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DEVELOPMENT
CORPORATION

Healthy Town Centres Study

LOCAL PLAN SUPPORTING STUDY

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MAYOR OF LONDON

22. Healthy Town Centres Study

Document Title	Healthy Town Centres Study
Lead Author	OPDC
Purpose of the Study	Identify approaches to control and assess the impacts of hot food takeaways and betting shops, pawnbrokers, payday loan stores and games arcades.
Key outputs	<ul style="list-style-type: none"> • Policy recommendations for controlling the impact of hot-food takeaways in the vicinity of schools • Policy recommendations for controlling the overconcentration of hot food takeaways in town centres and shopping parades • Policy recommendations to control the overconcentration of betting shops, pawnbrokers, payday loan stores and games arcades • A review of national, regional and local evidence to inform proposed planning policy.
Key recommendations	<ul style="list-style-type: none"> • The Local Plan should take the approach of restricting hot food takeaways around schools in the area. No new hot food takeaways should be permitted within 400m of an existing or permitted secondary school or within 200m of an existing or permitted primary school. • The Local Plan should also seek to avoid an overconcentration of hot food takeaways in town centres. The policy should look to limit the overall percentage of frontage and the proximity of takeaways to one another. Based on a review of other designated centres within the host boroughs and existing concentrations within the OPDC, a limit of 6% of frontage is suggested and a policy requiring no less than two non-A5 units between takeaways. • The Local Plan should limit new betting shops, pawnbrokers, payday loan stores and games arcades so that they result in no more than one betting shop, pawnbroker, payday loan store or games arcade within 400m walking distance of the same use.
Key changes made since Reg 19 (1)	The study has been updated to include recent surveys of Harlesden town centre (LB Brent) and East Acton town centre (LB Ealing) which are both close to OPDC's boundary. These surveys have looked at the current level of provision within the town centres. Other changes include additional information on health guidance and National Planning Practice Guidance as well as updates on policies in the boroughs' Local Plans and the Mayor's Draft new London Plan.
Relations to other studies	Outputs cross relate to the Retail and Leisure Needs Study and Social Infrastructure Needs Study
Relevant Local Plan Policies and Chapters	<ul style="list-style-type: none"> • Policy TCC2 (Vibrancy)

Healthy Town Centres Study 2018

Policy approaches to hot food takeaways, betting shops, adult gaming centres, pawnbrokers and payday loan shops

1. Introduction

- 1.1 This paper sets out the evidence base for the Local Plan policy approach to managing hot food takeaways and betting shops, pawnbrokers, payday loan stores and games arcades.
- 1.2 Many local authorities are successfully managing takeaways around schools and their overconcentration within town centres along with reducing the prevalence of betting shops, pawnbrokers, payday loan stores and games arcades. It is important for OPDC to align policies with the host Boroughs of Brent, Hammersmith and Fulham and Ealing along with providing justification as to why the outlined policy approaches have been chosen.
- 1.3 OPDC have therefore produced this evidence base, setting out national, regional and local evidence to support the proposed policy approach for OPDC's Local Plan.

2. Background

- 2.1 The National Planning Policy Framework (NPPF) states that in order to achieve sustainable development the planning system should contribute to building a strong, responsive and competitive economy, as well as supporting strong, vibrant and healthy communities. One of the twelve core planning principles in the NPPF, which should underpin plan-making and decision-taking, is that planning should "take account of and support local strategies to improve health, social and cultural wellbeing for all". The NPPF directs local planning authorities to work with public health leads and health organisations to understand and take account of the health status and needs of the local population and barriers to improving health and well-being.
- 2.2 National Planning Practice Guidance (NPPG) on health and wellbeing¹ supports local planning authorities to bring forward Local Plan policies which limit the proliferation of certain use classes in identified areas in order to create a healthier food environment. The guidance states that "Local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making."

¹ National Planning Practice Guidance: Health and wellbeing <https://www.gov.uk/guidance/health-and-wellbeing>

- 2.3 Paragraph 2 of the NPPG states that “The built and natural environments are major determinants of health and wellbeing.” The guidance states that the issues that could be considered in respect of health, through the plan-making and decision-making processes, include how:
- development proposals can support strong, vibrant and healthy communities and help create healthy living environments
 - the local plan promotes health, social and cultural wellbeing and supports the reduction of health inequalities
 - the local plan considers the local health and wellbeing strategy and other relevant health improvement strategies in the area
 - opportunities for healthy lifestyles have been considered (for example, planning for an environment that supports people of all ages in making healthy choices and promotes access to healthier food)
- 2.4 The NPPG highlights the importance of developing a healthy community which:
- supports healthy behaviours
 - supports reductions in health inequalities, and
 - enhances the physical and mental health of the community
- 2.5 The NPPG on health and wellbeing was updated on 28 July 2017 to state that:
- “Planning can influence the built environment to improve health and reduce obesity and excess weight in local communities. Local planning authorities can have a role in enabling a healthier environment by supporting opportunities for communities to access a wide range of healthier food production and consumption choices.”
- “Local planning authorities and planning applicants could have particular regard to the following issues:
- proximity to locations where children and young people congregate such as schools, community centres and playgrounds
 - evidence indicating high levels of obesity, deprivation and general poor health in specific locations
 - over-concentration and clustering of certain use classes within a specified area
 - odours and noise impact
 - traffic impact
 - refuse and litter”
- 2.6 Local authorities have a statutory duty to improve the health of their residents conferred by the Health and Social Care Act 2012. Directors of Public Health are statutory chief officers tasked with developing, and supporting delivery of strategies to address local priorities to improve health and reduce inequalities. Borough public health teams commonly lead the preparation of Joint Strategic Needs Assessments and play a key role in developing Health and Well-Being Strategies. The national Public Health Outcomes Framework (PHOF) sets out the key indicators the Department of Health expects local authorities to work towards. The PHOF includes two high-level outcomes to be achieved across the

public health system and a set of indicators to measure progress. The high-level outcomes are:

- 1) increased life expectancy; and
- 2) reduced differences in life expectancy and healthy life expectancy between communities.

- 2.7 The PHOF includes a number of indicators which may be impacted by the availability of hot food takeaways, betting shops, pawnbrokers, payday loan stores and games arcades:
- Prevalence of overweight (including obese) among children in Reception (aged 4-5 years) and in Year 6 (aged 10-11 years);
 - Percentage of adults in employment;
 - Self-reported wellbeing: proportion of people with a high anxiety score;
 - Percentage of children living in low income families;
 - Percentage of the adult population in contact with Secondary Mental Health Services; and
 - Suicide rate.
- 2.8 London boroughs have some of the highest densities of fast food outlets in England.² Hot food takeaways are generally a source of cheap, energy-dense and nutrient-poor food³ and regular consumption of energy dense food from hot food takeaways is associated with weight gain⁴. Within the three wards in the OPDC Area 27% of 4-5 year olds and 42% of 10-11 year olds are overweight or obese, which is higher than the London average.⁵ A survey of Brent secondary school pupils showed that pupils attending schools with takeaways within 400m are more likely to visit a hot food takeaway after school at least once a week (62%) than pupils at schools with no nearby takeaways (43%).⁶
- 2.9 In 2015 Government re-classified betting shops, pay-day loan shops, pawnbrokers and games arcades within a separate use class (sui generis) in order to allow planning to control these uses. Fixed odds betting terminals (FOBTs) are electronic gambling machines which are classified as B2 gaming machines, that allow a maximum stake of £100 to be placed per play and large sums of money can be lost in a very short period of time. FOBTs now account for a higher proportion of betting shop revenue than traditional over the counter betting. The number of B2 gaming machines is limited by gambling legislation to four machines per premises which has driven a proliferation of betting shops on the high street. Problem gambling can negatively affect physical and mental

² Public Health England (2016) Fast Food Map

https://www.noo.org.uk/securefiles/170405_1526//FastFoodmap_FINAL.pdf

³ Prentice, A.M. and Jebb, S.A., Fast Foods, Energy Density and Obesity: A Possible Mechanistic Link. *Obesity Reviews*, 4: 187-194, 2003

⁴ Associations between exposure to takeaway food outlets, takeaway food consumption, and body weight in Cambridgeshire, UK: population based, cross sectional study

⁵ Public Health England and HSCIC 2012-2015

⁶ London Borough of Brent (2014) Takeaway use among school students

<https://www.brent.gov.uk/media/16403699/d26-takeaway-use-brent-school-students.pdf>

health, employment, finances and interpersonal relationships.⁷ Personal unsecured debt is also associated with higher risk of poor health.⁶

- 2.10 The OPDC boundary includes land in the London Borough of Brent, LB Hammersmith and Fulham and LB Ealing. Therefore, OPDC has assessed in detail their policy approaches, evidence bases, health checks in existing centres and reviewed regional and national policy along with associated supporting evidence.

⁷ Ben Cave Associates Ltd (2014) Betting, borrowing and health. Health impacts of betting shops and payday loan shops in Southwark.

3. Definitions

- 3.1 A Hot Food Takeaway (HFT) is classified within The Town and Country Planning (Use Classes) Order 1987 (as amended) as an A5 use, for the sale of hot food for consumption off the premises. This differs to restaurants and cafés (A3) which are for the consumption of food and drink within the premises.
- 3.2 The definition of a betting shop is that the primary activity on the premises must be betting services. Each premises is permitted to have up to four B2 gaming machines, known as fixed odds betting terminals. Gaming machines now account for a higher proportion of betting shop revenue than over the counter betting. It has been suggested that in response to limits on the number of machines per shop, bookmakers are opening multiple shops in close proximity.
- 3.3 A pawnbroker is a store that offers loans in exchange for personal property as equivalent collateral. If the loan is repaid in the contractually agreed timeframe, the collateral may be repurchased at its initial price plus interest. If the loan cannot be repaid on time, the collateral may be liquidated by the pawnshop through a pawnbroker or second-hand dealer through sales to customers.
- 3.4 A payday lender is a company that lends customers small amounts of money at high interest rates, on the agreement that the loan will be repaid when the borrower receives their next wages. Payday lending is a convenient but expensive form of short-term personal credit. Pawnbroker and payday lenders are increasingly offering both services.
- 3.5 An Adult Gaming Centre (AGC) is a place of gambling where access is restricted to persons over 18. An AGC may have a limited number of category B3 or B4 gaming machines (not exceeding 20% of the total number of gaming machines which are available for use on the premises), and any number of category C or D machines. Gaming machines are categorised by their maximum stake and prize: B3 or B4 machines have a maximum stake of £2, category C machines have a maximum stake of £1 and category D machines have different type of machines where the maximum stake varies from 10p to £1.

