

NSP Policy 47 Hot food takeaways note

Reference 32 of EIP Inspectors Action List (EIP188)

Justification for hot food takeaways buffer

1. The purpose of this note is to provide the Inspectors of how the map which accompanies P47 Hot food takeaways will look with the addition of primary schools and their 400 metre exclusion zone. It will advise the Inspectors on the justification using 400 metres from school boundary.
2. Policy P47 Hot food takeaways currently requires new hot food takeaways will only be permitted where the proposed location is further than 400 metres from any secondary school's boundary.
3. The London Plan Policy E9 section D says *"Development proposals containing A5 hot food takeaway uses should not be permitted where these are within 400 metres walking distance from the entrances and exits 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"*
4. Our approach differs marginally from the London Plan with the exclusion zone for hot food takeaways being set at 400 metres from the whole site boundary of the school not only from the entrances and exits as suggested by Policy E9. Our justification is discussed below (paragraph 9).
5. The following minor modification is suggested to criterion 3 of the policy to bring it into conformity with the London Plan:
 3. The proposed location is further than 400 metres from any primary or secondary school's boundary; and
6. The following minor modification is also suggested to the reasons section:
 2. ~~Pupils in primary education should not be allowed out of school premises during the school day, and most primary school pupils will be accompanied home by an adult. Secondary school pupils have more freedom during school hours and hot food takeaways located within walking distance of secondary schools are considered a contributing factor to the rising levels of obesity in children. Tackling obesity is one of the key health priorities for Southwark, where children in Reception and Year 6 are recorded as having some of the highest levels of overweight and obesity in the country. Evidence shows that environmental factors influence behaviours in various ways, and this has an impact on the weight status of individuals living, working or learning in a particular area.~~ High numbers of school children have been recorded visiting takeaways after school in Southwark and both school children and adults have complained in focus groups that there are too many takeaways near schools. It is for this reason that an exclusionary zone is set at a radius of 400 metres from the boundary of both primary and secondary schools only (10 minute walk). The emotional and psychological effects of being overweight include discrimination and teasing by peers; low self-esteem, anxiety and depression, potentially impacting educational

~~performance and wellbeing. Obese children may also suffer disturbed sleep and fatigue, impacting quality of life. The proximity of the exclusion area around secondary schools to primary schools, and the restriction of growth of Use Class A5 in shopping frontages, will also assist in limiting the number of hot food takeaways located near primary schools.~~

7. The Publication London Plan Topic Paper (Hot Food Takeaways, 2018) specifies that 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 takeaways or shops is after school and not all primary school pupils will be accompanied home by an adult. The presence of hot food takeaways in proximity to schools also contributes to an obesogenic environment which encourages children to eat takeaway food. The map in Figure 1 of this topic paper shows the buffer areas which would apply in all parts of London around schools including Southwark.
8. Figure 1 below shows Southwark's primary schools and the 400 metre exclusion zones. Figure 2 shows Southwark's primary and secondary schools with the 400 metre exclusion zones as it would look in the updated version of the plan. The Council proposes a main modification that Figure 2 below will replace Figure 7 on page 148 of the Plan. The primary schools and their exclusion zones would also be added to the proposals map which already shows the secondary schools and their exclusion zones.
9. The inclusion of primary schools within the policy is supported by local evidence that in Southwark, children in Reception and Year 6 are recorded as having some of the highest levels of overweight and obesity in the country (SP501 Southwark Hot Food Takeaways Report, 2018).
10. There is justification for the 400 metre exclusion zone to be from the whole boundary of the school site. Most schools have playgrounds, playing fields or additional educational amenity space. It can be reasonably interpreted that these additional facilities would be taken into account in the site boundary. Therefore, the entrance and exits would be located at the edge of the school site.
11. Due to the dense built form of most of Southwark, the site boundary of schools including playgrounds or playing fields is relatively well contained and therefore is not considered overly onerous as a policy requirement.
12. Furthermore, schools may have multiple exit/entry points around the site which may change over time, and pupils can walk in any direction once out of the school site to get home and so could encounter hot food takeaways in any direction from the school site.
13. SP501 Southwark Hot Food Takeaways Report (2018) demonstrates the links between environmental factors and behaviour. One important action is to modify the environment so that it does not promote sedentary behaviour or provide easy access to energy-dense food. Given the health problems

identified in Southwark for children with obesity as set out in SP501, it is considered that the policy is justified.

