

Domino's Pizza Group plc comments

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Response to Mayor Draft London Plan

Sadiq Khan, Mayor of London

New London Plan

GLA City Hall

London Plan Team

Post Point 18

London SE1 2AA

2 March 2018

Dear Mr Khan

I am pleased to provide comments from Domino's Pizza Group plc on the draft London Plan.

Domino's is the UK's leading pizza brand with over 1,000 stores across the country. As you would expect, London is an important market for us with 130 stores in the Capital operated by a range of franchisees, employing over 4,000 colleagues and serving thousands of customers every day.

We consider, today, we are under-represented in London and see significant opportunities through opening stores both in areas of the Capital where we are not currently represented and in designated Opportunity Areas.

Our comments are based on our experience of the way customers use our stores, which differs significantly from more conventional takeaways. Over 95% of our sales are from orders customers place in advance, either on-line or by phone. Predominantly, we provide a pre-ordered, meal time solution for delivery to a customer's' home or place of work or study. In London, our stores deliver 80% of orders. Passing snack opportunities for customers walking past a store represent a very small proportion of our business.

We understand the challenges in the public health arena and have been working hard to offer customers more transparency and greater choice to make informed decisions. We're keen to operate in compliance with the Healthier Catering Commitment standard.

We have restricted our response to the two areas of the Plan of most interest to our business.

Policy E9, Retail, markets and hot food takeaways

We note the proposal to refuse permission for siting A5 hot food takeaways within 400 metres of both primary and secondary schools, irrespective of whether they are in a town centre or not. Domino's believe this takes an inflexible and overly restrictive approach.

Primary school children are supervised throughout the day and do not leave school premises at lunchtime. There is little opportunity, if at all, for them to enter our stores unaccompanied by an adult. We do not market to children and our stores do not use any promotional materials that would be attractive to them. Nor do we accept online orders from anyone under 18.

Young people of school ages are also just as, if not more, likely to purchase food from a Class A1 convenience store. Indeed, a young person is much more likely to buy a fizzy drink or snack from a convenience retailer rather than a meal from Domino's, given the relative pricing to a meal solution we provide.

We would also argue that a blanket ban on A5 sites within 400 metres in any direction from a school, fails to take account of the wider needs of the local population, including the need to support economic growth, as required by the National Planning Policy Framework.

A blanket ban would result in very large areas within the London boroughs where no takeaways would be permitted. This is where main town centre uses such as hot food takeaways are to be expected, based on national planning policy. Particularly in London, developments are very mixed with different communities living and working together at high density. It is extremely difficult to isolate individual sections of the population without impacting upon others.

In addition, the proposed policy allows for no consideration of the site-specific circumstances. For example, if a site is currently Class A3 use and permission was sought to convert it to a takeaway, the proposed policy would prevent this from happening. However, the site would still be able to supply all the food types which would have been sold at the site were it a hot food takeaway. The only difference, historically, would be that the majority of customers would eat their food at the site, but with the growth of companies such as Deliveroo, Uber Eats and Just Eat, many of these establishments now offer the increasingly popular option of being able to get takeaway food or have food delivered to home or work. We would hope to see greater consistency in the planning requirements for businesses that delivery hot food from retail premises.

In our view, a better approach would be to focus instead on the other element of your proposal, namely to manage over-concentrations of A5 hot-food takeaways within a particular area. We believe that local boroughs should have discretion and flexibility to provide tailored solutions that better reflect the particular circumstances of their area.

Local Development Plans provide a good way to ensure local knowledge and evidence is fully taken into account, rather than using the blunt tool of an exclusion zone. This would help to ensure greater balance and ensure local requirements are met in the best interests of all.

Finally, the 400 metre walking distance seems to us to be an arbitrary distance and there appears to be no detailed justification or evidence for imposing a ban on takeaways within this walking distance from either primary or secondary schools.

We do not believe this proposal is justified and would ask for it to be reviewed with a request that it is not adopted in its current form.

Policy SD6, Town Centres

We fully support the London Plan's town centre first approach. Local town centres are central to the lives of Londoners and we believe commercial premises make a positive contribution to their vitality and viability. Domino's welcomes the opportunity to be present on local high streets, close to our customers.

We similarly recognise the need to adapt and restructure town centres in line with changes in technology and purchasing behaviour, including improved management of servicing and deliveries. In this, we are keen to ensure we can operate in proximity to other businesses.

I hope that these comments are helpful. We believe our stores and franchisees help to support the diversity, vitality and economic vibrancy of London. We are always ready to work in collaboration with individual boroughs and local communities alike to help maintain an appropriate balance of community need and development requirements. Please do contact either me, if you would like to discuss further.

Yours sincerely

David Wild

Chief Executive Officer

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