4. Planning Controls

- 4.1 A hot food takeaway is defined as A5, for the sale of hot food for consumption off the premises. Under permitted development, it can become A1, A2 or A3 without restriction. Any change of use from an existing use to a hot food takeaway (A5) requires permission.
- 4.2 On the 16th of April 2015, betting shops, payday loan shops and pawnbrokers were removed from planning use class A2 and changed to Sui Generis uses in a revision to the Town and Country Planning (General Permitted Development) (England) Order, following the Government's 2014 Technical consultation on planning. The consultation showed overwhelming support for the proposal to require a planning application for change of uses to such uses. Adult Gaming Centres are also sui generis.

5. Regional Policy Context

Current London Plan (2016)

- 5.1 Policy 3.2 in the London Plan (2016) (Improving Health and Addressing Health Inequalities) states that *'boroughs should work with key partners to identify and address significant health issues facing their area'*. The support text of policy 3.2 also states that the detailed design of neighbourhoods is very important for health and well-being and that measures such as 'local policies to address concerns over the development of fast food outlets close to schools' can complement this approach. This is also further detailed in the Mayor of London's Takeaway Toolkit (2012), which recommends 'the promotion of clear guidance in planning policies that allow the restriction of fast food takeaways.'
- 5.2 Policy 4.8 in the London Plan (2016) (Supporting a successful and diverse retail sector and related facilities and services) advises boroughs to use local development frameworks (LDFs) to manage clusters of uses, specifically having regard to their impact on health and well-being. It notes that 'over-concentrations of betting shops and hot food takeaways can give rise to particular concerns' and points readers towards the Town Centres SPG for more detail.

New Draft London Plan (2017)

- 5.3 Policy E9 of the new draft London Plan (2017) states that development proposals containing A5 hot food takeaway uses should not be permitted where these are within 400 metres walking distance of an existing or proposed primary or secondary school. Boroughs that wish to set a locally-determined boundary from schools must ensure this is sufficiently justified. Boroughs should also consider whether it is appropriate to manage an over-concentration of A5 hot food takeaway uses within Local, District and other town centres through the use of locally-defined thresholds in Development Plans.
- 5.4 The supporting text to Policy E9 states that:
- Children living in the most deprived areas of London are twice as likely to be obese as children living in the least deprived areas.
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 - The number of hot food takeaways in London has been steadily rising, with London boroughs having some of the highest densities of hot food takeaways in England.
 - More deprived areas commonly have a higher density of hot food takeaways than other areas.
 - Hot food takeaways generally sell food that is high in calories, fat, salt and sugar, and low in fibre, fruit and vegetables.
 - There is evidence that regular consumption of energy-dense food from hot food takeaways is associated with weight gain, and that takeaway food is appealing to children.
 - It is recognised that the causes of obesity are complex and the result of a number of factors, and that a broad package of measures is required to reduce childhood obesity within London.

- A wide range of health experts recommend restricting the proliferation of hot food takeaways, particularly around schools, in order to help create a healthier food environment.
- Shift and night-time workers find it particularly difficult to access healthy food due to the limited options available to them at night time.

Mayor of London Town Centres Supplementary Planning Guidance

- 5.5 The Mayor’s supplementary planning guidance for town centres states that boroughs are encouraged to manage over-concentrations of activities, for example betting shops, hot food takeaways and pay day loan outlets (SPG implementation part 1.2).
- 5.6 The Town Centres SPG recognises that “there are genuine planning issues affecting amenity, community safety, diversity of uses and the continued success of town centres which justify allowing planning authorities to consider the merits of proposals for betting shops” (paragraph 1.2.30). The SPG also considers pay day loan shops and states “there appears to be a correlation between the number of pay day loan outlets and the level of deprivation of an area. Growth in the number of these outlets has given rise to concerns in some parts of the capital. [...] Where planning permission for change of use is required boroughs can help to limit the growth of payday loan shops by resisting such uses where they will result in an over-concentration and where they could impact on the amenity, character, diversity and/or function of an area” (paragraph 1.2.37).

GLA’s Takeaways toolkit⁸

- 5.7 The London Plan and the Town Centres SPG refer to the GLA’s Takeaways toolkit. This was developed by the GLA’s food team and contains three main recommendations:
- (i) local authorities should work with takeaway businesses and the food industry to make healthier fast food, for example, through the Healthier Catering Commitment
 - (ii) schools should have strategies to reduce the amount of unhealthy food children eat at lunch and on their journey to and from school
 - (iii) planning policies should be used in local development frameworks to address the proliferation of hot food takeaway outlets
- 5.8 The toolkit includes an overview of the research and evidence on the impacts of hot food takeaways with guidance on how to address situations where the clustering and/or proliferation of these uses is putting the vitality and viability of centres at risk as well as research and evidence on the health impacts of hot food takeaways. The Healthier Catering Commitment is a voluntary scheme for food businesses in London which encourages them to reduce consumption of fat, salt and sugar and increase access to fruit and vegetables.⁹ It is supported by the Mayor of London through the GLA’s food team and the scheme is being actively promoted by 24 London boroughs.

⁸ Greater London Authority (2012) Takeaways Toolkit
<https://www.london.gov.uk/sites/default/files/takeawaystoolkit.pdf>

⁹ <http://www.cieh.org/healthier-catering-commitment.html>

London Borough Policies

- 6.1 In order to support the policy approach outlined within the OPDC's Local Plan, OPDC has undertaken a detailed review of policies within the London Boroughs.

Hot Food Takeaways

- 6.2 London Boroughs generally take a *distance* or a *concentration* policy approach to managing hot food takeaways.
- Distance from schools or places attended by children and young people:
 - o The majority of boroughs have used a distance of 400m
 - o All policies include secondary schools
 - o Several policies also restrict hot food takeaways in proximity to primary schools, parks and youth centres.
 - Concentration of A5 uses within a certain stretch of street. This takes several forms:
 - o Percentage of units, for example, no more than 6% of shops within a Town Centre or no more than 15% within a Neighbourhood Centre.
 - o A1 floorspace, for example 60% of any Town Centre shall be A1 use;
 - o Quantum, for example no more than two A5 units being located adjacent to each other.
 - o Distance, for example there should be a minimum of two non-A3/A4/A5 units, or at least 10 metres, between the units, whichever is greater.
- 6.3 A summary of the policy approaches used by London Boroughs is provided in table 1.

Policy Approach	Policy Type			TOTAL number of boroughs
	LP (adopted)	LP (draft)	SPD	
Proximity to schools	2 Hackney Lambeth	1 Richmond upon Thames	1 Islington	4*
Over concentration	9 Barking & Dagenham Camden Croydon Greenwich Haringey Hounslow Merton Newham Sutton	1 Hillingdon	0	10
Both policy approaches used	10 Brent Ealing Enfield H&F Islington Lewisham Redbridge Tower Hamlets Waltham Forest Wandsworth	1 Southwark	3 Barking & Dagenham Waltham Forest Wandsworth	11*
TOTAL number of boroughs	21	3	1*	25

Table 1 - London borough policy approaches to A5 / Hot Food Takeaways, March 2018.

*Where a Borough has both a Local Plan policy (adopted/draft) and SPD policy, only the Local Plan policy has been counted in the totals

- 6.4 Twelve boroughs have adopted Local Plan policies to restrict A5 uses within proximity of schools, including Brent, Ealing, Enfield, Hackney, Hammersmith and Fulham, Islington, Lambeth, Lewisham, Redbridge, Tower Hamlets, Waltham Forest and Wandsworth. Hammersmith & Fulham have adopted a policy which considers quotas of non-class A1 uses, the proximity to existing HFTs and the proximity to schools. Brent and Ealing use a 400m distance from secondary schools and Ealing also includes primary schools in its policy.
- 6.5 Ten London boroughs limit the percentage of A5 units within designated centres in their Local Plans or SPD. The percentages used in the policies are shown in table 2 and generally range from 5% to 20%, with the majority at 5 or 6%. Brent limits the proportion of A5 uses in town centre frontages to 6%.

Borough	Policy Control	Borough	Policy Control
Brent	6% in TC, 15% in NP	Southwark	5% in protected shopping frontages, 1/21 in all other centres
Barking & Dagenham	5% in TC	Sutton	20% in TC
		Waltham Forest	5% in primary, secondary and retail parade
Hillingdon	15% in TC	Greenwich	25% - for all food and drink uses within the retail frontage
Lewisham	5% in Major and District, 10% in Local Centre, 1/19 in Local Parade		
Merton	3/10 in shopping parade	Tower Hamlets	5% in Major, District or Neighbourhood town centres. No more than 1 in NP

Table 2 - Maximum percentages of Hot Food Takeaways permitted by London Boroughs in designated centres. TC = Town centre NP = neighbourhood parade

Betting Shops, pawnbrokers, payday loan stores and games arcades

6.6 Managing betting shops is relatively new in planning policy terms due to the Use Class Order being revised in 2015. Table 3 shows some London borough policies (and draft policy) with regards to betting shops, pawnbrokers, payday loan shops and adult gaming centres. Brent and Enfield have chosen a concentration approach, which controls the amount of uses within a designated frontage. Hammersmith and Fulham will assess the likely impacts of a proposal with regards to cumulative impact on the surrounding area (generally within a 400m radius). Haringey will also assess proposals for betting shops using an overconcentration and saturation method.

