

# Hot Food Takeaway Policy Review

## A 5 year review of the effectiveness of Local Plan Policy D.TC5 2019 – 2024

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02/12/2024



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## 1. Executive Summary

- Policy D.TC5 in the Local Plan restricts the opening of new Hot Food Takeaways (HFT) near schools (within 200m) and in areas of high proliferation.
- Research by the Royal Society for Public Health found that nearly all children's visits to fast food outlets were on the return route from school to their home. In Tower Hamlets, the majority of HFTs are within 400m of a primary or secondary school.
- Between 2019 and 2024, 68% (17) of all (25) HFT planning applications were refused. Out of those, 58% (10) were refused using policy D.TC5. This shows the effectiveness of the policy towards reducing HFTs and improving the food environment in Tower Hamlets.
- In addition, 11% (2) out of those refused were refused using London Plan Policy E9 which restricts the opening of new HFT within 400m of a school.
- Proximity to schools was the main reason for refusal of HFT Planning applications.
- Policy TC5 in the emerging Local Plan establishes a 400-meter protection zone, consistent with London Plan Policy E9. Tower Hamlets' local policy reinforces the significance of this regional policy in safeguarding the health and wellbeing of children and young people.

## 2. Purpose of review

This review aims to identify learning from the Hot Food Takeaway (HFT) Policy between 2019-2024. In the context of over proliferation of hot food takeaways in the borough, this will include learning about the best ways to improve high street health and the implications of these learnings in ongoing reviews of the Local Plan.

The objectives of this review are to:

- summarise the rationale for HFT Policy development and describe the policy and governance.
- analyse learning from HFT applications from planning data, focusing on the extent to which HFT applications were refused/alterd as a result of the HFT Policy.
- identify opportunities and challenges, based on the adoption of the HFT Policy, regarding enabling the Local Plan to improve high street health through HFT protection zones.

### 3. Evidence underpinning the hot food takeaway policy

#### The Policy

Policy D.TC5 (Food, drink entertainment and the night-time economy) in the regulation 19 version of the Tower Hamlets Local Plan 2031: Managing Growth and Sharing Benefits restricts the opening of new HFTs in specific areas of Tower Hamlets based on several conditions, including close proximity to schools (within 200m walking distance), over proliferation of HFTs and avoiding harm to the surrounding properties' amenity.

Figure 1: Policy D.TC5, Tower Hamlets Local Plan

<p>Policy D.TC5 Part 3:</p> <p>Development of hot food takeaways (use class A5) will only be supported within the Central Activities Zone, Tower Hamlets Activity Areas, Secondary Frontages of District Centres, Neighbourhood Centres or Neighbourhood Parades where they meet the following criteria.</p> <ol style="list-style-type: none"><li>There must be a separation of at least four non-A5 units between each new hot food takeaway unit.</li><li>The percentage of A5 units would not exceed 5% of the total number of units within Major, District or Neighbourhood Centres.</li><li>Within Neighbourhood Parades there would be no more than one A5 unit.</li><li>The proposal is not within 200 metres walking distance from an existing (or proposed) school and/or a local authority leisure centre.</li><li>The proposal will not harm the amenity of surrounding properties.</li></ol>
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The London Plan 2021<sup>i</sup> contains a London-wide policy to prevent new hot food takeaways from opening within 400 metres walking distance of an existing or proposed primary or secondary school (The London Plan 2021, Policy E9, Page 269, Chapter 6). The London Plan 2021 also requires any permitted development involving hot food takeaways to be conditional upon the operator achieving and operating in compliance with the [Healthier Catering Commitment Standard](#).

Furthermore, the plan encourages boroughs to manage over-concentrations of activities including hot-food takeaways.

There was a deviation between the Tower Hamlets Local Plan Policy (2021) and the London Plan 2021 Policy with regards to the zonal buffer around a school. Tower Hamlets applied the 200 metres protection zone around schools, given the high level of population and development density. The application of a 400-metre protection zone around all schools was considered but this resulted in limited land available for

development outside the protection zone, and therefore Tower Hamlets opted for a smaller protection zone. However, the London Plan 2021 Policy supersedes the Tower Hamlets Local Plan Policy, therefore Tower Hamlets has adopted this approach and there now cannot be a new development with a proposed HFT within 400m of an existing or proposed primary or secondary school.

*Figure 2: Policy E9, London Plan*

London Plan Policy E9, paragraph D and E state:

D: 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. Boroughs should also carefully manage the over-concentration of A5 hot food takeaway uses within town centres and other areas through the use of locally-defined thresholds in Development Plans.

E Where development proposals involving A5 hot food takeaway uses are permitted, boroughs should encourage operators to comply with the Healthier Catering Commitment standards. Where justified, boroughs should ensure compliance with the Healthier Catering Commitment through use of a condition.

The National Planning Policy Framework (NPPF) includes clear objectives for planning and health. A core planning principle (Paragraph 93) states that: “planning policies and decisions should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community”.<sup>ii</sup>

### Reasons for approach

The approach taken to control the development of new hot food takeaways (use class sui generis hot food takeaway, previously A5 - for further definition of these use classes please see Appendix A) has developed in the light of increasing concerns of residents and politicians regarding the overconcentration of takeaways in the borough, especially where they tempt younger residents to consume unhealthy foods that are high in fat, salt and sugar. There is also a strengthening national and local evidence base and revised planning policy guidance relating to this issue.

These policies form part of the council’s overarching strategy to tackle the borough’s obesity and food poverty problems. They aim to prevent hot food takeaways developing in areas disproportionately frequented by children (i.e. in close proximity to schools and local authority leisure centres). Similarly, by ensuring a balance of takeaways within our designated centres, the policy seeks to promote and protect healthy choices and retain the economic diversity of the borough, as well as protecting the attractiveness, vitality, and character of primary frontages.

Regarding issues relating to the relative ‘health’ of hot food takeaways, while it is accepted that not all hot food takeaways sell unhealthy food, there is no assurance that a healthy business model would continue under a ‘sui generis’ hot food takeaway use class. It is possible that business pressures could lead to changes in the type of food sold despite the current best intentions of the appellant. A similar position was reached by a planning inspector at a recent appeal<sup>iii</sup>.

In this document, the term "takeaway" is used to encompass all types of HFT establishments in the borough, as Tower Hamlets holds data at this broader level.

When the term "fast food restaurants/outlets" is used, it refers to a more specific subset of establishments, typically those offering energy-dense foods.

## 4. Over proliferation of HFTs and obesity in Tower Hamlets

### Obesogenic environments and health context

The nature and quality of the built environment, where we spend most of our time, has a major impact on our health. The food available, neighbourhood design, housing, transport and access to health care and schools are all recognised as key features in promoting health, yet not everyone has equal access to health promoting options.

Many people find it challenging to eat healthily, primarily because we are living in less than healthy environments, where less healthier food options are the default, making it harder to maintain healthier lifestyles. Meals eaten outside of the home tend to be associated with higher intakes of sugar, fat and salt, and portion sizes tend to be bigger.<sup>iv</sup> The increasing consumption of out-of-home meals has been identified as an important factor contributing to rising levels of obesity.<sup>v</sup> In the UK, fast food outlets constitute a significant portion of the dining landscape. As of recent data, about 26% of all eateries in England are fast food outlets.<sup>vi</sup> This figure highlights the substantial presence of fast-food options, which are particularly concentrated in poorer areas where there are five times more fast food outlets compared to more affluent neighbourhoods.<sup>vii</sup>

Findings suggest that the strongest determinants of out-of-home food availability are density of food outlets and deprivation within the built environment.<sup>viii</sup>

Obesity is one of the most important preventable challenges to health. It is associated with reduced life expectancy and is a risk factor for a range of chronic diseases, including cardiovascular disease, type 2 diabetes, at least 12 kinds of cancer, liver, and respiratory disease, and can also impact on mental health.<sup>ix</sup>

The increasing consumption of out-of-home meals that are often cheap and readily available at all times of the day has been identified as an important factor contributing to rising levels of obesity.<sup>x</sup> More than one quarter (27.1%) of adults and one fifth of children eat food from out-of-home food outlets at least once a week.<sup>xi</sup> These meals tend to be associated with higher energy intake; higher levels of fat, saturated fats, sugar, and salt, and lower levels of micronutrients.<sup>xii</sup>

In a 2023 survey<sup>xiii</sup> from the Food Standards Agency, 40% of respondents had eaten food from a fast-food outlet in the four weeks prior to the survey. Additionally, the survey showed that respondents who had children in the household (74%) were more likely to have eaten food from a takeaway than those who did not have children aged 16 years or under in the household (56%). Respondents were most likely to eat out or buy food to take out for dinner, with 64% doing this 2-3 times a month or less often and 26% doing this about once a week or more often.

