



Hot Food Takeaway Supplementary Planning Document

Coventry City Council

August 2019

Hot Food Takeaway Supplementary Planning Document (HFT SPD)

1. Purpose of this SPD

The Council recognises the role that hot food takeaways play in the economy. They provide a service to local people and add vitality and interest to defined centres, but planning applications for hot food takeaways, particularly those in close proximity to residential properties, frequently generate a significant number of objections. If successful, these premises can also have a negative impact on the health and wellbeing of those in Coventry. It is therefore important that there are appropriate requirements in place to allow new hot food takeaways to provide a service to local people, but without having a negative impact on the health and wellbeing of those in the area.

This SPD is a material consideration in the determination of a planning application and provides information and appropriate guidance to those involved in planning applications covering hot food takeaways. It is aimed at individuals and organisations involved in preparing and submitting a planning application as well as those involved in the determination and enforcement of planning applications.

The SPD covers all applications that include an element of hot food takeaway (A5 use class) regardless of their size and nature. This includes applications for new build and changes of use to a hot food takeaway, as well as all forms of mixed use facilities (containing an element of A5 use).

In relation to mixed use schemes in particular it is not uncommon for the non A5 element of a scheme to diminish over time to the detriment of the centre as a whole. Therefore mixed use applications, which contain an element of A5 use will be considered through this SPD in the same way as a singular A5 use. In such circumstances this may also generate the need for specific planning conditions to be attached to a decision which manage the level of A5 floor area or operating hours etc.

This SPD provides details of some relevant planning policies, guidance on how to meet Policy R6 (2(c)) and details of some non-planning related considerations that an applicant may wish to consider, with useful contact details.

2. Classification of Hot Food Takeaways

In planning terms, there is a distinction between a shop (use class A1), a restaurant or café (use class A3), a drinking establishment (use class A4) and a hot food take away (use class A5). For the avoidance of doubt an A5 use is where food is prepared, cooked and sold within the premises but to be consumed away from it. This can include Kebab shops, fish and chip shops or pizza places for example.

3. Local Planning Policy

3.1 The Coventry Local Plan

This SPD has been developed to support The Coventry Local Plan, adopted in December 2017.

The main relevant policy within this Local Plan is Policy R6: Restaurants, Bars and Hot Food Takeaways.

Policy R6: Restaurants, Bars and Hot Food Takeaways

1. Outlets should be located within defined centres and will normally be discouraged outside those locations.
2. Proposals within defined centres will be permitted provided they:
 - a) Would not result in significant harm to the amenity of nearby residents or highway safety;
 - b) Would not result in harmful cumulative impacts due to existence of any existing or consented proposed outlet;
 - c) Are in accordance with the emerging Hot Food Takeaway Supplementary Planning Document (in particular, for A5 uses); and
 - d) Are compatible with other Plan Policies.

Policy R6 in the Local Plan is accompanied by the following text:

“The Council has pledged to improve its population’s health and wellbeing and to reduce health inequalities. One of the challenges the Council faces in promoting healthy eating is the availability of foods high in fat, salt and sugar in local neighbourhoods, including the prevalence of hot food takeaways in some areas.

Such uses do however have the potential to cause significant problems which impact upon residential amenity, highways and parking. Hot food takeaways often attract considerable customer numbers and are regularly associated with issues such as litter, waste disposal, noise, odour, traffic and health. For a combination of these reasons, they will normally only be supported within defined centres where residential amenity is less likely to be an issue and will be resisted elsewhere. Where homes are situated above such premises, specific care will need to be given to odour extraction, noise insulation and general public convenience. Where appropriate provisions cannot be included then such uses will not be supported, even within designated centres.”

The defined centres referred to in Policy R6 (and throughout this document) will be as per the Policies Map accompanying the Coventry Local Plan¹ and include the City Centre, Major District Centres, District Centres and Local Centres.

3.2 The Coventry City Centre Area Action Plan

The Coventry City Centre Area Action Plan has been developed to help guide, inform and consider development proposals within Coventry City Centre and was adopted in December 2017. Particular policies to consider for Hot Food Takeaway applications include:

¹ http://www.coventry.gov.uk/info/110/planning_applications/1333/online_planning_map/2

Policy CC15

b) Far Gosford Street will be regarded as a local centre meaning proposals for local shopping provisions will be supported. This will however exclude the provision of any further hot food takeaways (use class A5), which will not be permitted.

Policy CC17

b) Spon Street will be encouraged as a suitable and attractive location for specialist and independent retailers. In order to protect the availability of property for such use, further hot food takeaways (use class A5), which will not be permitted within this Area.

Policy CC22: Primary and Secondary Frontages

a) Primary Frontages, shown in appendix 1, are expected to include a high proportion of retail uses which may include food, drink, clothing and household goods. A clear majority of A1 retail uses should remain within all Primary Frontages at all times. Where proposals would result in less than 60% of primary frontages being classed as A1 retail then the applicant will be expected to demonstrate exceptional circumstance to justify change of use. Under no circumstances though will A1 retail be allowed to fall below 51% of primary frontages. Class A5 and sui-generis uses will only be permitted in exceptional circumstances.

If a hot food takeaway application does not comply with the relevant policies in the Coventry Local Plan and City Centre Area Action Plan, the Council may request additional information or require amendments to the application. If the issues remain, planning permission will not normally be granted.

4. Requirements for Hot Food Takeaway Applications

All applications for A5 premises must contain information to demonstrate that they meet the following requirements 4.1 – 4.7 (below). Failure to do so may ultimately result in a refusal of planning permission

4.1 Concentration of Hot Food Takeaways

Coventry Local Plan Policy R6, referred to in section 1.1, refers to harmful cumulative impacts of hot food takeaways. It is acknowledged that hot food takeaways offer a popular service to local communities and have a role to play within town centres and other shopping areas. However, where groups of hot food takeaway uses develop, so can harmful cumulative impacts

such as displacement of other retail shops, breaking up the continuity of the retail frontage and, in defined centres, an overabundance can undermine the primary retailing function of these areas and/or result in a loss of shops to the detriment of local residents. Additional harmful cumulative impacts include increased numbers of customers around hot food takeaways (including at less sociable hours), which can lead to problems in disturbance, increased noise, littering, crime and anti- social behavior.