Borough	Policy Approach
Brent	4% Betting Shops, 3% AGC/ pawnbrokers/ payday loan
Enfield	Five non-betting shop units between the proposed site and the next betting shop premises, or at least 25m
Hammersmith and Fulham	H&F refer to a 400m walking distance within their supporting text
Haringey	Proposals for new betting shops will be assessed on the number of existing betting shops in the centre; and he need to avoid overconcentration and saturation.

Table 3 –London borough policy approaches to betting shops, pawnbrokers, payday loan shops and adult gaming centres (AGC)

Brent

- 6.7 Brent's policy seeks to prevent adult gaming centres, pawnbrokers and betting shops locating in close proximity to a unit in the same use. The policy wording is shown in paragraph 7.7

Haringey

- 6.8 Policy DM46 in Haringey's Development Management DPD seeks to manage the proliferation and overconcentration of betting shops in order to protect against the adverse impacts that an overconcentration of betting shops can have on the vitality and viability of town and local centres.

- A. Proposals for betting shops will only be permitted where they are appropriately located within the Metropolitan Town Centre, a District Town Centre or Local Centre, having regard to Policy DM42 (Primary and Secondary Frontages) and DM43 (Local Shopping Centres).
- B. Proposals for new betting shops will be assessed against their impact on town centre vitality and viability, having regard to:
 - a. The number of existing betting shops in the centre; and
 - b. The need to avoid overconcentration and saturation of this particular type of use.

Haringey policy wording

Enfield

- 6.9 Enfield's policy DMD 33 seeks to control the negative aspects associated with betting shops.

- Proposals for betting shops will only be permitted if all of the following criteria are met:
- a. The proposed development is located within a local or district centre, or within the secondary shopping frontage of Enfield Town;
 - b. There should be a minimum of five non-betting shop units between the proposed site and the next betting shop premises, or at least 25m, between them, whichever is greater; and
 - c. The proposal should be designed such as to provide an active frontage during the day time and evening, and to have a positive visual impact on the street.

Enfield policy wording

7. Local Policy Approaches

Hot Food Takeaways

Hammersmith and Fulham

7.1 Hammersmith and Fulham Council's Local Plan policies (adopted February 2018) aim to discourage the further increase of businesses such as pay day loan shops, betting shops, pawnbrokers and hot food takeaways which are already well represented. The council considers quotas of non-class A1 uses, the proximity to existing HFTs and the proximity of schools and similar facilities when assessing proposals for hot food takeaways.

Policy TLC2:

In designated town centres additional A4 and A5 uses (pubs, bars and takeaways), betting shops, pay day loan shops, amusement centres, mini cab offices and residential uses will not be permitted on the ground floor of the prime retail frontages.

Policy TLC6:

When considering proposals for hot food takeaways (class A5), and in addition to the quota policies that will apply, the council will take into account the location and nature of the proposal with regard to the proximity of existing hot food takeaways, its compatibility with surrounding uses and, as applicable, available evidence relating to health impacts.

H&F policy wording

7.2 Hammersmith and Fulham run the Healthier Catering Commitment scheme in partnership with the Greater London Authority (GLA) and the Chartered Institute of Environmental Health (CIEH). 49 businesses have been awarded the Healthier Catering Commitment award.¹⁰

Brent

7.3 LBB take both a distance and concentration approach. Brent have identified that many of their Town Centres suffer from an overconcentration of A5 uses within their centres / High Streets. This has been linked back to both obesity data and high street health.

Takeaways will be approved except where it would result in:-

- An A5 use within 400 metres of a secondary school or further education establishment entrance/ exit point;
- More than 6% of the units within a town centre frontage in A5 uses;
- more than 1 unit or 15% of the units within a neighbourhood parade, whichever is the greater, in A5 use;
- less than two non-A5 units between takeaways

Brent policy wording

7.4 18 businesses in Brent have successfully achieved the Healthier Catering Commitment award.¹¹

¹⁰ <https://www.lbhf.gov.uk/business/food-safety/food-safety-and-public-health/healthier-catering-commitment>. Accessed 26.3.18

¹¹ <https://www.brent.gov.uk/services-for-residents/health-and-social-care/healthy-living/healthier-catering-commitment/>. Accessed 26.3.18

Ealing

7.5 Ealing also take both a distance and concentration approach to their policy.

Hot Food Takeaways are not permitted within a ten minute walk (which will normally equate to a 400m radius) of existing schools.
Development must not result in over concentration of a particular use type where this use may erode local amenity by nature of that concentration.
Each new unit must be separated from any unit or group of units by at least two units of other uses.

Ealing policy wording

Betting Shops, pawnbrokers, payday loan stores and games arcades

Hammersmith and Fulham

7.6 Hammersmith and Fulham Council notes that it has a high concentration of betting shops, pawn brokers and payday loan shops per capita and that over representation can have a negative impact on the health and finances of vulnerable members of the community. The council's Local Plan policies (adopted February 2018) seek to limit the amount and concentration of betting shops, pawnbrokers, and payday loan shops in areas of high concentration.

Policy TLC6:

To ensure that shopping areas remain diverse and balanced, the council will seek to manage the concentration of betting shops, pawnbrokers and payday loan shops.

Any proposal for a new betting shop, pawnbroker and payday loan shop will be considered against the provisions of Policy TLC2 and TLC3 and may be granted permission in accordance with the quotas that apply, and where it can be demonstrated that the proposal:

- will not impact adversely on the amenity, character and function of an area;
- will add to the vitality of the existing shopping parade or cluster; and
- will not result in negative cumulative impacts due to an unacceptable concentration of such uses in one area.

Policy TLC2:

In designated town centres additional A4 and A5 uses (pubs, bars and takeaways), betting shops, pay day loan shops, amusement centres, mini cab offices and residential uses will not be permitted on the ground floor of the prime retail frontages.

H&F policy wording

Brent

7.7 Brent also seeks to prevent adult gaming centres, pawnbrokers and betting shops locating in close proximity to a unit in the same use to ensure there is not an over-concentration within any single length of frontage. Brent considers the term pawnbrokers to be inclusive of payday loan companies for the purposes of this policy. The policy comprises a maximum percentage concentration in a town centre / neighbourhood parade and a separation distance.

BETTING SHOPS, ADULT GAMING CENTRES AND PAWNBROKERS

Betting shops, adult gaming centres and pawnbrokers will be permitted where it will result in:-

- no more than 4% of the town centre frontage consisting of betting shops;
- no more than 3% of the town centre frontage consisting of adult gaming centres or pawnbrokers/payday loan shops;
- no more than 1 unit or 10% of the neighbourhood parade frontage, whichever is the greater, consisting of betting shops, adult gaming centres or pawnbrokers/payday loan shops;
- a minimum of 4 units in an alternative use in-between each.

Brent policy wording

Ealing

7.8 Ealing does not have a specific policy relating to betting shops, pawnbrokers, payday loan stores or games arcades

8 Supporting Evidence: Hot Food Takeaways

Obesity and health

- 8.1 Obesity is one of the greatest health challenges facing the UK. London has the highest level of overweight and obesity in 10-11 year olds compared to other regions in England.¹² Obese children are more likely to be ill, be absent from school due to illness, experience health-related limitations and require more GP appointments than normal weight children.¹³ Children who are overweight or obese are at an increased risk of overweight or obesity in adulthood. Overweight and obesity increases the risk of several serious conditions including type 2 diabetes, hypertension, coronary heart disease, stroke, osteoarthritis and cancer.¹⁴
- 8.2 Public Health England (PHE) is the expert national public health agency that fulfils the Secretary of State's statutory duty to protect health and address inequalities, and executes his power to promote the health and wellbeing of the nation. PHE's guidance on obesity and the food environment highlights that the rate of obesity in children increases as socioeconomic deprivation increases. The rate of obesity in the most deprived 10% of children is approximately twice that of the least deprived 10%.¹⁵
- 8.3 The Index of Multiple Deprivation 2015 (IMD 2015) is an overall measure of multiple deprivation experienced by people living in an area. It is based on 37 indicators across seven different domains of deprivation – income; employment; health and disability; education, skills and training; living environment; crime; and barriers to housing and services. Every neighbourhood in England is ranked according to its level of deprivation relative to that of other areas. The OPDC Area is in the top 20% of deprived areas across London.¹⁶
- 8.4 Dietary risk factors for obesity include high energy density foods, diets high in fat and low in fibre, sugar-rich drinks, and consumption of large portion sizes.¹⁷ Hot food takeaways are generally a source of cheap, energy-dense and nutrient-poor food.¹⁸ A single typical fast food meal contains nearly 60% of recommended daily calories, half the recommended daily level of salt and saturated fat, and no portions of fruit and vegetables.¹⁹ Regular consumption of energy dense food from hot food takeaways is associated with weight gain²⁰, higher body fat percentage, and increased odds of being obese²¹.

¹² National Child Measurement Programme - England, 2015-16

¹³ Wijga A, Scholtens S, Bemelmans W, de Jongste J, Kerkhof M, Schipper M, et al. Comorbidities of obesity in school children: a cross-sectional study in the PIAMA birth cohort. *BMC Public Health* 2010;10(1):184.

¹⁴ Government Office for Science (2007) Foresight Tackling Obesity: Future Choices – Project Report 2nd Edition

¹⁵ Public Health England (2017) Health matters: obesity and the food environment.