Fast food is generally more energy-dense (up to 65%) than a typical diet, which means it contains more calories per gram of food.<sup>xiv</sup> This is a significant factor

contributing to the higher risk of obesity and other health issues associated with frequent consumption of fast food.<sup>xv</sup> A study highlighted by the British Journal of Nutrition found that fast food consumers tend to have higher total energy intake and energy density compared to those who consume less fast food.<sup>xvi</sup> The increased energy density of fast food meals can lead to a higher overall caloric intake, contributing to weight gain and obesity risks.<sup>xvii</sup>

Analysis from Public Health England (now known as the Office for Health Improvement and Disparities) in 2018 shows the density of fast-food outlets varies per local authority, ranging from 26 to 232 outlets per 100,000 population, with the average across England being 96.<sup>xviii</sup> This provides evidence highlighting the availability of fast-food outlets in some of the country's most disadvantaged areas.<sup>xix</sup> An analysis of data from the National Diet and Nutrition Survey indicated that regular takeaway consumption also disproportionately impacted on the daily energy intake of children from less affluent households.<sup>xx</sup>

In a West Midlands study on the exposure to fast food in a deprived community, 30% of food samples exceeded the previously existing children's Guidelines Daily Amount (GDA) for total fat and saturated fat and 27% of salt analyses exceeded the previous salt GDA.<sup>xxi</sup> The consumption of fast food has been associated with higher Body Mass Index (BMI) scores, higher body fat scores and increased odds of being obese.<sup>xxii</sup>

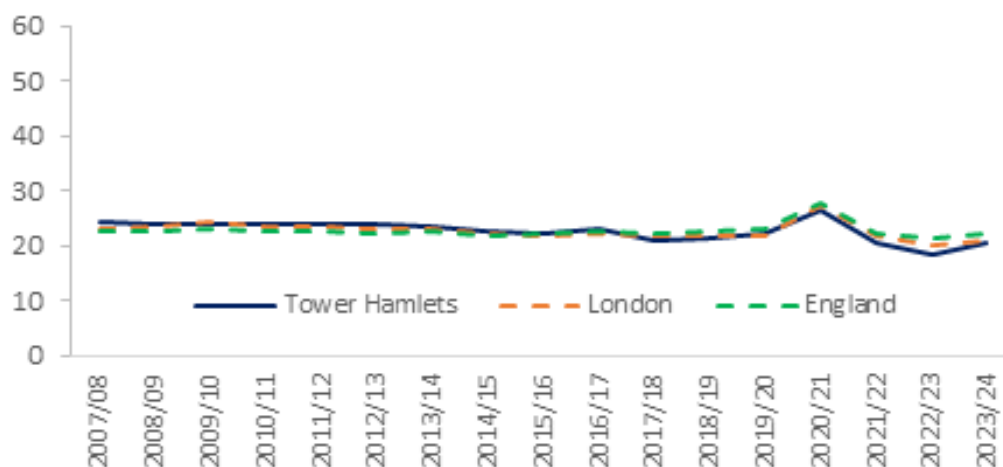
### **Healthy Weight Levels for Children in Reception Classes**

Last year's NCMP data revealed that 18.5% of children in Reception classes in Tower Hamlets were overweight. This was significantly lower than the England average of 21.3%, and lower than the London average of 20%. In isolation, it was difficult to know whether this marked a meaningful improvement in healthy weight levels for young children in the borough.

Looking at this year's data, we see no evidence of a meaningful improvement as the proportion of children who are overweight is back up at 20.5% which is consistent with earlier rates and, of note, not significantly different to London or England averages (see Figure 1).



**Figure 1: Reception – Prevalence (%) of Overweight in Tower Hamlets compared with London and England, 2007-2024.**



More broadly in Reception classes in Tower Hamlets, 2.9% of children are underweight, 76.5% are a healthy weight, and 11.1% are obese. Of note, this obesity rate is significantly higher than London and England averages (see Table 1).

**Table 1: Prevalence data (%) for weight categories Reception ages in 2023/24 in Tower Hamlets compared with London and England.** Prevalences which are significantly worse than the England average are highlighted in bold. This table represents data for weight categories: underweight, healthy weight, overweight (incl/obese) and obese.

	<b>Tower Hamlets</b>	<b>London</b>	<b>England</b>
Underweight	<b>2.9%</b>	1.9%	1.2%
Healthy weight	76.5%	77.2%	76.8%
Overweight (incl. obese)	20.5%	20.9%	22.1%
Obese	<b>11.1%</b>	9.8%	9.6%

New analysis looking at 5 years of combined NCMP data for children in Reception and change over time since the inception of the programme in 2009, has revealed a decrease in rates of children who are obese from **12.8%** in 2009/14 to **11.1%** in 2019/24. This decrease mirrors regional and national trends, but the statistical significance of this change is to be determined.

### Healthy Weight Levels for Children in Year 6 Classes

In Year 6 classes in Tower Hamlets, 2.7% of children are underweight, 55.6% are a healthy weight, and 41.7% are overweight, which is significantly higher than London and England averages (37.8% and 35.8% respectively; see Figure 2).



**Figure 2: Year 6 – Prevalence (%) of Overweight in Tower Hamlets compared with London and England, 2007-2024.**



Within the overweight category, **27%** of children in Year 6 in Tower Hamlets are obese and this is significantly higher than London and England averages (see Table 2).

**Table 2: Prevalence data (%) for weight categories Year 6 ages in 2023/24 in Tower Hamlets compared with London and England. Prevalences which are significantly worse than the England average are highlighted in bold. This table represents data for weight categories: underweight, healthy weight, overweight (incl/obese) and obese.**

	<b>Tower Hamlets</b>	<b>London</b>	<b>England</b>
Underweight	<b>2.7%</b>	2.1%	1.7%
Healthy weight	<b>55.6%</b>	60.1%	62.5%
Overweight (incl. obese)	<b>41.7%</b>	37.8%	35.8%
Obese	<b>27.0%</b>	24%	22.1%

New analysis looking at 5 years of combined NCMP data for children in Year 6 and change over time since the inception of the programme in 2009, has revealed an increase in rates of children who are obese from **25.6%** in 2009/14 to **27.2%** in 2019/24. This increase mirrors regional trends in London and national trends in England but again, whether this marks a statistically significant difference is undetermined.

### Density of takeaway outlets

In Tower Hamlets, the density of takeaway outlets is significantly higher than the national average. As of 2024, the borough has 373 takeaway outlets, which constitutes over 20% of all food outlets in the area.<sup>xxiii</sup> This equates to around 120

takeaway outlets per 100,000 population<sup>xxiv</sup>, compared with the national average of 96 fast food restaurants per 100.000 population.<sup>xxv1</sup>

A variety of factors contribute to the high rates of childhood obesity in Tower Hamlets including deprivation, lack of green space and the extremely high density of fast-food outlets. Nicknamed “Chicken Mile”; Mile End road in Whitechapel is just one example of many streets in Tower Hamlets overpopulated by fast food businesses.<sup>xxvi</sup>

A study of children in Tower Hamlets found more than 50% purchased food or drinks from fast food/ takeaway outlets twice or more a week, with about 10% consuming it daily.<sup>xxvii</sup>

Research funded by the Tower Hamlets Public Health Team in 2018 and undertaken by ‘Shift Design’ mapped and nutritionally profiled restaurants across the borough. The project worked closely with restaurants on Burdett Road to capture sales and cost data, co-design in-restaurant interventions to reduce calorie content of meals and test their impact on sales, customer satisfaction and costs. The study observed the competition caused by over-concentration of fast-food takeaways often negatively impacts upon the nutritional quality of food served. This happens in two ways: 1) restaurant owners often cite large portion size as a way to attract and retain custom; and 2) to compete on price, restaurant owners feel pressured to use cheaper ingredients, which tend to have higher fat content and/or absorb more fat during cooking. Other studies in the borough found instances where takeaway chip portions contained unnecessarily high levels of trans fats approaching 90% of the recommended daily allowance (GDA).<sup>xxviii</sup>