To encourage balanced and diverse shopping areas and to help reduce these harmful additional impacts, the concentration of hot food takeaways will be considered.

Concentration of Hot Food Takeaways: In areas that have become over concentrated by hot food takeaways, further hot food takeaway applications will not be permitted

Please note that this requirement will not apply to applications within Coventry City Centre (for the purposes of hot food takeaway applications, this will be classified as the area marked in the Coventry City Centre Area Action Plan City Centre Boundary in figure 1²).

In areas that have become over concentrated with hot food takeaways (with the exception of Coventry City Centre), further hot food takeaway applications will not be granted. An area will be classed as over concentrated with hot food takeaways if the proposed address falls into a Lower Super Output Area (LSOA) where the number of takeaways per one thousand population exceeds the average for England as per the most up to date data on the FEAT tool (<https://www.feat-tool.org.uk/feat2/>). Further information and mapping is available on the Planning pages of the Council's website³. The current average number of takeaways per one thousand population in England is shown in Appendix A section 1.5, along with a table showing the current number of takeaways per one thousand population at each defined centre.

Failure to meet this threshold will mean the application is unlikely to be approved.

More information on the concentration of hot food takeaways can be found in Appendix A.

Applications must demonstrate how they meet the policies above (Policy R6 from the Local Plan and Policies CC15, CC17 and CC22 from the City Centre Area Action Plan, see sections 3.1 and 3.2) in the application. Failure to do so may ultimately result in a refusal of planning permission.

4.2 Proximity to schools

Obesity, and the long term consequences of obesity, is a growing problem with a significant burden on health and society in England and Coventry. Appendix A includes the evidence supporting an intervention limiting new hot food takeaways in close proximity to schools.

² <http://www.coventry.gov.uk>

³ <http://www.coventry.gov.uk>

The Council understands that obesity is a complex problem and as such there is no single solution. The need for action at all levels of government and society has been recognised. This measure is one of many initiatives being worked on by the Council and its partners. This whole systems, coordinated approach can help to reduce the obesity crisis in Coventry.

Proximity to Schools: Hot food takeaway applications will not be approved if the hot food takeaway falls within a 5 minute walk from the gate(s) of any primary or secondary school (including any Special School, Sixth Form College and Academy), within or outside Local Education Authority Control.

To avoid any ambiguity with street geography increasing or decreasing the length of time to walk a distance, the Council have developed a map identifying the 5 minute walk boundaries around school gates. A sample of this map for illustration purposes and details on how it was created can be found in Appendix B.

A more detailed, interactive map showing the exclusion zones around schools (including special schools, colleges and academies) is available on the Councils local plan webpages⁴. This map is to be used by potential applicants and those involved in the determination of planning applications to ascertain whether a premises falls within an exclusion zone.

If the majority of the hot food takeaway falls within a zone, planning permission is unlikely to be granted.

Further information on the reasoning for a 5 minute walk as an exclusion zone is shown in Appendix A.

Failure to do so may ultimately result in a refusal of planning permission.

This requirement will not apply to hot food takeaway proposals that fall within a defined centre in addition to falling into the 5 minute walk zone. However, if this situation does arise, provision must be made to minimise the negative impact on health and wellbeing. This may include conditions being applied relating to the opening hours of the hot food takeaway (see requirement 4.6). If provision is not made, the application may be delayed as the Council may request extra information, amendments or conditions to the application and if the issues are not resolved, planning permission will not normally be granted. The supporting maps to this SPD show further detail of the areas where defined centres and 5 minute walk zones around schools overlap⁵.

This will ensure that requirement 4.2 “Proximity to Schools” aligns with Local Plan policy R6 (Restaurants, Bars and Hot food Takeaways – see section 3.1) around normally permitting hot food takeaways in defined centres, provided they meet a variety of criteria and also complies with Local Plan policy DS3 (Sustainable Development Policy):

⁴ <http://www.coventry.gov.uk>

⁵ <http://www.coventry.gov.uk>

Policy DS3: Sustainable Development Policy

- 1) When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants to find solutions to enable proposals to be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area, including:
 - e) increased health, wellbeing and quality of life

4.3 Litter and Waste Disposal

Litter is unsightly and causes considerable annoyance to residents and adjoining businesses and can attract vermin and harm the environment. Hot food takeaways are often associated with the generation of litter, which can be discarded both in the immediate vicinity and further afield. Objectors to hot food takeaway applications often cite litter as a nuisance. Although the proprietor of the hot food takeaway business has little control over where its customers drop their litter, they can act to significantly reduce the potential of its occurrence by providing litterbins within their premises and this will contribute toward protecting residents by supporting 2a in Policy R6 (“Proposals within defined centres will be permitted provided they would not result in significant harm to the amenity of nearby residents or highway safety”).

Due consideration must be given to relevant policies in the Coventry Local Plan (such as policy EM8: Waste Management).

Policy EM8: Waste Management

- 1) The Council’s Waste Management Strategy will be supported through:
 - a) Encouraging less consumption of raw materials through the reduction and re-use of waste products;
 - b) A requirement for development proposals to incorporate adequate storage for waste and recycling services along with safe access for collection vehicles;
- 4) Development proposals should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings and promote more sustainable approaches to waste management, including the reuse and recycling of construction waste and the promotion of layouts and designs that provide adequate space to facilitate waste storage, reuse, recycling and composting

If the planning application does not include evidence that adequate space to facilitate appropriate waste storage, refuse, recycling and composting has been provided for the proposal, extra information, amendments or conditions may be requested. If the issues remain,

planning permission will not normally be granted.

The bins to be provided must be a suitable size and should be stored in a location so as not to cause a nuisance to neighbouring residential or commercial properties, including with regard to odours and accessibility. Where possible, the bins should be located where they are out of hot summer sunshine, be screened and be emptied and cleaned regularly. This will contribute toward preventing odours and flies. The bin stores should also be appropriately located for clear convenient access for refuse collection services and be accessible at all times to those working at the hot food takeaway. In addition to these points, commercial bin stores must be contained within the site. Where this is not possible, secure storage structures should be provided.

The applicant also needs to ensure that listed building consent and planning requirements in a conservation area are considered when developing the storage facilities for waste (see section 4.7).