<https://www.gov.uk/government/publications/health-matters-obesity-and-the-food-environment/health-matters-obesity-and-the-food-environment--2>

¹⁶ Greater London Authority (2016) Socio-economic baseline – Old Oak and Park Royal

https://www.london.gov.uk/sites/default/files/working_paper_74.pdf

¹⁷ Government Office for Science (2007) Foresight Tackling Obesity: Future Choices – Project Report 2nd Edition

¹⁸ Prentice, A.M. and Jebb, S.A., Fast Foods, Energy Density and Obesity: A Possible Mechanistic Link. *Obesity Reviews*, 4: 187-194, 2003

¹⁹ London Health Commission (2014) Better Health for London

²⁰ Associations between exposure to takeaway food outlets, takeaway food consumption, and body weight in Cambridgeshire, UK: population based, cross sectional study

²¹ Fraser LK, Clarke GP, Cade JE and Edwards KL. Fast Food and Obesity. A Spatial Analysis in a Large United Kingdom Population of Children Aged 13–15. *Am J Prev Med* 2012;42(5):e77–e85

- 8.5 There is evidence that takeaway food is appealing to children. Interviews with children in nursery, primary and secondary schools in London and other parts of the UK, conducted by Barnardo's, identified that pupils view 'fast food' as the most tasty and desirable food.²²
- 8.6 London boroughs have some of the highest densities of fast food outlets in England and it has been shown that more deprived areas have a higher density of fast food outlets.²³ Cheap, energy dense fast food is targeted at people in lower income groups who spend a greater proportion of their income on food.
- 8.7 Within the three wards in the OPDC Area 27% of 4-5 year olds and 42% of 10-11 year olds are overweight or obese, which is higher than in Brent, Ealing, Hammersmith & Fulham and London, and significantly higher than the national average, as shown in table 4.²⁴

Region / Local Authority	Prevalence of Obesity (%)		Prevalence of Overweight and Obese (%)	
	4-5 years	10-11 years	4-5 years	10-11 years
OPDC Area (3 Wards: College Park & Old Oak, East Acton, Stonebridge) ^a	13.3	26.2	26.7	42.0
Brent	10.6	24.2	21.7	39.6
Ealing	10.6	23.9	22.6	38.6
Hammersmith & Fulham	9.1	21.0	21.3	34.6
London	10.3	23.2	22.0	38.1
England	9.3	19.8	22.1	34.2

Table 4 – Prevalence of Overweight and Obesity in children in the OPDC Area

Source: National Child Measurement Programme - England, 2015-16

Available at: <http://digital.nhs.uk/pubs/ncmpeng1516>

^a To produce as robust an indicator as possible at small area level, these prevalence estimates use three years of NCMP data combined from 2012/13 to 2014/15. (Public Health England & HSCIC © 2012-2015)

Tackling Obesity

- 8.8 The causes of obesity are complex and multi-factorial²⁵ and therefore it is recognised that the approach to tackling obesity should be multi-faceted. The planning system can be used as part of a wide package of measures to reduce childhood obesity within London.
- 8.9 Reducing childhood obesity is one of PHE's key priorities. PHE's briefing on obesity and the environment highlights the need for planning authorities to take action on obesity, and the

²² Ludvigsen A and Sharma N (2004) Burger Boy and Sporty Girl <http://www.barnardos.org.uk/burger-boy-sportygirl-what-children-say-about-school-meals/publication-view.jsp?pid=PUB-1395>

²³ Public Health England (2016) Fast Food Map

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/578041/Fast_food_map_2016.pdf

²⁴ Public Health England and HSCIC 2012-2015

²⁵ Government Office for Science (2007) Foresight Tackling Obesity: Future Choices – Project Report 2nd Edition

importance of modifying the environment so that it does not provide easy access to energy-dense food. PHE notes that the proportion of food eaten outside the home has increased in recent years. Food eaten outside the home is more likely to be high in calories and hot food takeaways tend to sell food that is high in fat and salt, and low in fibre, fruit and vegetables. In 2014 PHE stated that *'improving the quality of the food environment around schools has the potential to influence children's food-purchasing habits'*, and that *'there are strong theoretical arguments for the value of restricting the growth in fast food outlets'*.²⁶

8.10 PHE guidance published in March 2017 recommends that "Planning documents and policies to control the over-concentration and proliferation of hot food takeaways should form part of an overall plan for tackling obesity and should involve a range of different local authority departments and stakeholders."²⁷

8.11 The National Institute for Health and Care Excellence (NICE) public health guideline on the prevention of cardiovascular disease notes that poor diet and overweight/obesity increase the risk of a heart attack. NICE recommends that planning authorities "restrict planning permission for takeaways and other food retail outlets in specific areas (for example, within walking distance of schools)".²⁸

8.12 The Royal Society for Public Health's *Health on the High Street* report²⁹ identifies the negative impact of fast food outlets on health and makes a series of recommendations to make high streets healthier which include:

- i. using planning controls to limit the concentration of fast food outlets
- ii. encouraging businesses to adopt healthier cooking practices through schemes such as the Healthy Catering Commitment

8.13 In 2014, the Town and Country Planning Association (TCPA) developed 'Six Healthy Weight Environment elements' as part of the Planning Healthy Weight Environments project supported by Public Health England. One of the six elements is a healthy food environment which provides access to healthy food retail. The TCPA recommends that development avoids overconcentration of hot-food takeaways (A5 uses) in existing town centres or high streets, and restricts their proximity to schools or other facilities for children and young people and families.³⁰

8.14 Local authorities and clinical commissioning groups have a statutory duty to develop a Health and Wellbeing Strategy through the health and wellbeing board. The Health and Wellbeing Strategies for the three boroughs in the OPDC Area have all identified that reducing childhood obesity is a priority. Brent's Health and Wellbeing Strategy³¹ recognises that rising obesity is one of the key challenges in Brent. Tackling childhood obesity is one of Brent's key objectives in order to give every child the best start in life. In 2013 Brent's policy evidence base reported that Brent had 41 takeaways within 400 metres of secondary schools, and that the council considers this is a contributing factor to childhood obesity in the borough.³² A study undertaken by Brent Council's Food Safety Team tested 10 products

²⁶ Public Health England (2014) Obesity and the Environment: Regulating the Growth of Fast Food Outlets

²⁷ Public Health England (2017) Health matters: obesity and the food environment.

²⁸ NICE (2010) Cardiovascular disease prevention

²⁹ Royal Society for Public Health (2015) Health on the High Street <https://www.rsph.org.uk/our-work/campaigns/health-on-the-high-street.html>

³⁰ TCPA (2014) Planning Healthy-Weight Environments. A TCPA Reuniting Health with Planning Project

³¹ The Brent Health and Wellbeing Strategy 2014 – 2017 <https://www.brent.gov.uk/your-council/about-brent-council/council-structure-and-how-we-work/strategies-and-plans/health-and-wellbeing-strategy/>

³² Brent Council (2013) Hot Food Takeaways in Brent. Policy Evidence Base

from 10 premises near schools and demonstrated levels of salt, sugar, fat and saturated fat that were well above the recommended nutritional guidelines for children.²⁸

8.15 Key actions in Ealing's Health and Wellbeing Strategy³³ include:

- reducing childhood obesity; and
- using local authority powers and influence over the wider urban environment to increase the availability of healthy food and drink options, particularly in areas of deprivation

8.16 One of the four priorities in Hammersmith & Fulham's Joint Health and Wellbeing Strategy³⁴ is giving children, young people and families the best possible start in life. The Hammersmith & Fulham Health and Wellbeing Board have identified the need to reduce rates of childhood obesity by increasing the number of children that leave school with a healthy weight.

Research findings

Public Perception

8.17 The Great Weight Debate is a London conversation on childhood obesity co-ordinated by the Healthy London Partnership Prevention Programme in partnership with London boroughs, NHS Clinical Commissioning Groups, the Greater London Authority, NHS England (London), and Public Health England (London). Londoners were invited to complete the Great Weight Debate survey from September to December 2016 where they could share their ideas on what they thought could be done to help children in their area lead healthier lives. 2,765 London residents responded to the survey. 86% of respondents thought that tackling childhood obesity in London was the top priority or a high priority. Londoners were asked to select the top three things that they think make it harder for children to lead healthy lives in their areas: 60% of Londoners said 'Too many cheap unhealthy food and drink options' and 44% of Londoners said 'Too many fast food shops'.³⁵

8.18 In a health survey of 1,000 Londoners, 73% of people agreed that the government should limit the number of fast food outlets opening near schools. Only 15% of people disagreed.³⁶ The London Health Commission subsequently recommended in October 2014 that the Mayor support local authorities to protect London's children from junk food through tighter controls within 400 metres of schools.³⁷

Consumption of fast food by school children

8.19 A survey of 11-14 year old school children in Tower Hamlets showed that 54% of children purchased food or drinks from fast food or takeaway outlets twice or more a week. Chips were frequently purchased on their own or with other items like fried chicken or

https://www.brent.gov.uk/media/9511286/Takeaway%20Policy%20Background%20Report_new.pdf

³³ Ealing Health and Wellbeing Strategy 2016-21

https://www.ealing.gov.uk/downloads/download/3755/health_and_wellbeing_strategy

³⁴ Hammersmith & Fulham Joint Health and Wellbeing Strategy 2016-21

<https://www.lbhf.gov.uk/councillors-and-democracy/about-hammersmith-fulham-council/strategies-and-plans/health-and-wellbeing-strategy>

³⁵ <https://www.myhealth.london.nhs.uk/healthy-london/great-weight-debate>

³⁶ GLA Health Poll August 2014 <https://data.london.gov.uk/dataset/gla-poll-results>

³⁷ London Health Commission (2014) Better Health for London

pizzas. 70% of the children said they prefer to buy sweetened fizzy drinks compared to other drinks when purchasing fast food. The authors of the study concluded that actions are needed to either limit the ability of children to access fast food outlets or to substitute the food and drinks available for healthier options.³⁸