### **The association between obesity and the abundance of hot food takeaways in deprived areas**

Areas where energy-dense foods of low nutritional value are readily available and where there are few opportunities to purchase healthier foods are likely to pose a risk to a population’s dietary health and increase obesity levels.<sup>xxix</sup> Exposure to areas with a high density of takeaway outlets is associated with excess consumption of takeaway foods and excess body weight.<sup>xxx</sup>

The 2024 Obesity Profile<sup>xxxi</sup> report highlighted that those living in the most deprived areas have higher obesity rates than those living in less deprived areas. A systematic review of 14 papers found that there was good evidence of more hot food

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<sup>1</sup> In the national analysis ‘fast food’ refers to energy dense food that is available quickly, therefore it covers a range of outlets that include, but are not limited to, burger bars, kebab and chicken shops, chip shops and pizza outlets. Local data represents all takeaways across Tower Hamlets which represents a broader range of establishments.

takeaways in deprived areas, and that children who spend time in deprived neighbourhoods tend to eat more fast food and have higher BMIs.<sup>xxxii</sup>

The disproportionate concentration of takeaway outlets in poorer areas – like Tower Hamlets - risks reinforcing inequalities in diet and obesity, with those living in unhealthy neighborhoods finding it more difficult to make healthy food choices.<sup>xxxiii</sup>

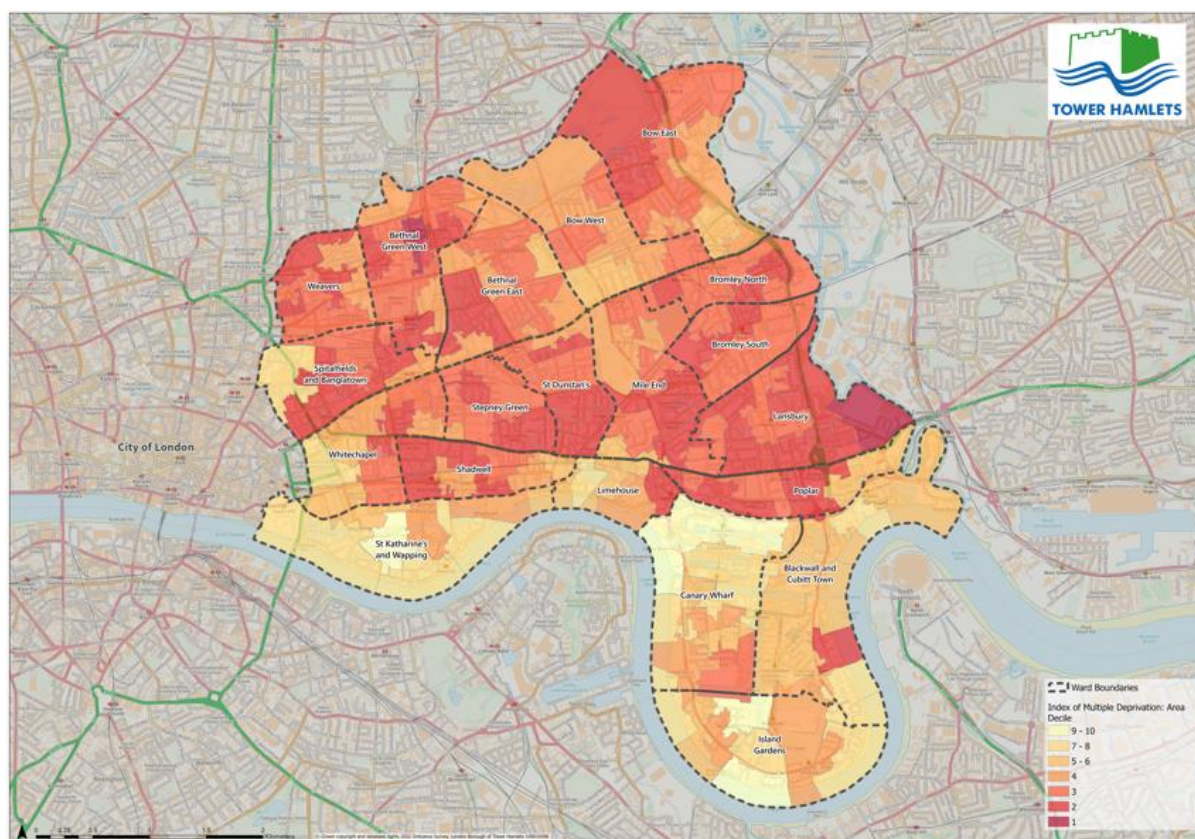
A study by Public Health England (now known as the Office for Health Improvement and Disparities)<sup>xxxiv</sup> in 2018 found definitive evidence that in some areas, particularly in areas of high deprivation, small, independent food retailers are being undermined by a proliferation and density of hot food takeaways. This creates what it terms 'food deserts', areas characterised by limited access to affordable, healthy food options.

Exposure to fast food restaurants drives up temptation to eat fast food in a variety of ways, including making it more available and accessible, as well as through the marketing of foods high in salt, fat and sugar.<sup>xxxv</sup>

### **Tower Hamlets: deprived areas**

In Tower Hamlets there are 42 takeaway outlets and convenience stores per school compared with the London average of 25.<sup>xxxvi</sup> In addition, 97% of residents live within ten minutes of a fast-food outlet.<sup>xxxvii</sup> Tower Hamlets has high levels of inequality: it is home to some of the most deprived areas of the country, as well as some of the least deprived (see Figure 3.) Deprivation is associated with many adverse outcomes, including poorer health outcomes and lower life expectancy.

**Figure 3: English Indices of Deprivation Map 2022 – Tower Hamlets.** The key shows that the darker the colour, the more deprived the area is.



### The proximity of hot food takeaways to schools

Research by the Royal Society for Public Health found that nearly all children's visits to fast food outlets were on the return route from school to their home. This means that understanding the immediate environment around schools and how to influence it is critical in improving the flow of healthier food options in a child's everyday experience.<sup>xxxviii</sup>

Young people are exposed to unhealthier food and drink in many out-of-home environments. The frequency that children and families visit such outlets is therefore important.<sup>xxxix</sup> Secondary school pupils often buy food from a range of outlets in the school fringe for their lunch or on their way to and from school.<sup>xl</sup> Takeaways that are situated close to schools risk undermining efforts to provide healthy school food.<sup>xlii</sup>

A recent study published in the British Journal of Nutrition found that the availability and accessibility of ultra-processed foods like fast food near schools contributes to higher consumption rates among students.<sup>xliii</sup> Adolescents are likely to purchase and consume this type of food on their way to or from school. Adolescents from lower socioeconomic backgrounds tend to consume more ultra processed foods like fast food, influenced by the affordability and convenience of these foods.<sup>xliiii</sup>

Children sometimes skip lunch to save money which can be spent after school at fast food outlets.<sup>xliv</sup> A large scale (n=10,645) study of secondary school children from 30 schools in one large UK city found that 2.9% reported never eating regularly and 17.2% reported daily consumption of junk food.<sup>xlv</sup> Proximity to schools is suggested

to be a key factor in secondary school pupils' decisions about where to purchase food, but the evidence is equivocal.<sup>xlvi</sup>

A longitudinal study of 29 secondary schools (including those in Tower Hamlets) found a significant increase in the number of takeaways, grocers and convenience stores within 800 metres of a school, between 2001 and 2005. This had a small negative effect on adolescent diet with a decrease in average healthy and an increase in unhealthy diet scores.<sup>xlvii</sup>

CaraHER et al (2014) also reported fast food outlets increasingly clustering around schools, providing numerous opportunities for pupils to purchase energy dense foods.<sup>xlviii</sup> Some takeaways located near schools have been shown to target children with special deals within their price range. One study found outlets offering four fried chicken wings for £1, or a large portion of chicken and chips for just £1.99, undercutting the price of the average secondary school lunch.<sup>xlix</sup>