Suitable grease traps must be installed on all drains for hot food takeaway shops to prevent blockages and the flooding of properties.

Conditions to ensure that litter and waste requirements are met may be applied.

4.4 Odour Extraction

Many hot food takeaways produce odours during opening times. In the majority of cases, consideration to the impact of odours is key when submitting a hot food takeaway planning application, however it is worth noting that some types of food preparation and cooking practices will produce more odours than others and therefore may require a higher specification and control to remove the odour, grease and smoke particles.

Odour Extraction: Extraction systems should be installed to effectively disperse odours from hot food takeaways, whilst satisfying the councils design policies

If unacceptable smells and fumes cannot be prevented by means of an effective extraction or abatement system, or if ducting cannot be installed without significant detriment to visual or residential amenity, planning permission will not normally be granted.

To be deemed acceptable, the proposed extraction system will need to:

- Have a flue that terminates at least 1 metre above the ridge height of the building to which it is attached, taking into consideration the height of neighbouring buildings
- Incorporate suitable odour treatment systems such as carbon or ozone (the use of odour neutralizing systems is discouraged)
- Include effective grease filtration in the canopy and, where carbon filtration systems are used, fine grease filters will normally be required
- Have route ducting so as to avoid proximity to residential or office windows on neighbouring properties (it is worth noting that this route ducting can only be run up walls that the applicant owns, where an external flue is proposed on a property in joint ownership or involving a wall owned by a third party, legal consent of all parties must

- be demonstrated)
- Incorporate flue terminals that do not impede discharge; i.e. china man's hats
 - Have a minimal number of bends in the ducting
 - Use ducting with a smooth internal surface
 - Maximise dispersion by being capable of achieving a ventilation rate of 30 air changes per hour for kitchen areas
 - Have an efflux velocity of at least 15m/s, dependent on stack height and odour treatment system
 - Use circular duct cross sections whenever possible
 - Fit all ductwork with anti-vibration couplings or mountings to minimise the vibration caused by air passing through
 - Not exceed the existing background noise level as measured or calculated at the nearest residential property. It is recommended that noise assessments are carried out and submitted with the application
 - Meet the planning requirements for a Conservation Area and Listed Building (see section 4.7)

On a case by case basis an odour impact assessment may be required to determine the need and scale of appropriate extraction equipment,

Suitable odour extraction can contribute toward protecting residents by supporting 2a in Policy R6 ("Proposals within defined centres will be permitted provided they would not result in significant harm to the amenity of nearby residents or highway safety").

Grease deposits in ducting can not only cause nuisance but present a fire risk, therefore a schedule of preventative maintenance and cleaning needs to be submitted with the application.

Particular reference to considering odour extraction for Hot Food Takeaway applications is included in the City Centre Area Action Plan:

Designated centres are often focal points for commercial premises such as restaurants and hot food takeaways. Coventry city centre is no different and is becoming an increasingly popular place for the provision of such uses. Where new restaurants and/or takeaways are provided within the city centre consideration must again be given to the impacts this could have on adjoining uses, most notably in terms of odour control in this instance. As such, all food premises will require an odour extraction system tailored to the nature and location of the premises to prevent nuisance from odours. This will also include sufficient mitigation to prevent noise and vibration nuisance from extraction flues.

4.5 Highway Safety

The impact of hot food takeaways on traffic flow and road safety is an important consideration when determining applications.

Hot food takeaways can attract a high proportion of car-borne and short-stay customers, particularly when areas in which they are located are not highly accessible. Often, in the vicinity of hot food takeaways, there is an increased occurrence of indiscriminate parking and interruption to the free flow of traffic along the roads adjacent to these premises. Customers

may be tempted to park inappropriately and indiscriminately for short periods to quickly pop in and out of takeaway premises, often jeopardising the safety of other road users and the free flow of traffic on the highway network.

As a consequence, this can also lead to an increase in noise and have a detrimental impact on the air quality and amenity of the area during the opening times of the hot food takeaway.

Insufficient parking facilities in and around hot food takeaways can also have an adverse impact on the amenity of the immediate and surrounding areas. The increased demand for on-street parking, particularly in the evenings and at weekends when this demand is at its highest and often inconveniences local residents.

Highway Safety: Information must be submitted with the application to evidence that the hot food takeaway will not cause detriment to highway safety in accordance with Local Plan policies contained within Chapter 10 (Accessibility). Further guidance on Chapter 10 can be found in the Coventry Connected SPD

In reviewing a proposal, the impact on the safety of pedestrians and road users will be considered with regard to:

- The existing use of the site
- Existing traffic conditions
- The accessibility of the site by public transport, cycling and walking
- The availability of easily accessible private and public parking provision in close proximity to the premises, including on-street parking
- Proximity of proposal to junctions, pedestrian crossings, and bus stops
- The availability of safe and legal loading areas in close proximity
- The implications for the amenity of the surrounding area

Please note, the above is not an exhaustive list and further information on Highway Safety can be found in the Coventry Connected SPD⁶.

A delivery and service plan statement will be required for all applications.

Where a proposal is considered to have an unacceptable impact on highway safety, the Council may request extra evidence, amendments or conditions to the application. Failure to comply with this may ultimately result in a refusal of planning permission.

4.6 Opening Times and Crime & Safety

The proposed hours and days of opening should be specified as part of planning applications for hot food takeaways. Any agreed hours of opening will be made a condition of the planning permission if it is granted and, in some instances, proposals will only be accepted if opening hours are restricted

As mentioned at the beginning of this document, the Council recognises the important role that

⁶ <http://www.coventry.gov.uk>

hot food takeaways can play in the local economy.

When a hot food takeaway application meets the majority of requirements in this document and the policies within the Local Plan, but might only meet all of the requirements if a limitation on the opening hours is imposed, a condition of restricting the opening hours will be considered.

Opening times will be considered on a case by case basis. When considering if an application might be approved with conditions on the opening hours, regard will be had to:

- The existence of an established late night economy in the area
- The character and function of the immediate area
- The potential benefits of the proposal for the wider community
- The impact of opening hours and the resulting effect of noise, crime, antisocial behavior, vibration and odours on neighbouring uses
- The impact on highway safety
- The impact on the health and wellbeing of pupils, students and their families attending local schools, colleges and academies

In these cases, the application may be approved with conditions specifying the opening hours, benefitting the local economy, yet minimising any negative impact on local residents and visitors to the area.