8.20 2008 report from the Nutrition Policy Unit of London Metropolitan University found that food outlets close to schools were an obstacle to secondary school children eating healthily, with many local fast food takeaways offering child-sized portions at child-sized prices.³⁹ Further research conducted by London Metropolitan University suggested that 400m was the maximum distance that students could walk to and back in their lunch break.⁴⁰

8.21 A survey of nearly 2,500 Brent secondary school pupils showed that pupils attending schools with takeaways within 400m are more likely to visit a hot food takeaway after school at least once a week (62%) than pupils at schools with no takeaways within a 400m radius (43%).⁴¹

³⁸ Patterson R, Risby A, and Chan M-Y. Consumption of takeaway and fast food in a deprived inner London Borough: are they associated with childhood obesity? *BMJ Open* 2012 ;2:e000402. doi:10.1136/bmjopen-2011-000402

³⁹ Sinclair S and Winkler J (2008) *The School Fringe: What pupils buy and eat from shops surrounding secondary schools*. Nutrition Policy Unit. London Metropolitan University

⁴⁰ *The School Fringe, From Research to Action. Policy Options within schools on the Fringe*. Education Research, Sarah Sinclair, JT Winkler, Nutrition Policy Unit, London Metropolitan University, January 2009

⁴¹ London Borough of Brent (2014) *Takeaway use among school students*

<https://www.brent.gov.uk/media/16403699/d26-takeaway-use-brent-school-students.pdf>

9 Supporting Evidence: Betting shops, pawnbrokers, payday loan stores and games arcades

- 8.1 In order to deliver successful town and neighbourhood centres, high streets must include a range of uses providing a breadth of products and services to encourage a diverse customer base and increased footfall.

Trends and distribution

- 8.2 The number of betting shops, payday loan stores, and pawnbrokers on UK high streets is increasing. A study of 1,300 UK high streets showed a 17% increase in pawnbrokers, payday lenders and betting shops between 2011 and 2013.⁴² In London, there was a 95% increase in pawnbrokers from January 2010 to December 2012, and a 13% increase in the number of betting shops.

Type of use	Number 1 Jan 2010	Number 1 Dec 2012	% Change
Betting Shops	743	840	13.1%
Pawnbrokers	135	263	94.8%

Table 5 - Increase in selected uses in London's town centres
Source: Local Data Company, January 2013

- 8.3 In Brent between 2007 and 2013 the number of betting shops in the town centres increased by 41% from 43 to 61. The number of pawnbrokers and payday lenders increased by 171%, from 7 to 19, over the same period.⁴³
- 8.4 A survey conducted in Hammersmith and Fulham in 2014 showed that 40 of the 46 betting shops (87%) are located within 400m of the most deprived areas of the borough. In addition, 11 of the 15 pawnbrokers and payday loan shops in Hammersmith and Fulham (74%) are located within 400m of the most deprived areas of the borough.⁴⁴
- 8.5 The London Assembly report 'Open for Business: Empty shops on London's high streets' provides evidence that 'low quality' units, such as betting shops, pawnbrokers, games arcades and payday lenders, reduce the overall value of the high street and dissuade other businesses from opening there. The Committee heard complaints about the growing concentration of particular types of shops on London's high streets. The greatest number of complaints were about the proliferation of betting shops, but also the increase in payday loan shops, pawnbrokers, games arcades and fast food takeaways.⁴⁵
- 8.6 Brent Council conducted a series of pedestrian counts in 2009, 2012 and 2013 to compare the footfall adjacent to particular town centre uses. The highest footfall in each survey was recorded adjacent to retailers. The footfall was significantly lower adjacent to betting shops, pawnbrokers, payday lenders and AGCs.⁴⁶

⁴² Local Data Company and the University of Oxford (2013) The State of UK Retail Places

⁴³ Brent Council. A Fair Deal: Betting Shops, Adult Gaming Centres and Pawnbrokers in Brent

⁴⁴ LB Hammersmith and Fulham (2016) Background paper: Betting Shops, Pawn Brokers and Payday Loans Shops

⁴⁵ London Assembly Economy Committee (2013) Open for Business, Empty Shops on London's High Streets

⁴⁶ Brent Council. A Fair Deal: Betting Shops, Adult Gaming Centres and Pawnbrokers in Brent

Impacts on health

- 8.7 In addition to reducing the viability and vitality of town centres, there is increasing evidence that uses such as betting shops, pawnbrokers, payday lenders and AGCs can negatively impact on wellbeing.

Gambling and health

- 8.8 Access to gambling venues increases gambling activity and problem gambling.⁴⁷ Problem gambling has been used to describe gambling that compromises, disrupts or damages family, employment, personal or recreational pursuits.⁴⁸ Problem gambling is linked to poor health, low level and severe mental ill health and a co-dependence on alcohol. While occasional responsible sports betting may be mildly positive, the use of multiple forms of betting, particularly Fixed Odds Betting Terminals by younger adults, can be associated with significant harm to health and wellbeing.⁴⁹
- 8.9 There is evidence to suggest that the growth of gambling establishments, such as AGCs and betting shops, is particularly prominent in areas with high levels of social and economic deprivation. Research in the Journal of Gambling Studies mapped the location and density of gambling machines in Britain and found that areas with high densities of gambling machines had greater levels of income deprivation, more economically inactive people and a younger age profile than other areas. The researchers concluded that the profile of the resident population living in areas with high densities of gambling machines mirrors the profile of those most at-risk of experiencing harm from gambling.⁵⁰

Debt and health

- 8.10 Unmanageable payday lending is linked to poor mental health via indebtedness and financial exclusion. Debt is also linked to co-dependence on drugs and alcohol. Payday loans are used to bridge payments on spending which is integral to health and wellbeing such as food, child essentials, utility bills and emergency needs however the high interest rates may perpetuate the need to borrow more. There is evidence of irresponsible lending and difficulties for consumers in identifying or comparing the full cost of payday loans. Whilst payday lending may fill a void in community financial services, it does not alleviate economic hardship and it can trap users in a spiral of debt.⁵¹

⁴⁷ Ben Cave Associates Ltd (2014) Betting, borrowing and health. Health impacts of betting shops and payday loan shops in Southwark.

⁴⁸ Griffiths, MD (2007) Gambling addiction and its treatment within the NHS. A guide for healthcare professionals

⁴⁹ Ben Cave Associates Ltd (2014) Betting, borrowing and health. Health impacts of betting shops and payday loan shops in Southwark.

⁵⁰ Wardle H et al. 'Risky Places?': Mapping Gambling Machine Density and Socio-Economic Deprivation. J Gambl.Stud. 2012. Available at <http://dx.doi.org/10.1007/s10899-012-9349-2>

⁵¹ Ben Cave Associates Ltd (2014) Betting, borrowing and health. Health impacts of betting shops and payday loan shops in Southwark.

10 Review of Current Centres

- 9.1 In order to better identify the impact that policies within the Borough boundaries and OPDC, High Street Health Checks have been carried out in the two existing centres of North Acton and Park Royal.

North Acton

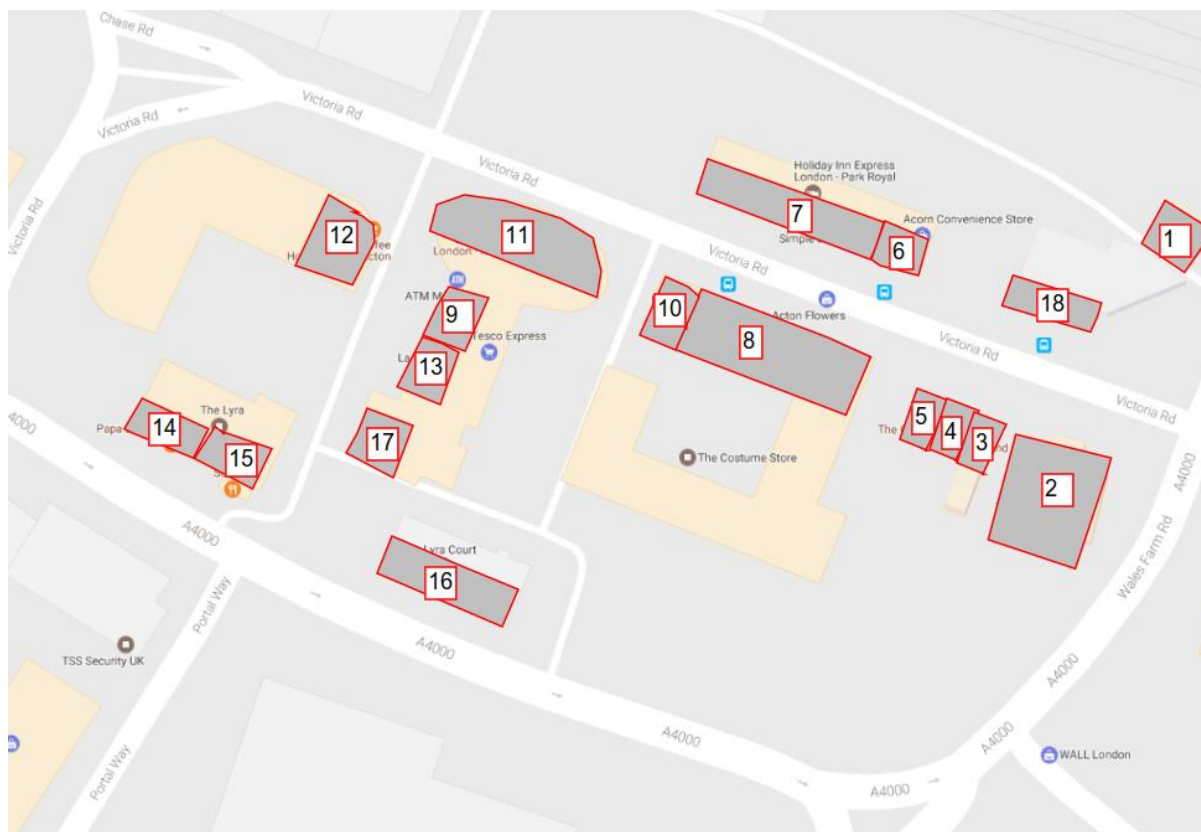


Fig.1 – North Acton Map

Number	Address	Name	Type
1	Sandflames, Victoria Road, London W3 6UN	Sandflames Bar and Grill	A3
2	The Castle, Victoria Road	The Castle Public House	A4
3	142 Victoria Road	Spice Land	A5
4	144 Victoria Road	William Hill	Bookmaker (Sui)
5	154 Victoria Road	The Coffee House	A1
6	Acorn Convenience Store, Victoria Rd, London W3 6UP	Acorn Convenience Store	A1
7	Holiday Inn Victoria Rd, London W3 6UP	Holiday Inn	C1
8	Vacant Unit	Vacant	Vacant
9	192 Victoria Road	Dominos Pizza	A5
10	192 Victoria Road	Costa Coffee	A1
11	182 Ebbet Court, Victoria Road	Tesco	A1
12	Unit 203 Victoria Road	Esquires Coffee House	A1
13	Retail Unit 4, Ebbet Court, Westgate, Victoria Road, North Acton, W3 6BX	Ladbrokes	Bookmaker (Sui)