There are concentrations of fast-food outlets near schools and students report using these.<sup>i</sup> The schools that enforce their closed gate policy had some success restricting their students' from getting lunch at fast food outlets.<sup>ii</sup> However, many students report skipping lunch in order to save money and eat after school at these outlets. The research concluded local policy was needed to improve the food offered in the immediate environment around the school.<sup>iii</sup>

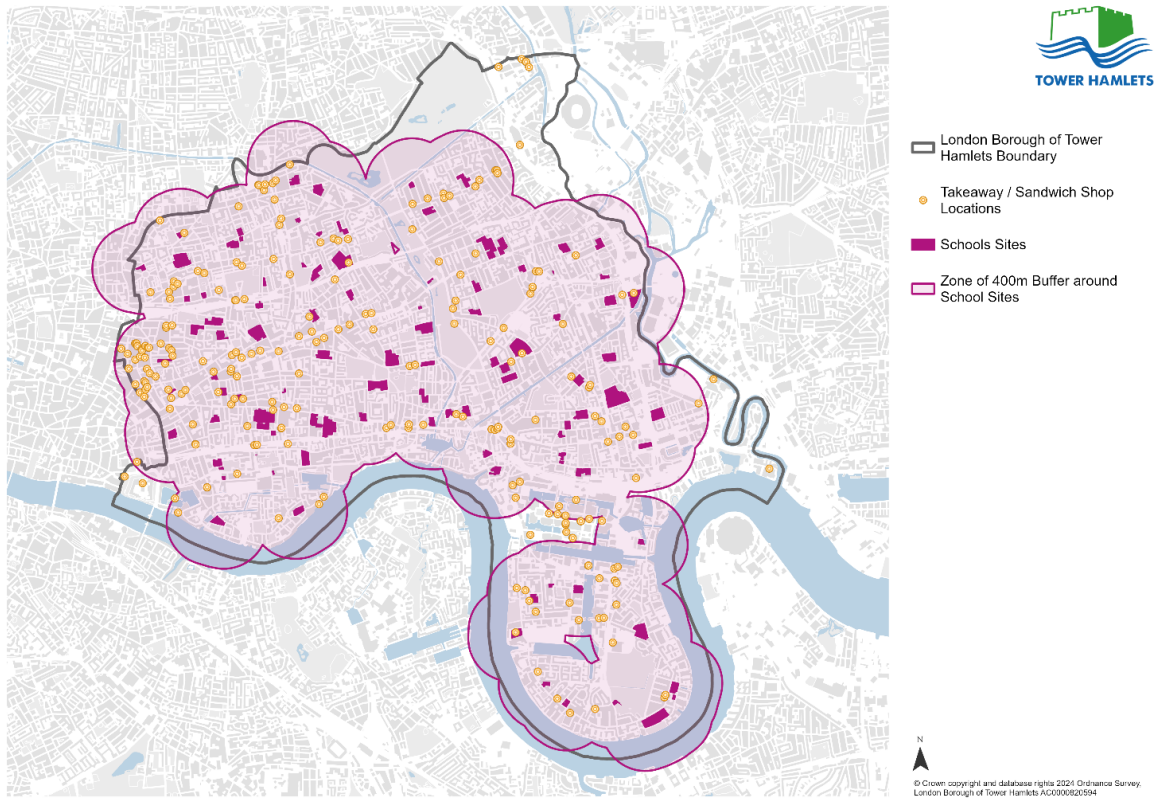
The research outlined above emphasizes the temptation that HFTs near schools present to children and adolescents. Frequent visits to these establishments have been shown to negatively impact dietary health, posing a significant risk to young people. Poor dietary habits during childhood and adolescence can lead to various health issues. Therefore, it is crucial to improve the immediate environment around schools to safeguard the well-being of children and young people.

### **Tower Hamlets: The proximity of hot food takeaways to schools**

In Tower Hamlets, the majority of Hot Food Takeaways are within 400m of a primary or secondary school (see Figure 4 below).



**Figure 4: Schools in Tower Hamlets and neighboring boroughs with a 400m buffer zone around them, with all hot food takeaways highlighted (2024).** This map includes a key to highlight the London Borough of Tower Hamlets boundary, takeaway/sandwich shop locations, school sites, and a zone of 400m buffer around school sites.



## 5. Policy Analysis: Reviewing HFT planning applications

Table 3 below shows the outcomes for planning applications for hot food takeaways in Tower Hamlets since 2019. This shows a clear trend to refusal since this 2020. Further details are presented below.

**Table 3: Outcome of HFT planning applications, 2019 to 2024.**

	All HFT Applications	Permitted	Refused	No Decision Yet	Disposed
<b>2019/2020</b>	12	5	6	0	1
<b>2020/2021</b>	4	1	3	0	0
<b>2021/2022</b>	2	0	2	0	0
<b>2022/2023</b>	2	0	2	0	0
<b>2023/2024</b>	5	0	4	1	0
<b>Total</b>	<b>25</b>	<b>6</b>	<b>17</b>	<b>1</b>	<b>1</b>

### 2019/2020

There was a total of 12 HFT planning applications in 2019/2020, of which five were permitted, six refused and one was disposed of (there was no decision made on this and no subsequent appeal on non-determination.) Out of the five applications permitted, two were within 200m of a school: These two were approved regardless of meeting the threshold for HFT policy, for the following reasons:

- Permission was granted despite the development not aligning with relevant planning policy, as the hot food takeaway was already in operation. Given the impact of the COVID-19 pandemic, the Council supported a two-year temporary loss of A1 use to sustain this viable business. This temporary permission prevents the permanent loss of A1 use in the Roman Road East district centre, in line with policy D.TC5 of the Local Plan 2031
- Additional floorspace was sought for a Restaurant (A3)/Hot Food Takeaway (A5). Since permission for A5 use had already been granted, there was no increase in the number of takeaways in the borough. Although the applicant initially requested the extra space for the takeaway, it was confirmed that the additional area would be used for restaurant purposes, with the ground floor serving as both seating and a takeaway waiting area.

The other three applications were permitted because they did not meet the threshold for Policy D.TC5.



Out of the six applications refused, three were within 200m of a school and policy D.TC5 was used to refuse. The other three were refused based on heritage grounds and to protect A1 use.

### **2020/2021**

In 2020/2021 there were a total of four planning application involving HFTs. Out of these, one was permitted and three refused. The three that were refused met the threshold for Policy D.TC5. Policy D.TC5 was used to refuse all of them.

One was permitted as it did not meet the threshold for policy D.TC5. However, as the development was within 400m of a school it did meet the threshold for London Plan Policy E9. A condition has been added to the planning permission for the hot food takeaway to comply with the Healthy Catering Commitment within 3 months of opening. As of October 2024, this site is currently still under construction.

### **2021/2022**

There was a total of two planning applications involving HFTs in 2021/2022 of which both were refused. One was refused using Policy E9 of the London Plan and one was refused using Policy D.TC5.

### **2022/2023**

There was a total of two planning applications in 2022/2023 involving HFTs of which both were refused using Policy D.TC5.

### **2023/2024**

There was a total of five planning applications in 2023/2024 involving HFTs of which four were refused and for one a decision is yet to be made. Out of the four that were refused, two met the threshold for Policy D.TC5 and this policy was used to refused them both.

Even though the other two applications did not meet the threshold for Policy D.TC5 they both were located within 400m of an existing school. One was refused using London Plan Policy E9 and one was refused based on the proposal having adverse impacts on the amenities of neighbouring residents. Policy D.DH8 has been used to refuse.

A detailed breakdown of all planning applications reviewed as part of this paper can be found in Appendix B.

