

LB Sutton's Response to Panel's Question

January 2019



Matter 91: Hot Food Takeaways

Are Policies E9C and E9D relating to proposals containing hot food takeaways justified and consistent with national policy and guidance about healthy communities and limiting the proliferation of certain use classes in identified areas. In particular:

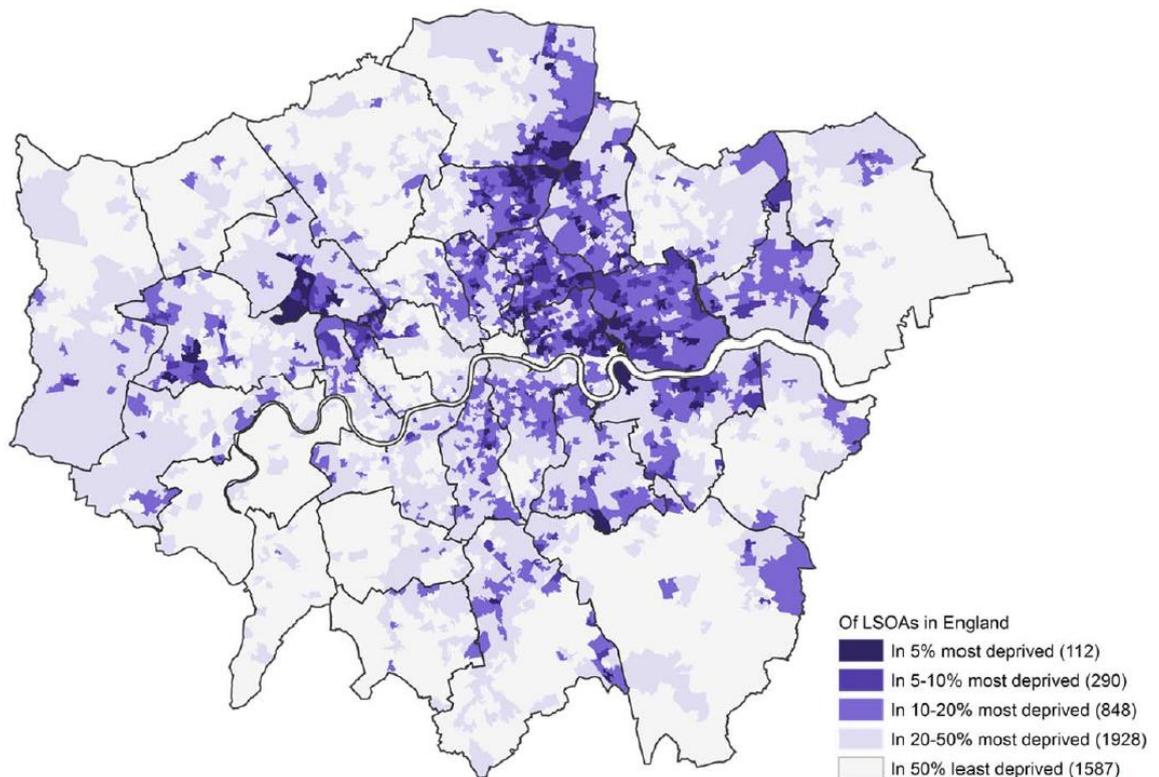
a) Is the development of hot food takeaways and associated planning conditions a matter of strategic importance to London, or a detailed matter that would be more appropriately dealt with through local plans or neighbourhood plans?

- 1.1** The London Borough of Sutton does not consider that the proposed policy regarding hot food takeaways addresses a matter of strategic importance, nor does it consider that the Mayor has provided sufficient evidence to support a London-wide policy regarding proximity to schools.
- 1.2** The impact of hot food takeaways is considered to be a local issue, with concerns about over-concentration and clustering being local in nature, particularly with regard to amenity regarding servicing, odour, noise and litter. Policies to limit hot food takeaways in proximity to schools should be based on an assessment of local evidence in order that they are sufficiently justified.
- 1.3** Planning Practice Guidance (Paragraph 006 Reference ID 53-006-20170728) recognises the role of planning in enabling a healthier environment particularly in proximity to locations where children and young people congregate. However, the guidance refers to need for "*evidence indicating high levels of obesity, deprivation and general poor health in specific locations*". Despite the wide variation in levels of deprivation across the region and differing trends in the prevalence of obesity, Policy E9C seeks to impose a uniform approach across London. The council considers that boroughs are best placed to provide appropriate evidence looking at the local context to justify an appropriate and effective policy response.

b) What evidence is there indicating high levels of obesity, deprivation and general poor health in London?