14	B, Lyra Court, Portal Way, London	Papa Johns Pizza	A5
15	Unit C , The Lyra, Portal Way, North Acton W3 6BJ	Subway	A1
16	Unit A Lyra Court	Vacant	Vacant
17	Retail Unit (Vacant), Lyra Court	Vacant	Vacant
18	Vacant Unit, Victoria Road	Vacant	Vacant

Table 6 – North Acton Town Centre Health Check

9.2 18 completed ground floor units were identified in North Acton centre:

- 11% are betting shops
- 16% are Hot Food Takeaways
- 22% are Vacant
- 5% are A4 (Public House)
- 33% are A1 (2 x retail, 3 x coffee house and 1 sandwich shop)
- 5% are A3

Park Royal

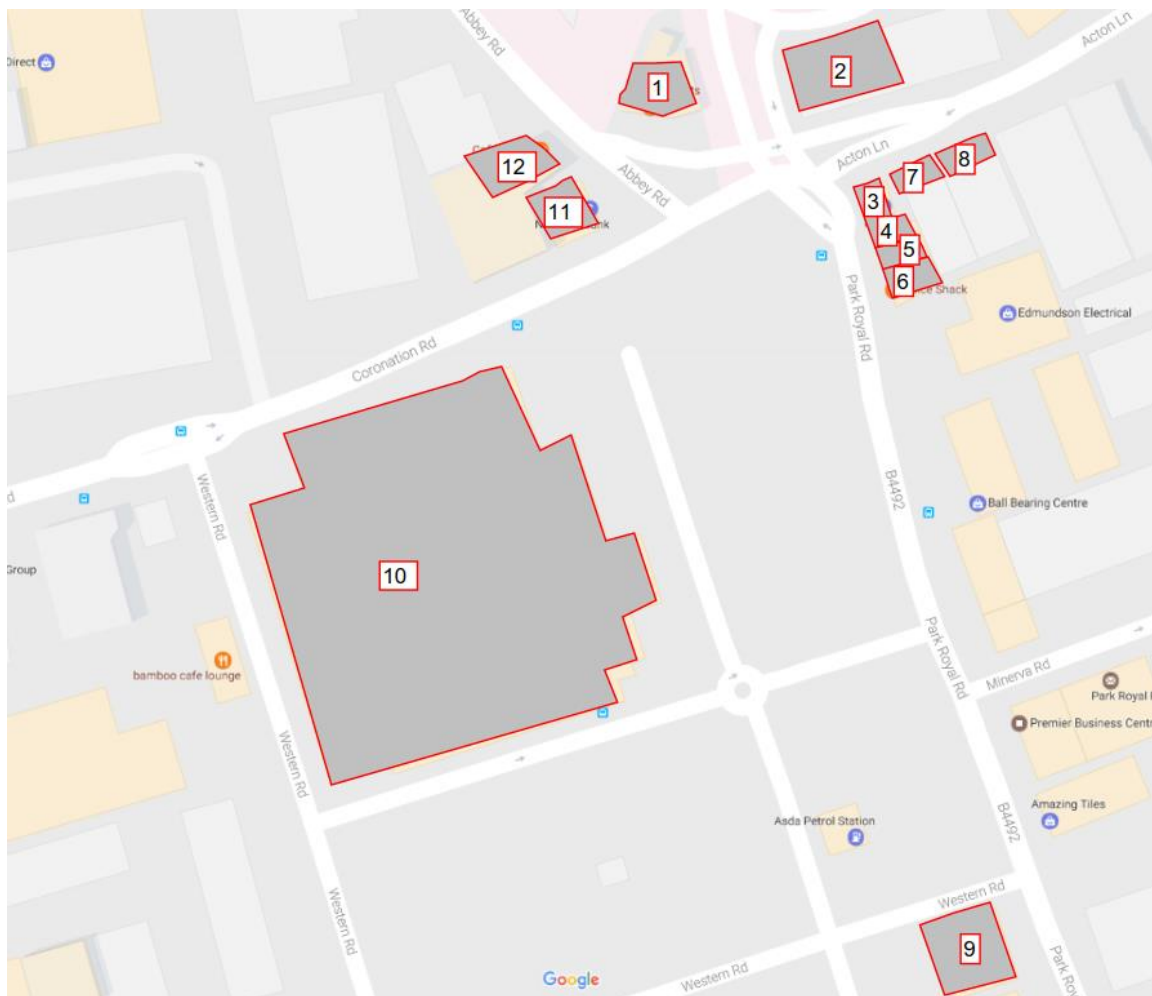


Fig.2 – Park Royal Map

Number	Address	Name	Type
1	Beirut Nights, 19 Abbey Road, London	Beirut Nights	A3
2	Under ASRA	Vacant	Vacant
3	69 Park Royal Rd, London NW10 7JR	HSBC	A2
4	Jade House, 67 Park Royal Rd, London NW10 7JJ	Williams Accountants	A2
5	65 Park Royal Rd, London NW10 7JJ	Subway	A1
6	63 Park Royal Rd, London NW10 7JJ	Spice Shack	A5
7	Street Stall, Acton Lane, Park Royal	Tasty Hut	A5
8	Saraya Café, Acton Lane, Park Royal	Saraya Cafe	A3
9	Acorn House 38, 36 Park Royal Rd, London NW10 7JA	Barclays Bank	A2
10	Asda, 2-20 Western Rd, Park Royal, London NW10 7LW	Costa Coffee	A1
11	1 Abbey Rd, Park Royal, London NW10 7YQ	NatWest	A2
12	20 Abbey Rd, London NW10 7RE	Café Royal	A3

Table 7 Park Royal Town Centre Health Check

- 9.3 12 units were identified in total in Park Royal Centre:
- 33% are in use as A2;
 - 17% are A1
 - 17% are A5
 - 25% are A3
 - 8% are vacant
- 9.4 Park Royal neighbourhood town centre is small but serves the business community of Park Royal. It presently has an overreliance of food establishments, falling into the category of A1, A3 and A5 (58%) and a high concentration of banks (A2, 25%).
- 9.5 It has also been noted that some of the A3 uses operate an extensive 'take out' operation for employees of existing businesses.
- 9.6 There are no identified bookmakers, payday loan companies or pawnbrokers within Park Royal.
- 9.7 This centre analysis shows that there is already a high percentage of hot food takeaways within these existing (and future) designated centres. Both North Acton and Park Royal already have higher concentrations of HFT's than permitted in both the majority of London Boroughs policies and the proposed policy approach in the OPDC Area. OPDC wants to encourage such centres as Park Royal and North Acton to grow, flourish and have a healthy balance of uses across the designated centres and the identified policy approach will assist in managing the overconcentration of such uses.
- 9.8 Whilst there are no identified betting shops, pawnbrokers, payday loan stores or adult gaming centres within Park Royal, there are presently two in North Acton, which amounts to 11% of the occupied shop frontages. This, again, shows the necessity of introducing a robust policy to ensure that there is a healthy balance of uses within the designated town centres.

11 Summary

Hot Food Takeaways

- 10.1 National, regional and local planning policy and evidence supports local planning authorities to prevent an overconcentration of hot food takeaways and restrict hot food takeaways in walking distance of schools, due to the impact of takeaways on health and their cumulative impacts on amenity.
- 10.2 Restricting hot food takeaways around schools and preventing an overconcentration within the OPDC Area will make an important contribution to promoting healthy eating in the area and contribute towards the borough strategies to reduce childhood obesity.
- 10.3 OPDC have considered different policy options for the restriction of hot food takeaways in walking distance of schools:
 - i. within 400m of primary and secondary schools
 - ii. within 400m of secondary schools and 200m of primary schools
- 10.4 The two figures below show the impact of each of these options, based on existing and planned school provision in the Old Oak area.