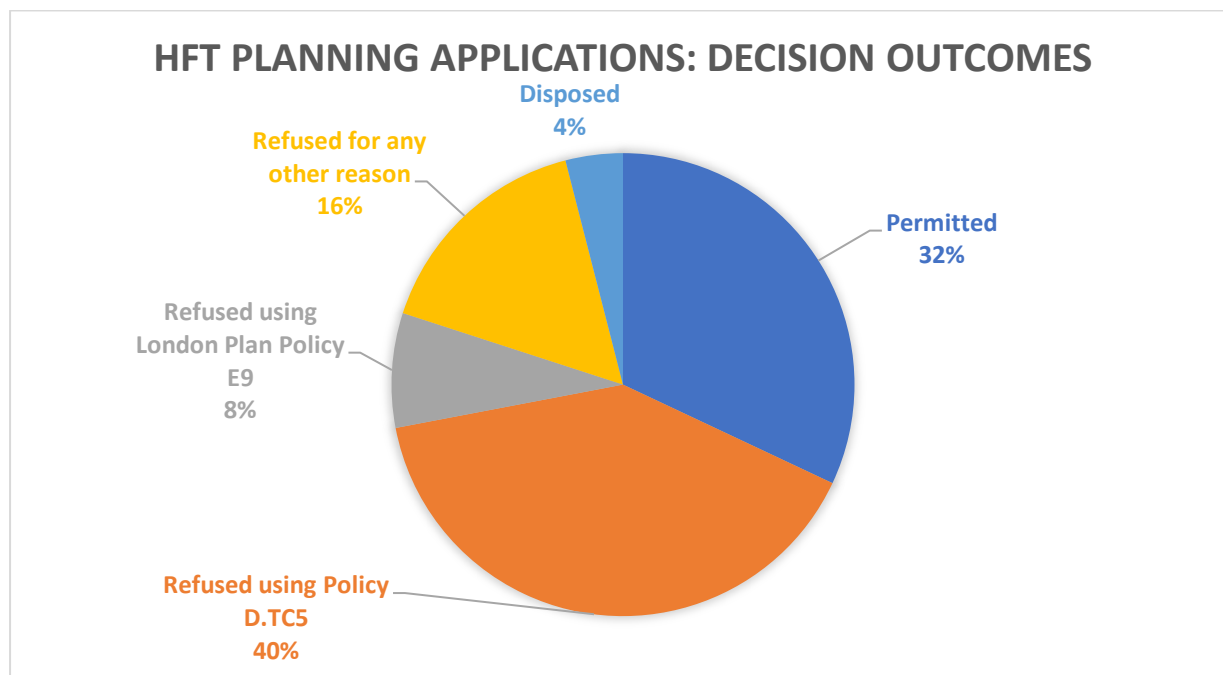
## **6. Learning from the HFT Policy Adoption**

### **Achievements**

Between 2019 and 2024 68% (17) of all (25) HFT planning applications were refused. Out of those, 58% (10) were refused using policy D.TC5. This demonstrates the policy's effectiveness in reducing fast food outlets and enhancing the food environment in Tower Hamlets, particularly around schools. This initiative contributes to protecting the health of children and young people in Tower Hamlets, ensuring they enter adulthood in good health. Additionally, 11% (2) of the refusals were based

on London Plan Policy E9, which prohibits the opening of fast-food outlets within 400 meters of primary or secondary schools. This underscores the success of implementing this policy alongside Policy D.TC5.(See Figure 5).

**Figure 5: Hot food takeaway Planning Applications decision outcomes: 2019 and 2024.** The pie chart shows five decision outcomes: permitted, refused using policy D.TC5, refused using London Plan Policy E9, refused for any other reason and disposed.



In 2016, Tower Hamlets residents participated in the ‘great weight debate’ that took place across London. The common themes that emerged from the ‘great weight debate’ were that residents want to lead healthy lifestyles, but they feel that their environment and the food that is available are working against them. Londoners were extremely concerned about the accessibility of fast food in particular. The tendency of fast-food outlets to cluster around schools and target school children emerged as a spontaneous concern of the workshops. Overall, there was strong support for limiting the operations of fast food outlets, and for encouraging the development of healthier alternatives. They felt that encouraging healthier food in these outlets, limiting when they can operate, and preventing additional outlets from operating would tackle the issue at its source. This highlights residents’ support of this policy.

## Challenges

Use-classes were updated in 2021, eliminating the use class A5. HFTs now sit under the use class ‘sui generis’. This needs to be taken into account when renewing policy D.TC5 of the Local Plan.

Restricting the opening of fast-food businesses for public health reasons presents the challenge of balancing support for local businesses and the local food economy with the need to protect public health. Addressing obesity requires more than just

planning interventions, as evidenced by the ongoing debates, trials, and implementation of these policies over the past 20 years, which highlights the complexity of developing effective child obesity policies. While research on the success of HFT protection zones enforced through planning policy are limited, increasing planning interventions by councils will likely generate more evidence on their efficacy and the relationship between fast food availability and childhood obesity.

## Opportunities

In Tower Hamlets, a whole systems approach promotes healthy weight levels by addressing socio-economic, cultural, and environmental factors through coordinated, long-term action.

Currently, the borough's priorities focus on Healthy Places, Healthy Settings and Healthy Services, with environmental-level actions like spatial planning and fast-food regulation falling under the Healthy Places initiative. This policy is key to creating a healthier living environment, particularly around schools, to protect the health of children and young people into adulthood.

Alongside restricting the opening of fast-food businesses, it is important to offer healthier alternatives. Tower Hamlets has the opportunity to support and incentivize businesses that provide these healthier options, encouraging their establishment over fast food outlets. One such initiative is the [Tower Hamlets Food For Health Awards Programme](#), which recognizes businesses that are making their menus healthier. The Healthy Catering Commitment is delivered in other boroughs. In comparison, the FFH scheme has been established for longer and is more comprehensive due to its multi-tiered approach.

Given that fast food outlets often offer affordable, unhealthy options to financially struggling residents for whom a healthier alternative may be unaffordable, the council is also supporting access to healthy, affordable food through services like fruit and vegetable vouchers, Healthy Start cards and food pantries providing fresh produce.

## 7. Conclusion

As observed through Public Health Outcomes Framework data, Tower Hamlets has rates of child obesity which are higher than in much of England and most other London boroughs at year 6. Furthermore, emerging epidemiological evidence suggests that many of our residents disproportionately suffer the ill effects of diet related diseases.<sup>liii</sup> Because of this, the Council, as a member of the borough's Health and Wellbeing Board, has developed a package of policies, strategies and programs designed to lead a transformation in addressing childhood healthy weight in the borough. The Local Plan ambition to define appropriate locations and concentrations for new takeaway premises through Policy D.TC5 is a major part of this package. It is also supported by the national and local evidence base. Policy D.TC5 in the updated Local Plan establishes a 400-meter protection zone, consistent with London Plan Policy E9. Tower Hamlets' local policy reinforces the significance of this regional policy in safeguarding the health and wellbeing of children and young people.

## Appendix A: Relevant Planning Policy Use Classes

### Sui Generis:

Sui Generis of the [Use Classes Order 1987](#) (as amended) are all other locations which do not fit into one of the other categories or classes, they are unique in themselves. 'Sui generis' is a Latin term that, in this context, means 'in a class of its own'.

Certain uses are specifically defined and excluded from classification by legislation, and therefore become 'sui generis'. These are:

- theatres
- amusement arcades/centres or funfairs
- launderettes
- fuel stations
- hiring, selling and/or displaying motor vehicles
- taxi businesses
- scrap yards, or a yard for the storage/distribution of minerals and/or the breaking of motor vehicles
- 'Alkali work' (any work registerable under the Alkali, etc. Works Regulation Act 1906 (as amended))
- hostels (providing no significant element of care)
- waste disposal installations for the incineration, chemical treatment or landfill of hazardous waste
- retail warehouse clubs
- nightclubs
- casinos
- betting offices/shops
- pay day loan shops
- public houses, wine bars, or drinking establishments – from 1 September 2020, previously Class A4
- drinking establishments with expanded food provision – from 1 September 2020, previously Class A4
- hot food takeaways (for the sale of hot food where consumption of that food is mostly undertaken off the premises) – from 1 September 2020, previously Class A5
- venues for live music performance – newly defined as 'Sui Generis' use from 1 September 2020

- cinemas – from 1 September 2020, previously Class D2(a)
- concert halls – from 1 September 2020, previously Class D2(b)
- bingo halls – from 1 September 2020, previously Class D2(c)
- dance halls – from 1 September 2020, previously Class D2(d)

**A5:**

A class A5 hot food takeaway is defined as an outlet whose primary business is ‘the sale of hot food for consumption off the premises’ (Planning Portal, 2014).