In order to protect the amenities of nearby residents by promoting a safe and secure environment which deters anti-social behaviour, crime and reduces the fear of crime, proposals for hot food takeaways should provide evidence that crime and security matters have been taken into consideration and appropriately addressed. Advice can be sought from the West Midlands Police at the pre-application and planning application stages. Where appropriate, mitigation measures may be sought (as conditions), such as installation of lighting or CCTV.

Where a proposal is considered to have an unacceptable impact on safety in the area, the Council may request extra evidence, amendments or conditions to the application on behalf of the West Midlands Police. Failure to comply with this may ultimately result in a refusal of planning permission.

4.7 Conservation Areas and Listed Buildings

As with all planning applications, the applicant will also need to ensure that listed building consent and planning requirements in a conservation area are considered. More information can be found under the Conservation and Archaeology section of the Local Plan⁷ and the “Design guidance on shop fronts for conservation areas and historic buildings”⁸.

⁷ <http://www.coventry.gov.uk>

⁸ <http://www.coventry.gov.uk>

This includes the aesthetics of the extraction unit and flue (see section 4.4) and bin storage (see section 4.3)

5 Other Considerations and Legislation affecting Hot Food Takeaways

It is recommended that applicants also consider other areas that are not covered by planning policy, but whose regulations and requirements could still affect a hot food takeaway. These include, but are not limited to:

a. Licensing

If the hot food takeaway wishes to sell hot food and/or hot drink to the general public between the hours of 11p.m. and 5 a.m. then the hot food takeaway must apply to the Council for a Premises License. Application forms and details of the application fees and the annual charges can be found on the Councils website⁹.

All applications for licenses and decisions made by the Council when considering applications must promote the four licensing objectives;

- The prevention of crime and disorder
- Public safety
- The prevention of public nuisance
- The protection of children from harm.

When considering applications for licenses, the Council will also have regard to its Licensing Policy¹⁰.

For further information please contact the Licensing Team on licensing@coventry.gov.uk or 024 76831888.

b. Food Safety

The proprietor of any hot food takeaway must register the premises as a food business with the Council's food safety team at least 28 days before the premises opens for business.

More information is available on the Councils website¹¹. It is strongly advised that the applicant should contact the food safety team prior to the application for planning permission (ehcommercial@coventry.gov.uk). Food safety officers can provide detailed advice on the current requirements of food hygiene and health and safety legislation. Advice provided before any application is submitted can help ensure that all necessary requirements are met prior to the commencement of the business.

The food safety team can be contacted on 08085 834333.

⁹ <http://www.coventry.gov.uk>

¹⁰ <http://www.coventry.gov.uk>

¹¹ <http://www.coventry.gov.uk>

c. Building Control

The applicant will need to comply with any relevant building regulations. More information can be found on the councils website¹² or by contacting the Building Control team on 024 76 832057.

d. Litter and Waste Disposal

Further information on how to reduce litter (and therefore the impact of litter) caused by hot food takeaways can be found at “Reducing litter caused by ‘food on the go’ – A Voluntary Code of Practice for Local Partnerships” by DEFRA¹³.

The applicant needs to consider their duty of care to dispose of waste lawfully under the Environmental Protection Act, for example all waste generated must be removed by an authorised waste contractor and providing an accurate description of waste (through the use of an appropriate transfer note). Further information on this can be found on the Waste Duty of Care Code of Practice produced by DEFRA in March 2016¹⁴.

Consideration should also be had to relevant acts, such as the following (non-exhaustive) list:

- Environmental Protection Act 1990 Section 34
- Environmental Protection (Duty of Care) Regulations 1991 Regulation 4
- The Waste [England and Wales] Regulations 2011 Section 35

Other considerations for litter and waste disposal include, but are not limited to:

- Commercial paper and cardboard waste is not allowed to be burnt
- Used cooking oil must not be poured down the drains

If you would like further advice regarding fulfilling your Duty of Care obligations please contact the Environmental Advice Section on 024 7683 2155. Alternatively you can contact the Commercial Waste Section to arrange for a waste management contract (wastesolutions@coventry.gov.uk, telephone 024 7683 2255).

¹² <http://www.coventry.gov.uk>

¹³ <https://www.gov.uk/government/publications/reducing-litter-caused-by-food-on-the-go-a-voluntary-code-of-practice-for-local-partnerships>

¹⁴ <https://www.gov.uk/government/publications/waste-duty-of-care-code-of-practice>

Appendices

Appendix A: Supporting information and evidence base to Hot Food Takeaway Supplementary Planning

This is an evidence base focusing on the harms of excess weight and the relationship between hot food takeaways within close proximity of schools and levels of obesity. It provides the evidence to support the requirement shown in section 4.2 in the Hot Food Takeaways Supplementary Planning Document (HFT SPD) with regard to planning applications for hot food takeaways. This appendix covers the impacts of obesity, particularly childhood obesity, and the current situation (locally, regionally and nationally). It also covers information around the concentration of hot food takeaways in different areas. This information has been used to inform requirement 4.1 – concentration of hot food takeaways.

1.1 Excess weight (defined as weight that is in excess of the ideal body weight) and obesity are associated with a myriad of health problems. These include heart disease¹, stroke, high blood pressure, diabetes and arthritis. For example, 90% of adults with type 2 diabetes are estimated to be overweight or obese². Obesity has also been associated with a higher risk of cancer³. The consequences of obesity and excess weight cost the NHS £6 billion annually.⁴ The annual spend on the treatment of obesity and diabetes is greater than the amount spent on the police, the fire service and the judicial system combined.⁵

Obesity has numerous other drawbacks aside from health, including employee absenteeism from work⁶ and social exclusion⁷. Childhood obesity is a major issue facing the UK. It is particularly important due to the adverse implications that childhood obesity has on the economy and society over the long-term, as well as detrimental health outcomes and quality of life for those affected.