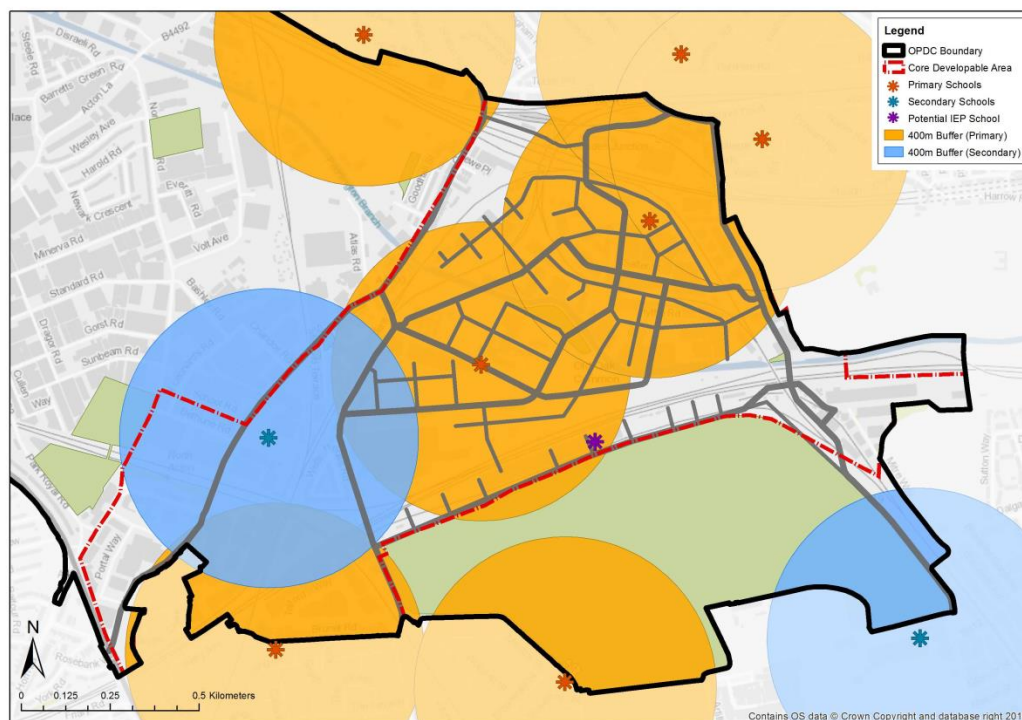


Figure 3: 400m restriction around all schools

- 10.5 Figure 3 shows that a 400m restriction around both primary and secondary schools would exclude almost all of the OPDC Area including the whole of the planned Old Oak High Street and therefore, the Old Oak High Street Major Town Centre would not provide any hot food takeaways. This would be considered unreasonable and OPDC recognise the value of HFT's to the economy, food choice and the need for a balanced approach in order to create a vibrant and healthy town centre.

- 10.6 Since a 400m restriction around both primary and secondary schools would exclude hot food takeaways from the whole of the planned Old Oak High Street, OPDC have deemed that it is appropriate to apply a smaller exclusion zone around primary schools. The presence of hot food takeaways in close proximity to primary schools contributes to an obesogenic environment which encourages younger children to eat takeaway food. Whilst primary school pupils are not allowed out of school premises during the school day, research has indicated that the most popular time for purchasing food from shops is after school⁵² and not all primary school pupils will be accompanied home by an adult.
- 10.7 The majority of secondary school pupils travel to and from school independently and pupils may also be allowed out of school premises at lunchtimes. This means that pupils are able to buy food from takeaways at lunchtimes and on their journey home from school when they are not supervised by an adult. Since secondary school pupils are also likely to be prepared to walk further than primary school pupils it is deemed reasonable to apply a 400m exclusion zone around secondary schools.
- 10.8 A 400m restriction around secondary schools combined with a 200m restriction around primary schools is illustrated in figure 4. The advantages of this policy approach are that:
- i. it allows some hot food takeaways on Old Oak High Street;
 - ii. 400m is a sufficient distance to discourage secondary pupils from buying hot food takeaways at lunchtime and after school;
 - iii. it enables restriction in very close proximity to primary schools, without excluding the whole of the OPDC area; and
 - iv. it is consistent with Ealing's policy which includes a restriction around primary and secondary schools.

⁵² The School Fringe, From Research to Action. Policy Options within schools on the Fringe. Education Research, Sarah Sinclair, JT Winkler, Nutrition Policy Unit, London Metropolitan University, January 2009

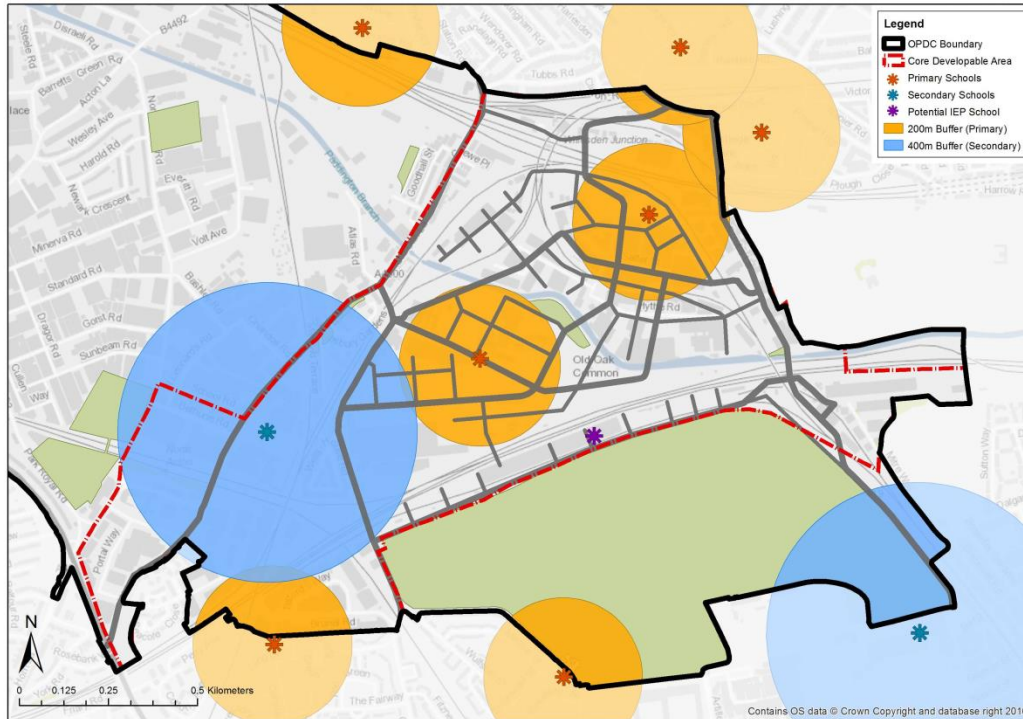


Figure 4: 400m restriction around secondary schools, 200m restriction around primary schools

10.9 OPDC also propose that the overconcentration of uses is managed through policy. Brent Council’s Development Management Policies have recently been found sound and their policy states that no more than 6% of the units within a town centre frontage shall have an A5 use. Given that many of the designated centres within this Local Plan do not exist yet, or are expected to grow significantly, it is important to have a robust policy to manage the types of uses in order to form healthy, thriving centres.

Betting shops, pawnbrokers, payday loan stores and games arcades

10.10 OPDC considers that it is necessary to manage the overconcentration of betting shops, pawnbrokers, payday loan stores and games arcades in order to promote health and wellbeing, and support the vitality and viability of the town and neighbourhood centres in the OPDC area by encouraging a diverse customer base and increased footfall. The outlined policy approach will support these uses where it does not result in an undue concentration of a single use.

12 Proposed policy for hot food takeaways

- 11.1 Based on the evidence within this report, OPDC will propose a 400m boundary from secondary schools and a 200m boundary from primary schools.
- 11.2 In respect of overconcentration in centres, OPDC will seek to adopt a similar approach to the London Borough of Brent, which seeks to ensure that no more 6% of the units within a town centre or frontage are hot food takeaways. As noted above, 17% of units in North Acton and Park Royal Centre are already hot food takeaways.

Planning permission for new takeaways will be supported where they:

- i. are located outside of 400 metres walking distance of the entrance/exit of an existing or permitted secondary school;*
- ii. Are located outside of 200 metres walking distance of the entrance/exit of an existing or permitted primary school;*
- iii. result in no more than 6% of the units within a designated centre or frontage being A5 units;*
- iv. result in no less than two non-A5 units between hot food takeaways*
- v. operate in compliance with the Healthier Catering Commitment scheme.*

- 11.3 OPDC are confident that this policy approach aligns appropriately with the policies in neighbouring boroughs, is in accordance with national and regional planning policy and will contribute towards the viability and vitality of the area's town centres, whilst improving the availability of healthy food for the future residential and working community of Old Oak and Park Royal.

13 Proposed policy for betting shops, pawnbrokers, payday loan stores and games arcades

- 12.1 OPDC have assessed relevant policy stances within other Local Plans and will seek to support proposals for betting shops, pawnbrokers, payday loan stores and games arcade unless they would result in more than one of the same use within 400m walking distance of that use. This is a similar approach taken by Hammersmith and Fulham but OPDC will specify 400m walking distance between uses within the policy rather than the supporting text. OPDC is unlikely to see the scale of town centre as seen in Brent therefore the "percentage of uses" approach as identified in 7.7 would not be appropriate.

Planning permission for new betting shops, pawnbrokers, payday loan stores and games arcades will be supported unless they would result in more than one betting shop, pawnbroker, payday loan store or games arcade within 400m walking distance of the same use.

12.2 OPDC consider that this policy approach is appropriately aligned with the aims and aspirations of neighbouring boroughs whilst promoting healthy and vibrant designated town centres within OPDC, in accordance with regional and national policy.

Appendix 1

OPDC has undertaken further analysis of nearby designated centres to further support the approach outlined within the main section of the report. The two centres are East Acton and Harlesden, which are the two designated town centres closest to OPDC's boundary.

East Acton Health Check Report

A survey of 80 shops within East Acton has been undertaken, to ascertain the health of the town centre. East Acton is located close to OPDC's boundary, approximately 800m south from the western entrance to Wormwood Scrubs park. The survey date was 28/06/2017.