14. The difference between measuring the 400 metres exclusion zone from the site boundary or from the estimated entry/exit point is negligible. This shown in the comparison illustrations provided in Figure 3.

Figure 1: Hot food takeaway primary school exclusion zones

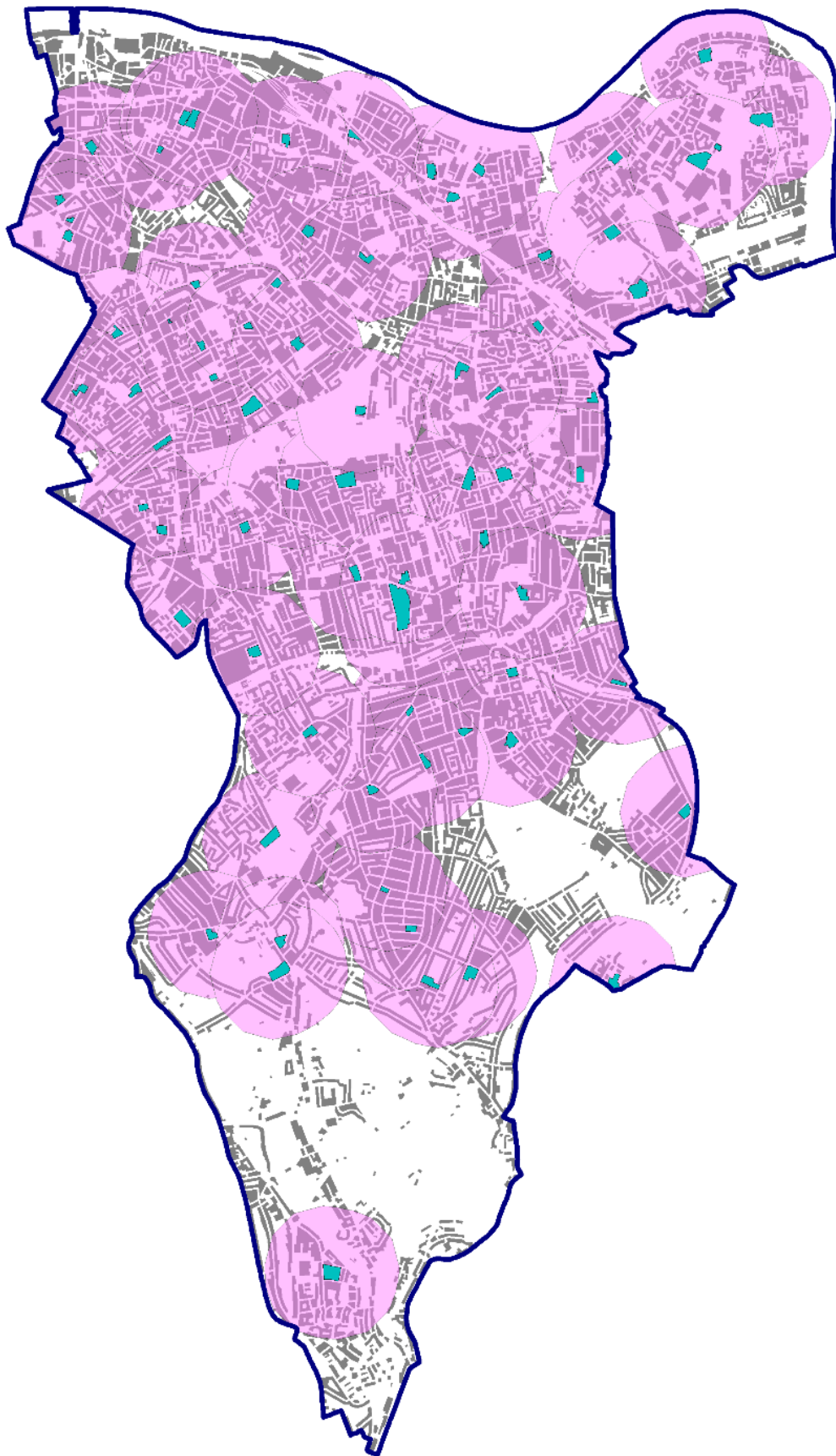


Figure 2: Hot food takeaway primary school and secondary school exclusion zones

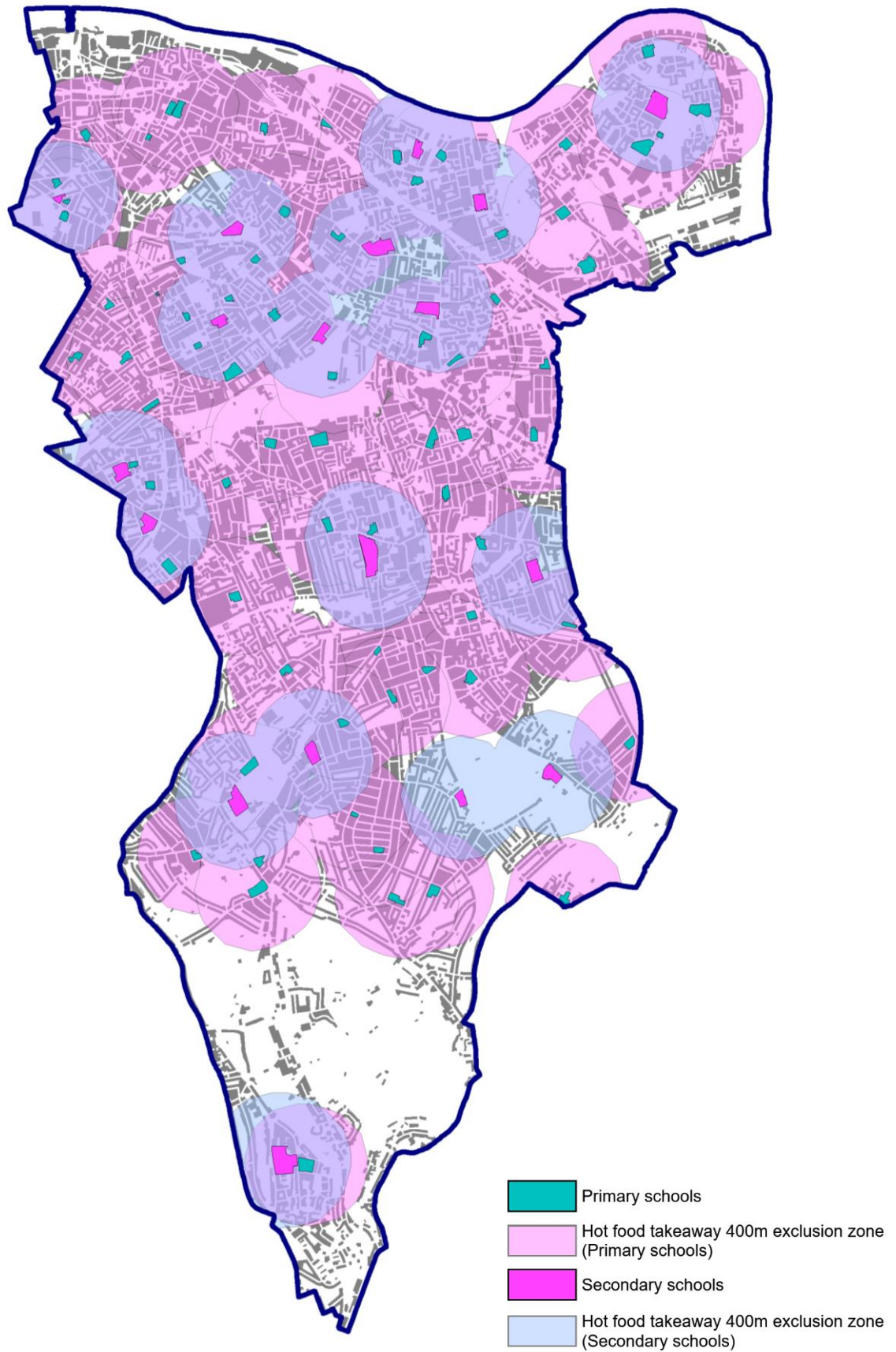
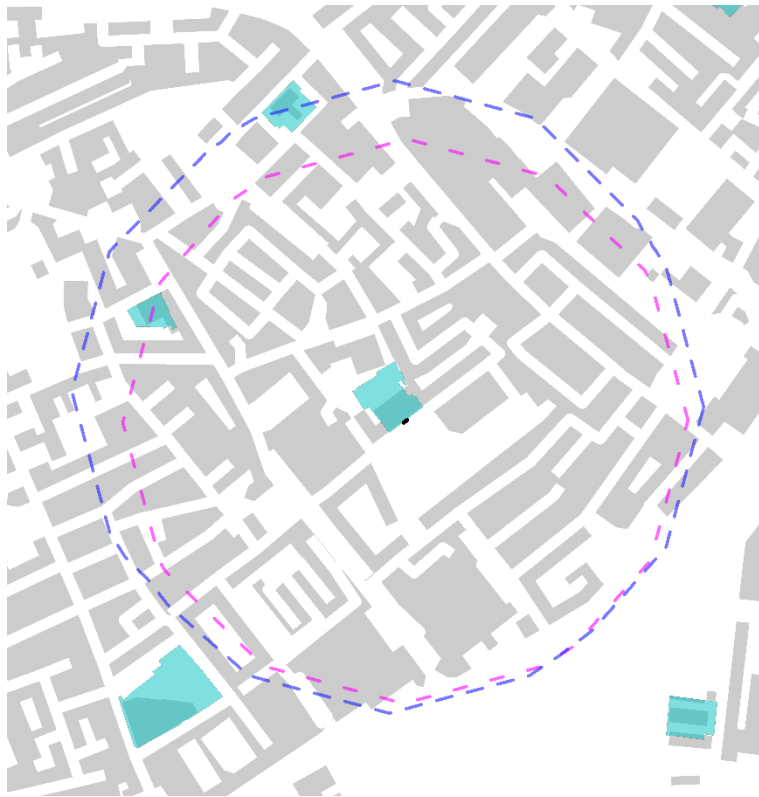