Increased obesity from a younger age contributes to a negative impact on the ability of children to live a healthier lifestyle.⁸ 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 children⁹. As children constitute the future workforce of an economy, this is also associated with a reduction in employee productivity¹⁰ and increased spending on health care over the

¹ Yudkin, J. S., Kumari, M., Humphries, S. E., & Mohamed-Ali, V. (2000). Inflammation, obesity, stress and coronary heart disease: is interleukin-6 the link?. *Atherosclerosis*, 148(2), 209-214.

² Coventry Joint Strategic Needs Assessment

³ Wolk, A., Gridley, G., Svensson, M., Nyren, O., McLaughlin, J.K., Fraumeni, J.F., Adam, H.O. (2001). A prospective study of obesity and cancer risk

⁴ Rudolph, Tackling obesity through the healthy child programme: a framework for action

⁵ Health matters: obesity and the food environment (PHE 31/03/2017)

⁶ Finkelstein, N., Hanson T., Huang, C.W., Hirschman, B., and Huang, M. (2010) Effects of problem based economics on high school economics instruction.

⁷ Westermann, S., Rief, W., Euteneuer, F., & Kohlmann, S. (2015). Social exclusion and shame in obesity. *Eating behaviors*, 17, 74-76.

⁸ Janssen, H. G., Davies, I. G., Richardson, L. D., & Stevenson, L. (2017). Determinants of takeaway and fast food consumption: a narrative review. *Nutrition research reviews*, 1-19.

⁹ 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. 5 Abbasi A, Juszczak D, van Jaarsveld CHM, Gulliford MC. Body mass index and incident type 1 and type

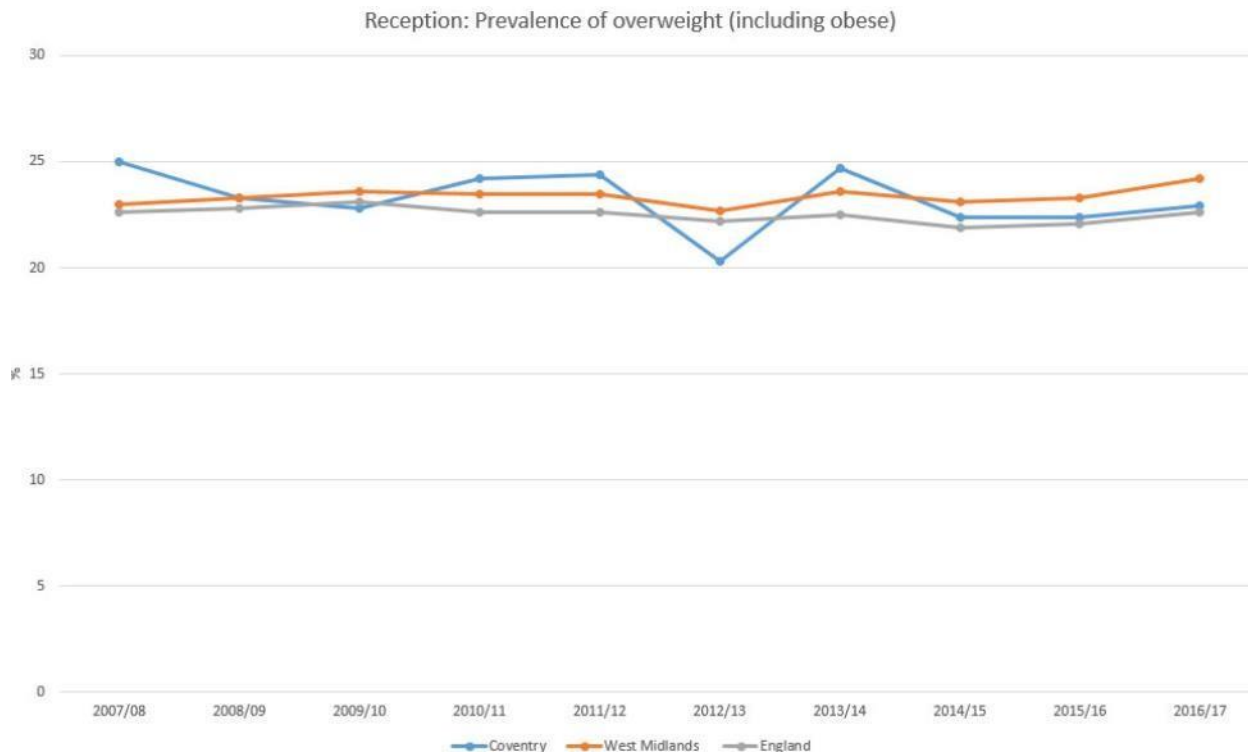
¹⁰ Cawley, J. (2010). The economics of childhood obesity. *Health affairs*, 29(3), 364-371.

lifetime¹¹. This clearly illustrates the importance and relevance of the topic of addressing childhood obesity in the UK, if the UK economy and society is to make the most of the available human resources.

Obesity continues to be an important health issue globally. Even though the precise causes contributing to obesity are various, including cultural, environmental and biological factors; one such cause is the heightened consumption of food¹².

1.2 Obesity amongst children in the UK is on the increase¹³ and in 2016/17, 22.9% of children in reception class (aged 4 to 5) in Coventry have excess weight (including those who are obese), which is lower than regional levels of 24.2 %, but higher than the national level of 22.6% By year 6, these proportions have increased, with 38.2% of children having excess weight (including being obese) for 2016-17 (which is higher in comparison to both 37.1% regionally and to 34.2% nationally).¹⁴ See figures 1 and 2. If trends continue, it is estimated that 1 in 3 people will be obese and 1 in 10 will develop type 2 diabetes by 2034.¹⁵

Figure 1 - Reception: Prevalence of overweight (including those who are obese)



¹¹ Maher, J., Fraser, S., & Wright, J. (2010). Framing the mother: childhood obesity, maternal responsibility and care. *Journal of Gender Studies*, 19(3), 233-247.