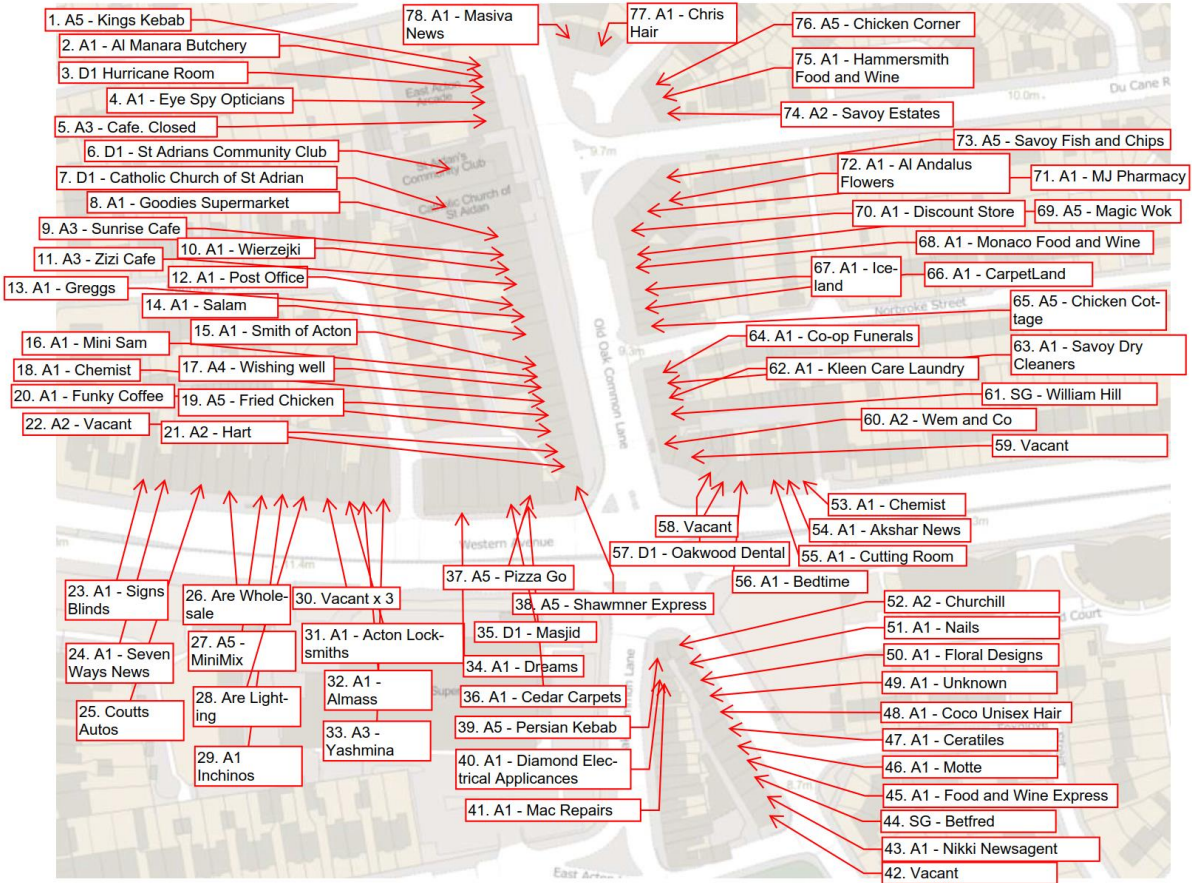
The survey boundary has been taken from Ealing's Local Plan Proposals Map and Hammersmith and Fulham's Policies map. The survey area does not include Homebase and Argos, which are within a stand-alone plot adjacent to the town centre.

Planning Use Class	Number	%
A1 – Shops and retail outlets.	41	52
A2- Professional services.	7	9
A3 - Food and drink.	5	6
A4 - Drinking establishments.	1	1
A5 - Hot food and takeaway.	9	11
B1 – Business uses	1	1
SG – Sui Generis	3	4
D1 – Education, religious or public halls	4	5
D2 - Entertainment and leisure purposes	1	1
N/A	8	10
Total	80	100

The main planning use class is A1 which represents 51% of the frontages within East Acton. Hot Food Takeaways make up the second greatest percentage at 11%. A map shown below shows the spread of these units.

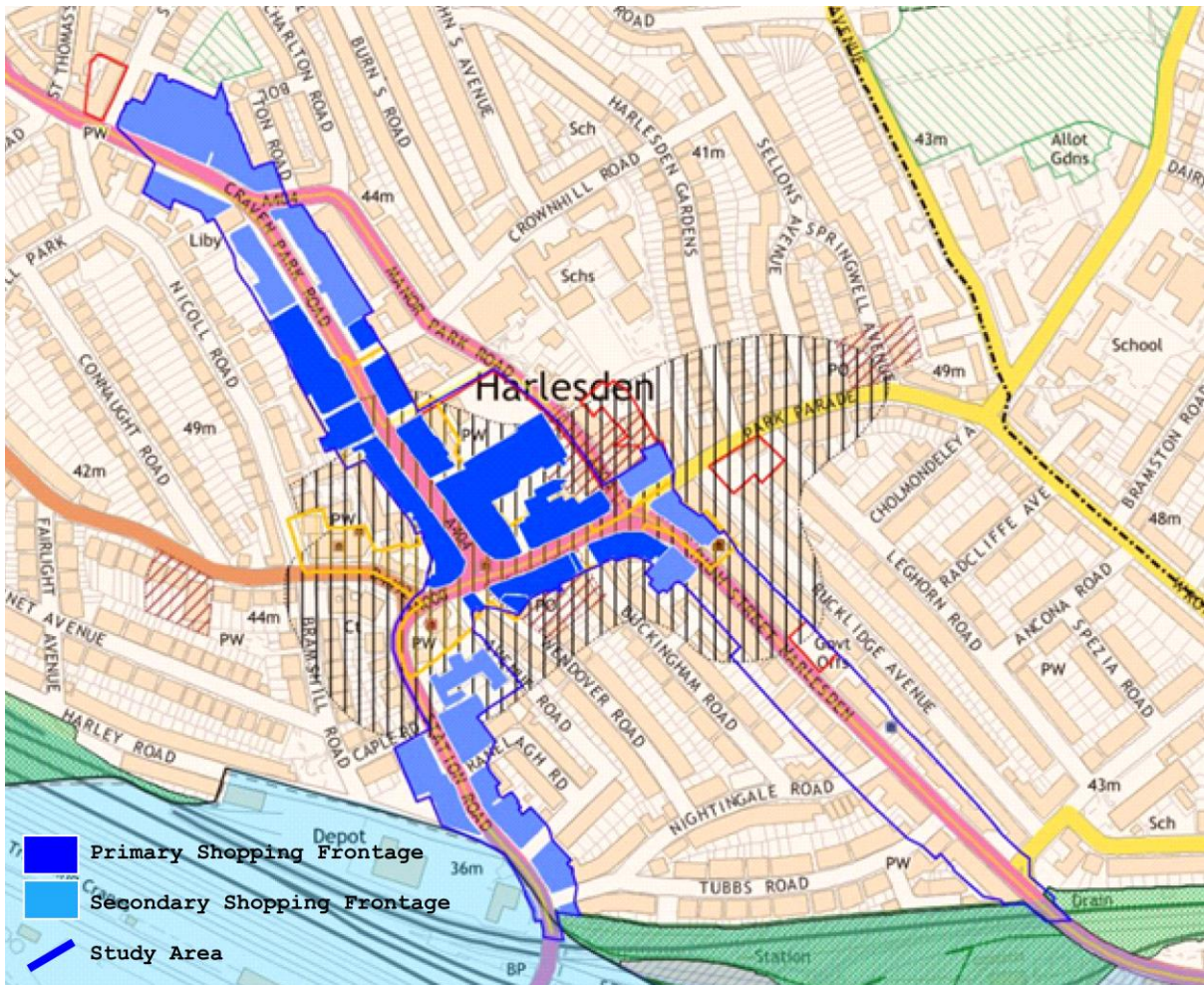
There are two Betting Shops, but no payday loan companies or pawnbrokers within the frontage. The Hot Food Takeaways are generally distributed across the centre however there are instances where collated takeaways are present, especially around the road junction.

Ealing's policies state that development must not result in over concentration of a particular use type where this use may erode local amenity by nature of that concentration and each new unit must be separated from any unit or group of units by at least two units of other uses. There are instances, in a small centre like Acton, which are contrary to this policy. This further supports the requirement for a robust policy approach.



Harlesden Health Check Report

Local Directories have undertaken an assessment of shops within Harlesden town centre. 394 businesses were surveyed. There are 9 betting / gaming shops in the centre and 29 hot food takeaways (Use Class A5). Whilst Hot Food Takeaways only amounted to 7.4%, their concentration within the centre is evident, displayed by the map and table below showing that within 100m of Harlesden Town Centre clock, there are five identified takeaways, three gaming shops, two payday loan shops and two betting shops.



Planning Use Class	Number	%
A1 – Shops and retail outlets.	187	48
A2- Professional services.	29	7
A3 - Food and drink.	38	10
A4 - Drinking establishments.	8	2
A5 - Hot food and takeaway.	29	7
B1 – Business uses	15	4
SG – Sui Generis	20	5
D1 – Education, religious or public halls	33	8

D2 - Entertainment and leisure purposes	0	0.0
Vacant	35	9
Total	394	100

The presence of gaming shops and payday loan companies occupying a substantial amount of the town centre indicates that Harlesden is not conducive to a healthy high street environment.



The analysis undertaken for these two designated town centres illustrates that as well as within the OPDC boundary, the designated town centres surrounding the OPDC area display the characteristics of unhealthy centres, due to the high prevalence of hot food takeaways and proximity of betting shops. Given this existing prevalence of uses within the town centre hierarchy within and surrounding the OPDC area, OPDC considers it necessary to manage the overconcentration of betting shops, pawnbrokers, payday loan stores and games arcades in order to promote health and wellbeing, and support the vitality and viability of the town and neighbourhood.