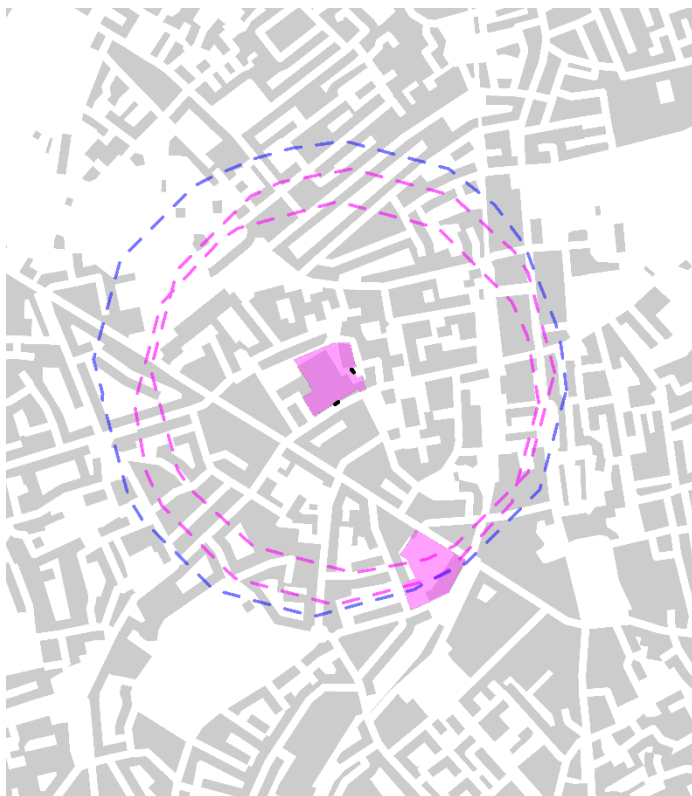
Figure 3: Examples to compare the 400 metre buffer from the site boundary and the entry/exit point

Surrey Square Primary School



Ark
All
Saint
s
Acad
emy

- Primary school
- Primary school entrance/exit
- 400m exclusion zone from school site boundary
- 400m exclusion zone from entrance/exit only



- Secondary School
- Secondary school entrance/exit
- 400m exclusion zone from school site boundary
- 400m exclusion zone from entrance/exit only