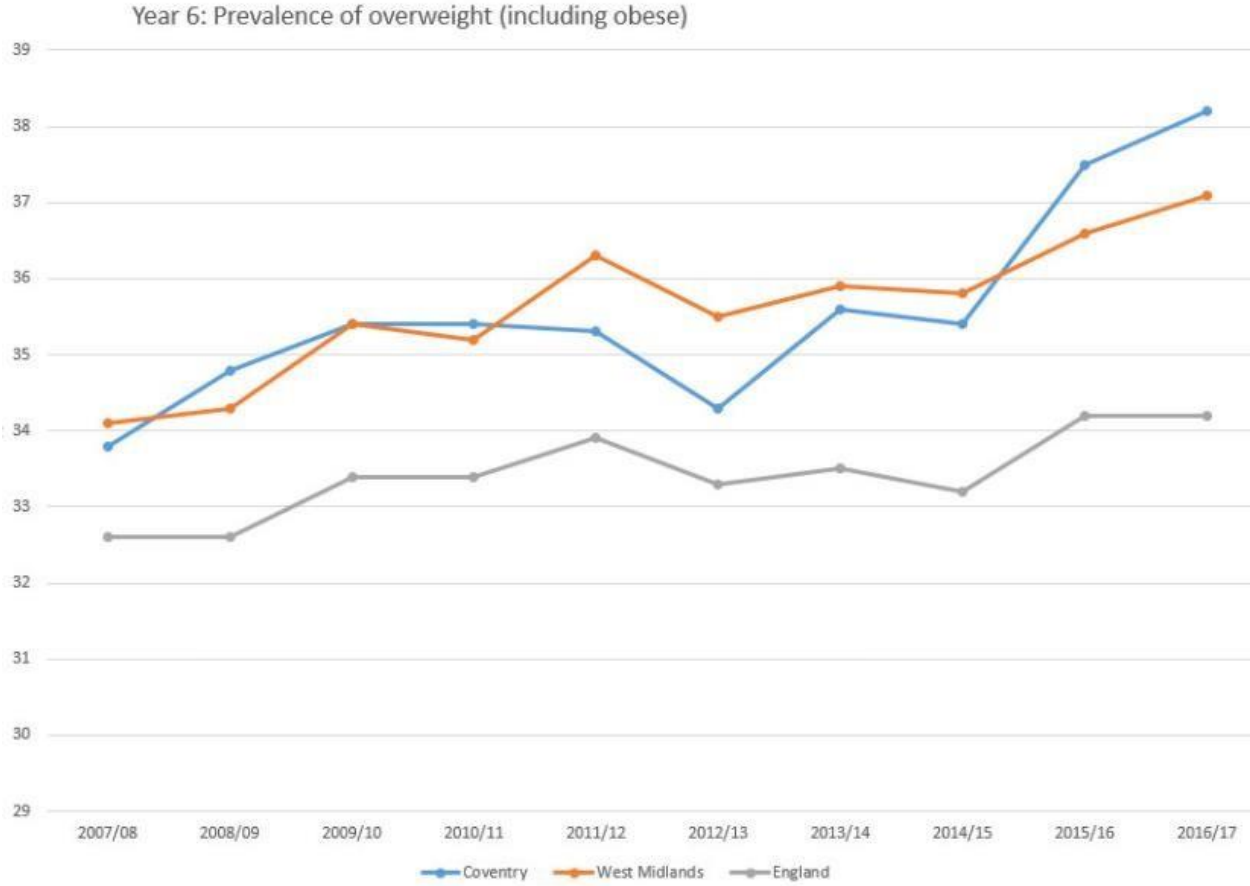
¹² Obesity: Future Choices – Project Report. 2nd Edition (Government Office for Science)

¹³ <https://www.theguardian.com/society/2017/oct/19/obesity-primary-school-reception-children-nhs-digital-figures>

¹⁴ Coventry Join Strategic Needs Assessment

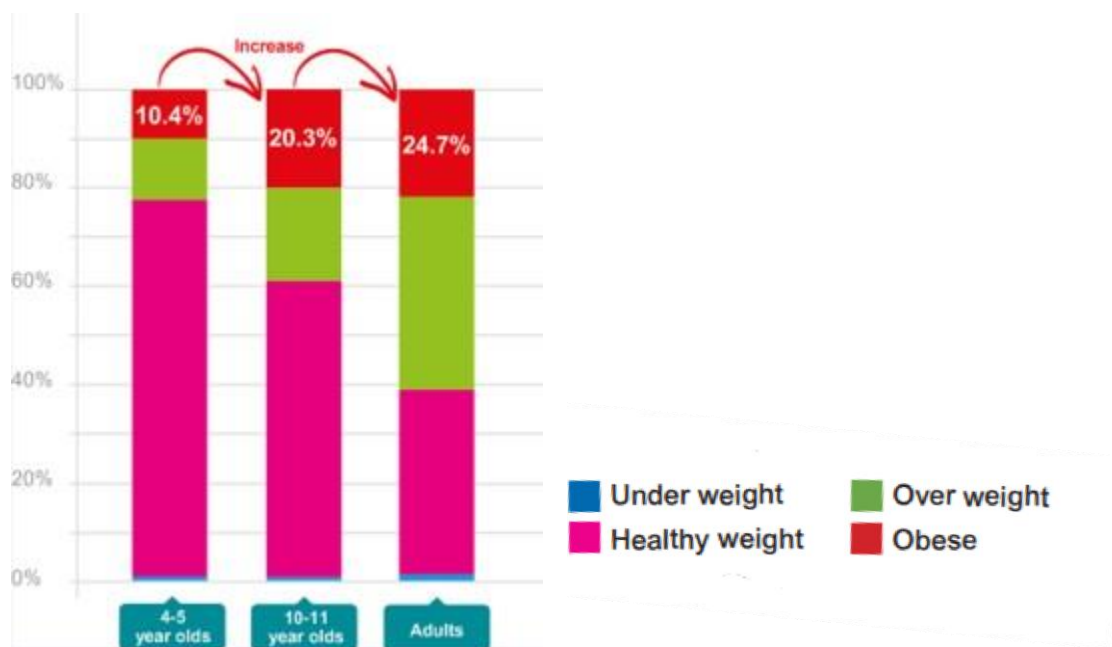
¹⁵ Public Health England: Public health matters: Preventing Type 2 diabetes (Jennifer Smith, 24/05/2018)

Figure 2 – Year 6: Prevalence of overweight (including those who are obese)



Being overweight or obese in early life increases the risk of adult obesity, along with a higher risk of premature mortality in adulthood, see figure 3.