Characteristics of these takeaway food outlets include: hot food is ordered and paid for at the till, limited space for sitting in, and no waiter service (Lake et al., 2010).

The usage class has been appropriated by Councils, the Mayor of London and National Planning Guidance as a way to control the location of outlets likely to sell nutrient dense foods high in fats, salt and sugar, including: fried chicken, fish and chips, pizzas or kebab shops, Indian and Chinese takeaways. The class does not include cafes, full service restaurants, drinking establishments and shop

## Appendix B: HFT Policy Monitoring 2019 to 2024

Please see the below document for a detailed monitoring of Policy D.TC5.

2023/24:

Case Reference Number	Application Date	Application Address	Proposal	Decision Date	D.TC5a: Will this proposal lead to a separation of less than four non-A5 units between each new hot food takeaway unit?	D.TC5b: Will this proposal lead to a percentage of A5 units would exceed 5% of the total number of units within Major, District or Neighbourhood Centres.	D.TC5c: Will this proposal lead to there being more than one A5 unit within a Neighbourhood Parade?	D.TC5d: Is there a school within 200m?	London Plan Policy: Is there a school within 400m?	D.TC5e: Will the proposal harm surrounding amenities?	Decision	Impact	Rationale for decision	Has it met the threshold for HIA?	Spatial Planning and Health Manager consulted Yes/no	Spatial Planning and Health Manager consulted Yes/no
PA/23/00729/NC	4/18/2023	232 Whitechapel Road, London, E1 1BJ	Retrospective application for Change of Use of ground floor unit from E(b) Sale of food and drink to Take Away Restaurant (Sui Generis)	TBC												
PA/23/01950/NC	10/23/2023	2A Libra Road, London, E3 2HD	Retrospective planning permission for the change of use from a cafe (Use Class E(b)) into a falafel	12/8/2023	No.	Not specified.	N/A.	Yes.	Yes.	Yes.	Refused.	Positive. Retrospection application refused.	By virtue of the site's proximity to the surrounding primary and secondary schools, the application fails to comply with policies E9 of the London Plan (2021) and D.TC5 of the Local Plan (2020).			

Hot Food Takeaway Policy Review

			bar/takeaway (Sui Generis). Installation of a small extractor fan.														
PA/23/021 26/NC	11/21/20 23	111A Commercial Road, London, E1 1RD	Retrospective planning application for change of use from a cafe/coffee shop (Use Class E(b)) to a takeaway (Sui Generis).	1/15/2024	No.	N/A	N/A.	Yes.	Yes.	Not specified.	Refused.	Positive. Retrospection application refused.	The proposal is within 200 metres from the entrance or exit of existing primary and secondary schools, contrary to Local Plan policy D.TC5 ( Food, drink, entertainment and the night-time economy) and London Plan policy E9 (Retail, markets and hot food takeaways).				
PA/24/002 21/NC	2/12/2024	71-73 Commercial Street, London, E1 6BD	Amalgamation and change of use from Class E to Class E / Sui Generis 'Restaurant /Takeaway' together with associated shopfront works	4/4/2024	No.	No.	No.	No.	Yes.	No.	Refused.	Positive. No new HFT.	Whilst it is acknowledged that the proposal meets the Local Plan criteria for hot food takeaways the proposal fundamentally fails to meet the principles set out within Policy E9 of the London Plan (2021) which supersedes the Local Plan policy. Policy E9 which states that food takeaways should be at least 400 meters away from an existing or proposed primary or secondary school. Therefore, the proposal is unacceptable in terms of land use.				
PA/24/004 97/NC	3/21/2024	38 Ben Jonson Road, London, E1 3NN	Retrospective application for change of use from class E(a) Sandwich Shop to café and	5/1/2024	Not specified.	Not specified.	Not specified.	No.	Yes.	not specified.	Refused.	Positive. Retrospection application refused.	The proposal has an adverse impact on the amenities of the neighbouring residents' contrary to Local Plan policy D.DH8 (Amenity).				



Hot Food Takeaway Policy Review

			fast-food takeaway class Sui Generis and in stallation of an extractor flue.																
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2022-23:

02/12/2024

Hot Food Takeaway Policy Review

Case Reference Number	Application Type	Application Date	Application Address	Proposal	Decision Date	D.TC5a: Will this proposal lead to a separation of less than four non-A5 units between each new hot food takeaway unit?	D.TC5b: Will this proposal lead to the percentage of A5 units would to exceed 5% of the total number of units within Major, District or Neighbourhood Centres.	D.TC5c: Will this proposal lead to there being more than one A5 unit within a Neighbourhood Parade?	Is there a school within 200m?	Is there a school within 400m.	D.TC5e: Will the proposal harm surrounding amenities?	Decision	Impact	Rationale for decision	Has it met the threshold for HIA?	Spatial Planning and Health Management consulted yes/no
PA/22/00125/NC	Change of Use	5/25/2022	73 Wentworth Street, London, E1 7TD	Retrospective application for subdivision of existing property into two units, use of ground floor as restaurant and takeaway (Class E), use of basement as takeaway (Sui Generis). Works to shop front to install two new doors and retention of existing extraction system.	7/25/2022	Yes.	Not specified.	Yes possibly.	Yes.	Yes.	Yes.	Refused.	Positive. No new HFT.	Introduction of an overconcentration of takeaway uses on site for which there is insufficient justification and potential harm to neighbouring amenity contrary to TH policy D.TC5 and LP policy E9.		

Hot Food Takeaway Policy Review

PA/22/01664/NC	Retrospective Application	10/28/2022	235 Mile End Road, London, E1 4AA	Retrospective application for hot-food takeaway (Sui generis) and restaurant (Class E(b)).	2/10/2023	Yes.	Not specified.	Yes.	Yes.	Yes.	Not specified.	Refused.	Positive. Retrospective application refused.	The proposed change of use would contravene Policy D.TC5, specifically in relation to the over proliferation of hot food takeaways at this location and its proximity to schools.	Yes.	Yes.
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Hot Food Takeaway Policy Review  
2021-22:

Case Reference	Application Type	Application Date	Application Address	Proposal	Decision Date	D.TC5a: Will this proposal lead to a separation of less than four non-A5 units between each new hot food takeaway unit?	D.TC5b: Will this proposal lead to the percentage of A5 units to exceed 5% of the total number of units within Major, District or Neighbourhood Centres.	D.TC5c: Will this proposal lead to there being more than one A5 unit within a Neighbourhood Parade?	School within 200m?	School within 400m?	D.TC5e: Will the proposal harm surrounding amenities?	Decision	Impact	Rationale for decision	Has it met the threshold for HIA?	Spatial Planning and Health Manager consulted Yes/no
PA/21/00771/NC	Change of Use	6/7/2021	324A Hackney Road, London, E2 7AX	Application for proposed change of use from an electrical shop (use class A1) to hot food takeaway (use class A5) and installation of flue to rear elevation.	7/30/2021	No.	No.	No.	No.	Yes.	Not specified	Refused.	Positive. No new HFT.	Despite being a parade of shops, this area is not designated as a neighbourhood parade in the plan. Also, the latest London plan policy E9 states that it does not allow A5 uses within a 400m walking distance of a school and the site is 350m from the nearest entrance to Columbia Primary School (using Google Maps). The proposal is not supported in policy terms and is unacceptable in this regard. The proposed change of use would not comply with the policy in terms of loss of retail space. The flue would also be unacceptable in design and heritage terms. It has not provided sufficient details to address the waste and servicing	Yes.	N/A

Hot Food Takeaway Policy Review

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issue. Therefore, the application should be recommended for refusal.

