the location, of take away shops, particularly in relation to schools.
- 5.12 There is a national and regional emphasis on supporting the health and wellbeing of residents, and a regional direction for local planning authorities to develop policies addressing concerns over the proximity of fast food outlets to schools. It is therefore important for Lewisham to develop a locally specific policy to address the issue of the number and location of take-away shops in the borough, and the associated health impacts.
- 5.13 The emerging Development Management Local Plan can provide a planning policy mechanism to address the issues of concern relating to the location of hot food take-away shops, particularly their proximity to schools to ensure an appropriate and proportionate assessment can be made when planning permission is required.
- 5.14 Of the three policy options discussed under paragraph 2.12 above, it is considered that a combination of restricting take away uses close to schools, through an 'exclusion zone', and managing the number of take away uses in shopping areas would most adequately address the resulting health issues.
- 5.15 A Development Management policy including both these aspects should be developed and included in the emerging Local Plan.

6. Monitoring

- 6.1 Monitoring of health improvements may take time and it will be difficult to directly attribute any improvements specifically to a restriction in take away units. Obesity levels and the impact on other health issues is a long term outcome and restrictions on takeaway units should be considered alongside other measures, such as promoting healthy eating and healthier cooking / ingredients schemes with local businesses.
- 6.2 Monitoring will be carried out through the Annual Monitoring Report (AMR) and retail surveys for the Major, District and Neighbourhood Local Centres, and Local Shopping Parades, which will look at indicators such as:
- The number of take away units across the borough, and in individual centres and parades;
 - The number of new take away units established in the borough;
 - The number of applications refused on the basis of proximity;
 - The number of applications refused on the basis of the number of units in a centre or parade;
 - The Council's success at appeal in relation to take away applications; and
 - The year on year rise in obesity among young children and young people (4-11 year olds). Obesity levels will be measured in reception aged children (4-5 year olds) and those in year 6 (10-11 year olds).

Implementation

- 6.3 The emerging Development Management policy will be implemented through the development management process and the determination of planning applications. The Development Management Local Plan, once adopted, will be a statutory Local Plan document and will carry full weight in the decision making process.

Review

- 6.4 The Council's Annual Monitoring Report will highlight any issues that may need a review. Where such a review of the Development Management Local Plan is required, a timetable for this activity will be included in the Local Development Scheme as resources permit. Changes in National or Regional Planning Policy or progress on Development Plan Documents, which form a part of the Local Development Framework, may also prompt the need for further reviews.

Appendix 1 – Survey data on hot food take-away shops

| Centre / Parade | Total units in centre | | No. of take away shops | | % of take away shops | |
|--------------------------------|-----------------------|-------------|------------------------|-------------|----------------------|-------------|
| | 2011 | 2012 | 2011 | 2012 | 2011 | 2012 |
| Major Centres | 2011 | 2012 | 2011 | 2012 | 2011 | 2012 |
| Lewisham | 313 | 319 | 17 | 16 | 5% | 5% |
| Catford | 201 | 199 | 15 | 15 | 7% | 8% |
| District Centres | 2011 | 2012 | 2011 | 2012 | 2011 | 2012 |
| Blackheath | 123 | 124 | 2 | 2 | 2% | 2% |
| Deptford | 260 | 258 | 14 | 15 | 5% | 6% |
| Downham | 75 | 74 | 7 | 7 | 9% | 9% |
| Forest Hill | 149 | 151 | 14 | 13 | 9% | 9% |
| Lee Green | 86 | 88 | 4 | 4 | 5% | 5% |
| New Cross & New Cross Gate | 195 | N/A | 19 | N/A | 10% | N/A |
| Sydenham | 177 | 178 | 8 | 9 | 5% | 5% |
| Local Centres | 2005 | 2012 | 2005 | 2012 | 2005 | 2012 |
| Brockley Cross | 52 | 59 | 7 | 8 | 13% | 14% |
| Crofton Park | 70 | 69 | 9 | 9 | 13% | 14% |
| Downham Way | 26 | 25 | 6 | 6 | 23% | 24% |
| Grove Park | 57 | 55 | 6 | 7 | 11% | 13% |
| Lewisham Way | 64 | 72 | 7 | 7 | 11% | 10% |
| Local Parades | 2005 | 2011 | 2005 | 2011 | 2005 | 2011 |
| All parades combined (over 80) | 1226 | 1226 | 135 | 145 | 11% | 12% |

Appendix 2 – Review of London Borough take away planning policies

Barking and Dagenham have produced a Supplementary Planning Document, *Saturation Point: Addressing the health impacts of hot food takeaways* (July 2010) which looks in detail at the health issues around take-away shops and sets out three implementation points around proximity to schools, concentration and clustering, and a hot food take-away levy. The Borough Wide Development Policies (March 2011) contain a policy restricting hot food take away shops to 15% of the retail frontage. The justification to the policy refers to the SPD for further guidance, particularly in relation to hot food take away uses near schools (within 400 metres of the boundary of a primary or secondary school).

Tower Hamlets have produced a paper *Tackling the takeaways: A new policy to address fast-food outlets in Tower Hamlets* (2011) to support the draft policy options in the Managing Development – Development Plan Document which was subject to independent examination in September 2012. This policy restricts take away uses by not allowing an over-concentration, not allowing more than 5% take away uses in District centres and by taking into account the location of a school or leisure centre.

Southwark have developed policies tailored to individual areas and have included them in various policy and guidance. The Elephant and Castle SPD (March 2012) restricts take away uses by percentage (5%) and by proximity to each other. The Canada Water Area Action Plan (March 2012) restricts take away uses to no more than two units per frontage. The Peckham and Nunhead Draft Area Action Plan (Submission version, September 2012) restricts take away uses by percentage (5%), proximity to each other and by establishing a 400 metre exclusion zone around secondary schools.

Waltham Forest include a policy relating specifically to A5 take away uses in their Development Management Policies Local Plan: Proposed Submission (July 2012). It resists an over-concentration of uses, with criteria depending on the proposed location. Within Primary, Secondary and Retail Parades uses are restricted to 5% of units. Outside designated frontages and centres, the policy restricts take away uses by their proximity to each other and by a 400 metre exclusion zone around schools, youth centres or parks.

Greenwich, in their draft Core Strategy with Development Management Policies document (2011), limits food and drink uses (including hot food take away shops (A5)) to 25% of the shopping frontage. A policy specifically excludes take away uses within 400 metres of the boundary of a primary or secondary school.

Islington's submission version of the Development Management Policies (August 2012) seeks to manage the location and concentration of take away uses where they would result in an unacceptable concentration of uses in one area and where they are in proximity to schools or sensitive community facilities. The justification to the policy states that take away uses within 200 metres of primary and secondary schools will be resisted.