

GREATER LONDON AUTHORITY

Development, Enterprise and Environment

Local Plan Team,
London Borough of Haringey,
River Park House (6th Floor),
Wood Green,
London
N22 8HQ

Our ref: LDF14/LDD09/KR

Date: 19 January 2017

By Email to: localplan@haringey.gov.uk

Dear Sir/madam

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007;
Town and Country Planning (Local Development) (England) Regulations
2012**

Haringey Local Plan: Post EIP Mods to:

- Strategic Policies
- Development Management DPD
- Site Allocations DPD
- Tottenham Area Action Plan

Thank you for consulting the Mayor of London on the Draft Local Plan. As you are aware, all development plan documents have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004.

The proposed Modifications generally conform with the London Plan and there are no further specific points from Transport for London. However, I would highlight the following three points for your consideration:

1 The London Plan was updated in March 2016, the full Title is The London Plan (Spatial Development Strategy for London Consolidated with Alterations since 2011). It appears that the previous Modifications were made prior to the above London Plan update, therefore the development Plan Documents should reference this version of the London Plan (rather than the 2015 version).

2 Similarly the Mayor of London's Housing SPG was updated in March 2016.

3 It is noted that in Modification DMMod101, the Inspector proposes to delete Part A of Policy DM47; *'The council will resist proposals for hot food takeaway shops located within 400 metres of the boundaries of a primary or secondary school'*

The proposed change is disappointing considering:

- the evidence about the location of hot food takeaways relevant to Haringey
- London Plan Policy 3.2 and the Mayor's commitment to improving the health of Londoners
- 9 other London Boroughs have adopted a similar approach.

Evidence

Public Health England has 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'*.¹

Haringey has a higher proportion of children who are overweight or obese than the London average. Hot food takeaways are generally a source of cheap, energy-dense and nutrient-poor food and Haringey council has identified that there is a high concentration of A5 outlets near to primary and secondary schools, which increases the availability of fast food to children.

London Plan Policy

Policy 3.2 Improving Health and Addressing Health Inequalities in the London Plan, 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.'* It should be clear from these references that the London Plan is supportive of a policy approach to restrict hot food takeaways close to schools. This position was set out in GLA comments submitted on 4 March 2016 (reference LDF14/LDD09, LDD10, LDD14 & LDD15/CG01) where the GLA supported LB Haringey's proposed policy.

Local authorities and clinical commissioning groups have a statutory duty to develop a Health and Wellbeing Strategy through the health and wellbeing board. Reducing obesity is one of the three key priorities in Haringey's Health and Wellbeing Strategy.² At the centre of Haringey's approach is a whole systems obesity delivery plan which is committed to creating a healthier built environment.³ The policy to resist hot food takeaway shops close to schools is one of a number of measures developed to provide a healthier environment for Haringey residents by improving the availability of healthy food.

Examples from other London Boroughs

Across London, 9 authorities have now adopted Local Plan policies to address hot food takeaways around schools (including Brent, Ealing, Hackney, Islington, Lambeth, Lewisham, Tower Hamlets, Waltham Forest, Wandsworth). A further 5 London Boroughs currently have Local Plan policies in

¹ Public Health England (2014) Obesity and the Environment: Regulating the Growth of Fast Food Outlets

² Haringey's Health and Wellbeing Strategy 2015-2018

http://www.haringey.gov.uk/sites/haringeygovuk/files/health_and_wellbeing_strategy_2015-2018_summary_version_1.pdf

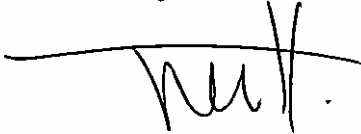
³ Haringey's Obesity Whole System Delivery Plan

http://www.haringey.gov.uk/sites/haringeygovuk/files/whole_systems_approach.pdf

draft form. This is an issue that many boroughs across London have felt appropriate to address through planning policies and the Mayor supports boroughs in using their powers to address this issue.

If you would like to discuss any elements of this response, please contact Kevin Reid kevin.reid@london.gov.uk or 020 7983 4991.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J. Lett', with a long horizontal line extending to the left across the top of the signature.

John Lett
Strategic Planning Manager – London Plan