1.4 Patterns of deprivation and levels of obesity are demonstrated through national indicators, namely the indices of deprivation and the prevalence of obesity as recorded through the National Child Measurement Programme. Public Health England also publishes a range of health indicators for each local authority as a health profile. This data demonstrates, that whilst some areas of London have high levels of deprivation, the pattern is varied across the region. Map 1 below shows many parts of London, particularly the outer boroughs including Sutton, fall within 50% least deprived areas in England.

Map 1: Index of Multiple Deprivation, 2015



Source: GLA Intelligence Briefing English Indices of Deprivation (2016)

1.5 Table 1 below, based on data from the National Child Measurement Programme, demonstrates that prevalence of excess weight and obesity in Sutton are below both London and England averages. In addition, a recent report on obesity statistics¹ noted that a number of London Boroughs, including Sutton, had the lowest percentage of overweight or obese children in England.

¹ House of Commons Briefing Paper Number 3336 Obesity Statistics (2018)

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Table 1

	Sutton	London	England
Reception children – prevalence of obesity (2014/15 – 2016/17)	6.6%	9.7%	9.3%
Year 6 children – prevalence of obesity (2014/15 – 2016/17)	18.3%	21.5%	19.6%
Reception children – prevalence of excess weight (including obesity) (2014/15 – 2016/17)	16.9%	21.3%	22.2%
Year 6 children – prevalence of excess weight (including obesity) (2014/15 – 2016/17)	32.2%	36.3%	33.9%

Source: Public Health England National Child Measurement Programme

c) What evidence is there of over-concentration and clustering of hot food takeaways in London?

- 1.6** The incidence of hot food takeaways and their patterns of location will vary across London. The Fast Food Map (NLP/EC/017) included as evidence to the Draft London Plan shows only very broad density patterns of fast food outlets at a London-wide level. It is considered that boroughs are best placed to provide more detailed evidence on over-concentration and clustering of hot food takeaways and their impact at a borough level, and to provide a tailored approach appropriate to their areas.
- 1.7** The London Borough of Sutton investigated the proliferation of hot-food takeaways within the borough in preparing its recently adopted Local Plan. The council considered the location of hot food takeaways with regard to their proximity to schools, and their clustering and concentration within shopping centres. The council concluded that over-concentration and clustering within shopping centres would limit residents' access to a wider range of retail services and facilities particularly in Local Centres, and created cumulative amenity issues. As such, the council has adopted a policy to prevent over-concentration of hot food takeaways. The council considered that the location of hot food takeaways in proximity to schools, taken together with information on the incidence of childhood obesity, did not justify a policy to limit hot food takeaways within 400m of schools. Indeed, of the 158 hot food takeaways identified in the borough, only one could be argued as being located to attract school children.

d) Would restricting development of hot food takeaways within 400 metres walking distance from the entrances and exits of existing and proposed primary and secondary schools positively support the delivery of policy GG3 "creating a healthy city"?

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- 1.10** Whilst a policy to prohibit hot food takeaways may restrict the availability of potentially unhealthy food options near schools, it will not prevent the consumption of high fat and high sugar food by young people. The limitations of this policy approach are recognised in the Public Health England report 'Obesity and the environment: regulating the growth of fast food outlets' (referred to in Hot Food Topic paper NLP/EC/017, paragraph 8.7) notes that there are only '*theoretical arguments for the value of restricting the growth in fast food outlets*'. This report also notes that there is '*limited evidence of associations between obesity and fast food*', and that '*the complex nature of obesity is such that it is unlikely any single intervention would make a measurable difference to outcomes on its own*'.
- 1.11** The London Borough of Sutton agrees that "the causes of obesity are complex and multifactorial" as noted at paragraph 2.7 of the Hot Food Takeaways Topic Paper (NLP/TP/06). The council supports a range of policies that support a healthy environment. However, any policy to restrict hot food takeaway in proximity to schools should be justified by appropriate local evidence.

Change Required to Make Policy E9 Sound

Delete Part C of Policy E9.