Figure 3: How the provenance of obesity changes over time



Data from 2015 – 2016 indicate that in Coventry, 64% of adults in the city have excess weight (higher than the regional average which stands at 63.9% and the national average at 61.3%) and the prevalence of excess weight and obesity is known to be rising overall.

1.3 A number of studies and mapping exercises suggest that there is a greater number of hot food takeaways and obesity in deprived areas^{16 17 18 19} and that takeaways are likely to be contributing to inequalities in childhood obesity²⁰. There is a clear deprivation-related inequality within Coventry, with proportions of obesity ranging from 17% in Wainbody to 30% in Longford.²¹ This shows that it is in Coventry’s most deprived areas that obesity levels are at their highest and therefore reducing obesity levels will help reduce health inequalities in Coventry, supporting the principles behind Coventry being a Marmot City.

Men in the most affluent areas of the city will live, on average, 9.4 years longer than men in the most deprived areas, while for women the difference is 8.7 years. These inequalities in life expectancy and health arise out of inequalities in society - they are not inevitable - and there are ethical, social and economic reasons why they should be prevented. As well as improving health outcomes, reducing inequality in society has been shown to lead to improvements in wellbeing,

¹⁶ Strategies for Encouraging Healthier ‘Out of Home’ Food Provision. A toolkit for local councils working with small food businesses. Local Government Association

¹⁷ Turbutt, C. Richardson, J. and Pettinger, C. (2018). The impact of hot food takeaways near schools in the UK on childhood obesity: a systematic review of the evidence. *Journal of Public Health*.

¹⁸ Obesity and the environment. Density of fast food outlets. Public Health England

¹⁹ Strategies for Encouraging Healthier ‘Out of Home’ Food Provision. A toolkit for local councils working with small food businesses. Local Government Association

²⁰ House of Commons Health Committee – Childhood obesity: Time for action. Eighth Report of Session 2017 - 19

²¹ Coventry Joint Strategic Needs Assessment

better mental health, better community and social relations, reduced levels of violence and better educational attainment.

Tackling the causes of health inequalities cannot be done through health services alone. The transfer of public health services to local authorities provided Coventry with an opportunity to continue to broaden the ownership of the health inequalities agenda.

Coventry is committed to delivering rapid change in health inequalities and was one of seven cities in the UK invited to participate in the UK Marmot Network and became a Marmot City. Being a Marmot City has brought together partners from different parts of Coventry City Council and from other public sector and voluntary organisations, whose decisions and activities have an impact on health.

The Marmot principles, from the Marmot Review, Fair Society, Healthy Lives which aim to reduce inequality and improve health outcomes for all have been embedded into the core functions of the council and its partners. Improving health and reducing inequalities in Coventry is not only a priority for the NHS and public health - it is a priority for everyone who is working to improve the lives of people in the city. A policy recommendation from the Marmot Review is to improve the food environment in local areas across the social gradient.

1.4 According to the National Diet and Nutrition survey, just over 1 in 5 children eat a takeaway meal at home at least once a week. This may under-estimate total takeaway food consumption by children, as it does not include takeaway food consumed outside the home.²²

The majority of hot food takeaways offer food which is energy dense and nutritionally poor. Out of home meals generally contain significantly higher intakes of sugar, fat, salt and portion sizes tend to be bigger, as well as usually being cheap and easily available²³. Current daily guidelines for adults in the UK are that men should consume approximately 2500 kcal per day and women approximately 2000 kcal per day. Of this total daily energy intake, not more than 11% (30 g for men and 20 g for women) should be from saturated fat. Adults should reduce their daily intake to less than 6 g of salt per day (SACN). Sampling by Liverpool John Moores University has identified that a single portion of fish and chips can contain between 1076 and 2476 calories and up to 66g of saturated fat and 9.3g of salt, and that a portion of special fried rice contains between 870 and 1942 calories and up to 23g of saturated fat and 14.4g of salt.

Research suggests that at least 25% of calories are now consumed outside the home and that over the past decade consumption of food away from the home has increased dramatically by 29%, a trend driven by a proliferation of hot food takeaways. Research indicates these social and environmental trends could be contributing to rising levels of overweight and obesity in the UK.²⁴ We live in an obesogenic environment, where the less healthy choices are the default (which can lead to excess weight gain and obesity).

The increased focus of academics and researchers on obesity has contributed to emergence of a new area of research which explores the relationship between obesity and food environment and the importance of addressing this.

²² House of Commons Health Committee – Childhood obesity: Time for action. Eighth Report of Session 2017 - 19

²³ Health matters: Obesity and the food environment (31st March 2017). Public Health England

²⁴ Health matters: Obesity and the food environment (31st March 2017). Public Health England

1.5 Studies have shown that people exposed to the highest number of takeaways are 80 per cent more likely to be obese and 20 per cent more likely to have a higher Body Mass Index than those with the lowest number of encounters.²⁵ Coventry has 1.04 takeaways per 1,000 population (compared to a West Midlands average of 1.12 and an England average of 1.09), as shown in figure 5.

Figure 5: Concentration of hot food takeaways²⁶

	Takeaway numbers per 1000 population					Increase in number of takeaways from June 2014 to December 2017
	June 2014	June 2015	June 2016	June 2017	Dec 2017	
West Midlands	0.98	1.00	0.95	1.09	1.12	13.62%
Coventry	0.90	0.91	0.98	0.99	1.04	15.03%
England	0.99	1.00	1.06	1.08	1.09	10.32%

Although the average number of hot food takeaways in Coventry is currently slightly lower than the regional and national average, the rate of increase is higher. Without any limitations on new hot food takeaway applications you would therefore expect Coventry to have a greater number of takeaways per 1000 population in the future, supporting requirement 4.1 to limit over concentration of hot food takeaways “In areas that have become over concentrated by hot food takeaways, further hot food takeaway applications will not be permitted”. Coventry’s HFT SPD goes on to say “An area will be classed as over-concentrated with hot food takeaways if the proposed address falls into a LSOA where the number of takeaways per one thousand population exceeds the average for England as per the most up to date data on the FEAT tool (<http://www.feat-tool.org.uk/map/>).” Currently the average number of takeaways per one thousand population in England is 1.09 per 1000 population.²⁷

These threshold’s show compatibility with other Planning Policies in Coventry regarding over concentration of hot food takeaways. For example, the City Centre Area Action Plan states in Policy CC15 “Far Gosford Street will be regarded as a local centre meaning proposals for local shopping provisions will be supported. This will however exclude the provision of any further hot food takeaways (use class A5), which will not be permitted.” Currently, there are 6.86 takeaways per 1000 population in the LSOA that Far Gosford Street is in. This would breach the national average for concentration of takeaways in a LSOA (currently 1.09 per 1000 population).