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Hot Food Takeaway Policy Review

PA/21/02705/NC	Change of Use	12/31/2021	8 Hackney Road, London, E2 7NS	Proposed change of use from coffee shop and bakery (Class E) to hot food takeaway (Sui Generis) and installation of a mechanical extraction and ventilation unit.	9/5/2022	Not specified.	Not applicable.	Not applicable.	No.	Yes.	Not specified.	Refused.	Positive. No new HFT.	Policy D.TC5 of the Tower Hamlets Local Plan (2020) states that hot food takeaways will only be supported within the Central Activities Zone, Tower Hamlets Activity Areas, Canary Wharf Major Centre, Secondary Frontages of District Centres, Neighbourhood Centres or Neighbourhood Parades. While the subject unit is adjacent to other shops, this area is not designated as a Neighbourhood Parade in the local plan and as such the proposed use is unacceptable in principle. In addition, London Plan Policy E9 states that 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. The site would sit approximately 350 metres walking distance from Virginia Primary	Yes.	N/A
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Hot Food Takeaway Policy Review

														School as per Google Maps. This also renders the proposal unacceptable in principle		
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Hot Food Takeaway Policy Review  
2020-21:

Case Reference Number	Type of Application	Application Date	Application Address	Ward	Proposal	Decision Date	D.TC5a: Will this proposal lead to a separation of less than four non-A5 units between each new hot food takeaway unit?	D.TC5b: Will this proposal lead to the percentage of A5 units would to exceed 5% of the total number of units within Major, District or Neighbourhood Centres.	D.TC5c: Will this proposal lead to there being more than one A5 unit within a Neighbourhood Parade?	D.TC5d : School within 200m?	London Plan Policy: School within 400m?	D.TC5e : Will the proposal harm surrounding amenities?	Decision	Impact	Rationale for decision	Has it met the threshold for HIA?	Spatial Planning and Health Manager consulted yes/no
PA/18/03587/NC	Change of Use	1/25/2019	504 Roman Road, London, E3 5LU	Bow West	Change of use from shop (A1) to restaurant (Class A3) and hot food takeaway (Class A5).	3/19/2019	Not specified.	Yes	Not specified.	Yes.	Yes	No	Refused	Positive Impact. No new hot food takeaway.	<b>Refused to protect A1 use</b> and due to the close <b>proximity to the existing primary school</b> which is not in accordance with Local Plan Policy DM1 of the Managing Development Document (2013)	N/A (before HIA policy)	N/A (before HIA policy)
PA/19/00255/NC	Change of Use	3/22/2019	26 Wentworth Street, London, E1 7TF	Spitalfields and Banglatown	Proposed change of use from A1 use class (Textile shop) to A3/A5 mixed use (Restaurant/Hot food takeaway) at basement and ground floor level, with a new front facade and new duct.	5/17/2019	No.	No	No.	No.	No	No.	Permitted	Negative Impact. New Hot Food Takeaway.	<b>The change of use will not result in an overconcentration of A3/A5 uses within the vicinity of the application site.</b> Officer site inspection showed only one A3 Café use and no A5 use operating on Wentworth street between Middlesex Street and Bell Lane.	N/A (before HIA policy)	N/A (before HIA policy)
PA/18/03586/NC	Change of Use	5/8/2019	19 Pepper Street, London, E14 9RP		Change of use from Offices (B1) to Restaurants & Hot food takeaway (A3/A5).	TBC				No.	No.						

Hot Food Takeaway Policy Review

PA/19/01213/NC	Change of Use	6/11/2019	504 Roman Road, London, E3 5LU	Bow West	Retention of change of use from shop (A1) to restaurant (Class A3) and hot food takeaway (Class A5) and installation of new extractor flue. Temporary use for 2 year period.	10/9/2020	Yes.	Yes	Yes.	Yes.	Yes.	No.	Permitted	Negative. New Hot Food Takeaway.	Policy D.TC5 seeks to ensure that A5 use will be supported under predefined conditions. Part three of the policy sets out these conditions. Based on this the section, the principal of the development is unacceptable. However, <b>material consideration dictates that as this development is already in motion. I must assess the current harm as a result of this use against this policy. The material consideration of the current pandemic due to COVID 19, the Council can support the short-term loss of the A1 use for two years help sustain this viable business in the borough.</b> Temporary permission will protect and prevent a permanent loss of A1 use on Roman Road East district centre. As such, the proposal accords with policy D.TC5 of the Local Plan 2031.	N/A (before HIA policy)	N/A (before HIA policy)
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Hot Food Takeaway Policy Review

PA/19/01382/R	Change of Use	6/28/2019	504 Commercial Road, London, E1 0HY	Shadwell	Change of use of ground floor shop from (A1) retail to (A5) hot food takeaway and installation of cooking extract duct on flat roof of building.	8/21/2019	Not specified.	Not specified.	Not specified.	No.	Yes.	Not specified.	Refused	Positive. No New Hot Takeaway.	<b>A1 use should be protected</b> unless the site has been vacant for 12 months or more. This condition has not been fulfilled here.	N/A (before HIA policy)	N/A (before HIA policy)
PA/19/01754/R	Change of Use	8/14/2019	811 Commercial Road, London, E14 7HG	Mile End	Proposed change of use from Shop (A1) to hot food takeaway (A5), installation of extractor flue at side elevation and minor internal reconfiguration works.	10/9/2019	Not specified.	Not specified.	Yes.	No.	No	Yes.	Refused	Positive. No New Hot Takeaway.	<b>Refused based on heritage grounds</b> not policy D.TC5.	N/A (before HIA policy)	N/A (before HIA policy)
PA/19/01777/NC	Listed Building consents (alter/extend)	8/14/2019	811 Commercial Road, London, E14 7HG	Mile End	Proposed change of use from Shop (A1) to hot food takeaway (A5), installation of extractor flue at side elevation and minor internal reconfiguration works.	10/9/2019	Not specified.	Not specified.	Yes.	No.	Yes.	Yes.	Refused	Positive. No New Hot Takeaway.	<b>Refused based on heritage grounds</b> not policy D.TC5.	N/A (before HIA policy)	N/A (before HIA policy)

Hot Food Takeaway Policy Review

PA/19/02140/NC	Change of Use	12/18/2019	2 Commercial Street, London, E1 6LP	Spitalfields and Banglatown	Retrospective change of use Shops (Class A1) to Hot food takeaways (Class A5).	4/7/2020	No	No.	No.	No	Yes.	No.	Permitted	Neutral - Baguette and Salad Bar.	Policy D.TC5 1 a supports the provision of cafés, restaurants and drinking establishments in the CAZ where they will enhance the “overall vitality and viability” of the town centre. D.TC5 3 a requires a separation of at least four non-A5 units, which is the case here. The premises is the only A5 use in its shopping parade (D.TC5 3 c) and there are no other A5 uses on the same stretch of street.	Yes, BUT see officer's report: no food prepared on site, early closing hours, limited proximity to schools	No
PA/19/02834/NC	Other minor development	12/20/2019	Site At Kiosk 5, Reuters Plaza, London, E14 5AJ	Canary Wharf	Erection of a kiosk for A1, A3, A4, or A5 use	2/14/2020	Not specified.	Not specified.	Not specified.	No.	No.	No.	Permitted	Negative. New hot food takeaway.	The proposal would assist maintain and improve the vitality and vibrancy of retail offer at Canary Wharf in accordance with policy S.TC1. Design, amenity and waste all fine too.	yes, A5 use - no HIA submitted	no
PA/19/02394/NC	Change of Use	12/31/2019	47 Brick Lane, London, E1 6PU	Spitalfields and Banglatown	Change of use of ground floor and basement from Use Class A1 (retail) to Use Class A3 (restaurant) and Class A5 (Takeaway)	5/5/2020	Not specified.	Yes.	Not specified.	Yes.	Yes	Yes.	Refused	Positive. No New Hot Takeaway.	As required by policy, a Health Impact Assessment is required for this type of application given it's intended use and proximity to a school. This information has not been provided and is contrary to policy D.SG3 of the Local Plan (2020). The loss of A1 use	Yes, no HIA submitted	No



2019-2020:

Case Reference Number	Application Type	Application Date	Application Address	Ward	Proposal	Decision Date	D.TC5a: Will this proposal lead to a separation of less than four non-A5 units between each new hot food takeaway unit?	D.TC5b: Will this proposal lead to the percentage of A5 units would exceed 5% of the total number of units within Major, District or Neighbourhood Centres.	D.TC5c: Will this proposal lead to there being more than one A5 unit within a Neighbourhood Parade?	D.TC5d: School within 200m?	London Plan Policy Y: School within 400m?	D.TC5e: Will the proposal harm surrounding amenities?	Decision	Impact	Rationale for decision	Has it met the threshold for HIA?	Spatial Planning and Health Manager consulted yes/no
PA/18/03587/NC	Change of Use	1/25/2019	504 Roman Road, London, E3 5LU	Bow West	Change of use from shop (A1) to restaurant (Class A3) and hot food takeaway (Class A5).	3/19/2019	Not specified.	Yes	Not specified.	Yes.	Yes	No	Refused	Positive Impact. No new hot food takeaway.	<b>Refused to protect A1 use</b> and due to the close <b>proximity to the existing primary school</b> which is not in accordance with Local Plan Policy DM1 of the Managing Development Document (2013)	N/A (before HIA policy)	N/A (before HIA policy)
PA/19/00255/NC	Change of Use	3/22/2019	26 Wentworth Street, London, E1 7TF	Spitalfields and Banglatown	Proposed change of use from A1 use class (Textile shop) to A3/A5 mixed use (Restaurant/Hot food takeaway) at basement and ground floor level, with a new front facade and new duct.	5/17/2019	No.	No	No.	No.	No	No.	Permitted	Negative Impact. New Hot Food Takeaway.	<b>The change of use will not result in an overconcentration of A3/A5 uses within the vicinity of the application site.</b> Officer site inspection showed only one A3 Café use and no A5 use operating on Wentworth street between Middlesex Street and Bell Lane.	N/A (before HIA policy)	N/A (before HIA policy)

Hot Food Takeaway Policy Review

PA/18/03586/NC	Change of Use	5/8/2019	19 Pepper Street, London, E14 9RP		Change of use from Offices (B1) to Restaurants & Hot food takeaway (A3/A5).	TBC				No.	No.						
PA/19/01213/NC	Change of Use	6/11/2019	504 Roman Road, London, E3 5LU	Bow West	Retention of change of use from shop (A1) to restaurant (Class A3) and hot food takeaway (Class A5) and installation of new extractor flue. Temporary use for 2 year period.	10/9/2020	Yes.	Yes	Yes.	Yes.	Yes.	No.	Permitted	Negative. New Hot Food Takeaway.	Policy D.TC5 seeks to ensure that A5 use will be supported under predefined conditions. Part three of the policy sets out these conditions. Based on this the principal of the development is unacceptable. However, <b>material consideration dictates that as this development is already in motion. I must assess the current harm as a result of this use against this policy. The material consideration of the current pandemic due to COVID 19, the Council can support the short-term loss of the A1 use for two years help sustain this viable business in the borough.</b> Temporary	N/A (before HIA policy)	N/A (before HIA policy)

Hot Food Takeaway Policy Review

																permission will protect and prevent a permanent loss of A1 use on Roman Road East district centre. As such, the proposal accords with policy D.TC5 of the Local Plan 2031.		
PA/19/01382/R	Change of Use	6/28/2019	504 Commercial Road, London, E1 0HY	Shadwell	Change of use of ground floor shop from (A1) retail to (A5) hot food takeaway and installation of cooking extract duct on flat roof of building.	8/21/2019	Not specified.	Not specified.	Not specified.	No.	Yes.	Not specified.	Refused	Positive. No New Hot Takeaway.	<b>A1 use should be protected</b> unless the site has been vacant for 12 months or more. This condition has not been fulfilled here.	N/A (before HIA policy)	N/A (before HIA policy)	
PA/19/01754/R	Change of Use	8/14/2019	811 Commercial Road, London, E14 7HG	Mile End	Proposed change of use from Shop (A1) to hot food takeaway (A5), installation of extractor flue at side elevation and minor internal	10/9/2019	Not specified.	Not specified.	Yes.	No.	No	Yes.	Refused	Positive. No New Hot Takeaway.	<b>Refused based on heritage grounds</b> not policy D.TC5.	N/A (before HIA policy)	N/A (before HIA policy)	



Hot Food Takeaway Policy Review

					reconfigurati on works.												
PA/19/ 01777/ NC	Listed Building consents (alter/ext end)	8/14/201 9	811 Commerc ial Road, London, E14 7HG	Mile End	Proposed change of use from Shop (A1) to hot food takeaway (A5), installation of extractor flue at side elevation and minor internal reconfigurati on works.	10/9/201 9	Not specified.	Not specified.	Yes.	No.	Yes.	Yes.	Refused	Positive. No New Hot Takeaway.	<b>Refused based on heritage grounds</b> not policy D.TC5.	N/A (befo re HIA polic y)	N/A (before HIA polic y)
PA/19/ 02140/ NC	Change of Use	12/18/20 19	2 Commerc ial Street, London, E1 6LP	Spitalfi elds and Banglat own	Retrospective change of use Shops (Class A1) to Hot food takeaways (Class A5).	4/7/2020	No	No.	No.	No	Yes.	No.	Permitted	Neutral - Baguette and Salad Bar.	Policy D.TC5 1 a supports the provision of cafés, restaurants and drinking establishments in the CAZ where they will enhance the “overall vitality and viability” of the town centre. D.TC5 3 a requires a separation of at least four non-A5 units, which is the case here. The premises is the only A5 use in its shopping parade (D.TC5 3 c) and there are no other A5 uses on the same stretch of street.	Yes, BUT see offic er's repor t: no food prep ared on site, early closi ng hour s, limit ed proxi mity to scho ols	No

Hot Food Takeaway Policy Review

PA/19/02834/NC	Other minor development	12/20/2019	Site At Kiosk 5, Reuters Plaza, London, E14 5AJ	Canary Wharf	Erection of a kiosk for A1, A3, A4, or A5 use	2/14/2020	Not specified.	Not specified.	Not specified.	No.	No.	No.	Permitted	Negative. New hot food takeaway.	The proposal would assist maintain and improve the vitality and vibrancy of retail offer at Canary Wharf in accordance with policy S.TC1. Design, amenity and waste all fine too.	yes, A5 use - no HIA submitted	no
PA/19/02394/NC	Change of Use	12/31/2019	47 Brick Lane, London, E1 6PU	Spitalfields and Banglatown	Change of use of ground floor and basement from Use Class A1 (retail) to Use Class A3 (restaurant) and Class A5 (Takeaway)	5/5/2020	Not specified.	Yes.	Not specified.	Yes.	Yes	Yes.	Refused	Positive. No New Hot Takeaway.	As required by policy, a Health Impact Assessment is required for this type of application given it's intended use and proximity to a school. This information has not been provided and is contrary to policy D.SG3 of the Local Plan (2020). The loss of A1 use and the introduction of A5 use is not supported due to the <b>protection of A1 uses</b> and also its <b>proximity to a local school</b> . As such, the proposal is not accordant with local plan policy D.TC2 and D.TCS.	Yes, no HIA submitted	No

Hot Food Takeaway Policy Review

PA/20/00024/A1	Other minor development	1/6/2020	509-515b Roman Road, London, E3 5EL	Bow East	Demolition of existing single storey building at nos. 509 and 511 Roman Road and erection of a replacement basement and three-storey extension with ground floor A3/A5 use.	3/2/2020	Not specified.	Not specified.	Not specified.	Yes.	Yes.	Yes.	Refused	Positive. No New Hot Takeaway.	<b>The relocation of the A5 use class has not been adequately justified in terms of amenity impacts and is not supported.</b> The external works would neither preserve nor enhance the conservation area or surrounds with.	yes - A5 element - no HIA submitted	Spatial Planning and Health Manager not consulted amenity impact not addressed by applicants, D.TC5 can apply to refuse
PA/20/00258/NC	Other minor development	2/12/2020	120 Crisp Street, London, E14 6NL	Lansbury	Proposed internal additional floor for Restaurant (A3) / Hot food takeaways (A5) use.	4/8/2020	N/A - Previous permission granted.	N/A - Previous permission granted.	N/A - Previous Permission granted.	Yes.	Yes.	N/A - Previous Permission granted.	Permitted	Neutral. Does not increase A5 capacity.	Whilst the applicant has initially sought the additional floorspace in relation to the hot food takeaway use, it was confirmed that the additional floorspace would be for the restaurant's purposes and that the ground floor serves as restaurant seating area and hot food takeaway waiting area.	yes A5 use	no

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