An example where the threshold requirement 4.1 (Concentration of Hot Food Takeaways) would be met would be an application for a hot food take away on the Major District Centre of Brandon Road as the number of takeaways per 1000 population in this LSOA is only 0.57, less than the England average.

²⁵ Burgoine, T., Forouhi, N.G., Griffin, S.J., Wareham, N.J. & Monsivais, P. (2014), ‘Associations between exposure to takeaway food outlets, takeaway food consumption, and body weight in Cambridgeshire, UK: population based, cross sectional study’, *BMJ* 2014, 348: g1464

²⁶ Food environment assessment tool (Feat) insert year, UKCRC Centre for Diet and Activity Research (CEDAR), University of Cambridge, <http://www.feat-tool.org.uk>. Leaflet | Map data © OpenStreetMap | © Crown Copyright and Database Right insert year. OS (100059028) | Copyright and database right © 2017 CEDAR/MRC Epidemiology Unit. All rights reserved.

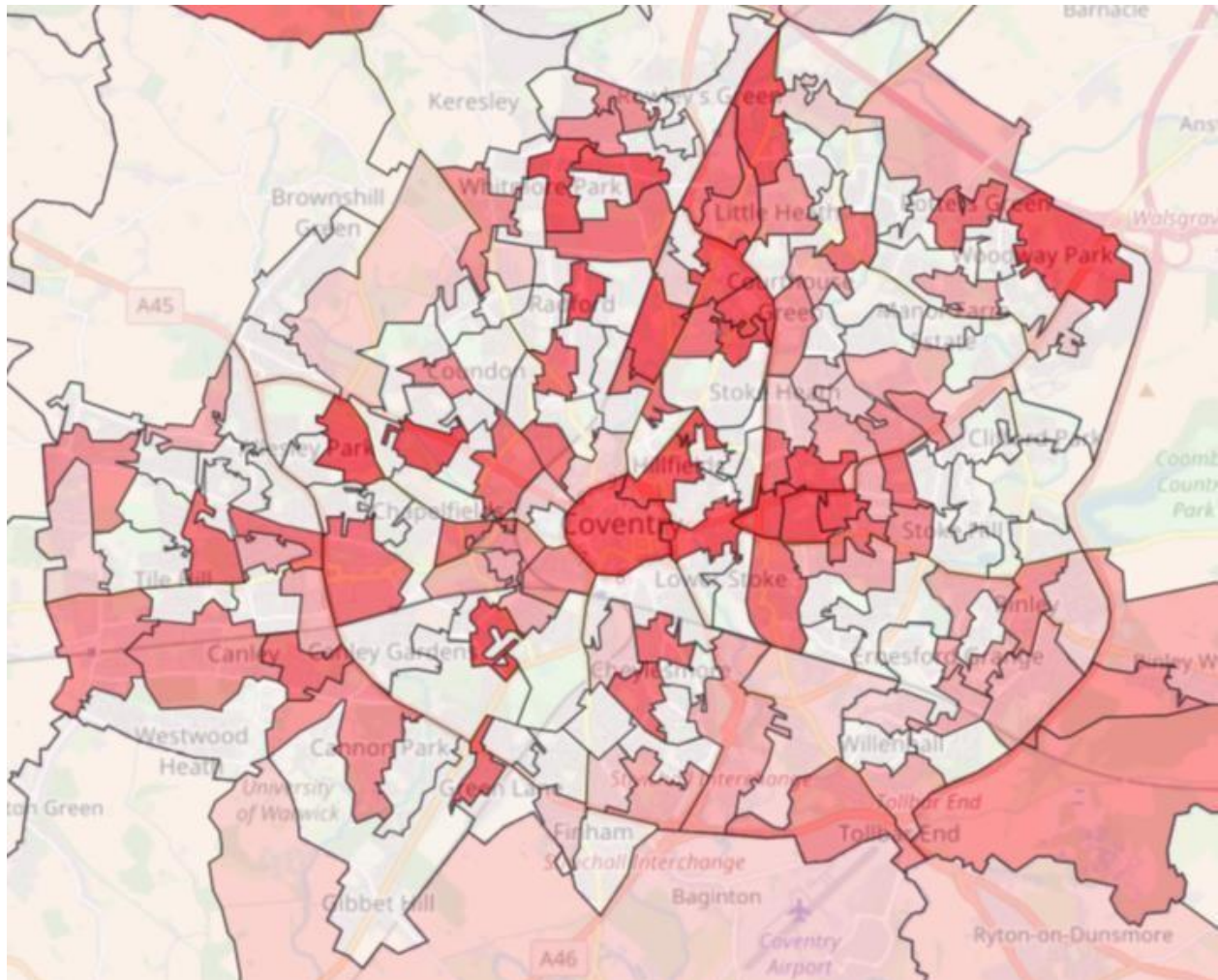
²⁷ Food environment assessment tool (Feat) insert year, UKCRC Centre for Diet and Activity Research (CEDAR), University of Cambridge, <http://www.feat-tool.org.uk>. Leaflet | Map data © OpenStreetMap | © Crown Copyright and Database Right insert

Figure 6: Number of Takeaways per 1000 population for defined centres in Coventry ²⁸

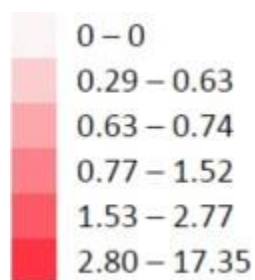
Defined Centre (as per Policy Map)	Number of Takeaways per 1000 population (in the corresponding LSOA).*		
City Centre	17.35		
Major District Centre			
Arena Park	2.29 and 2.41		
Cannon Park	1.12		
Brandon Road	0.57		
Eastern Green	0		
District Centres			
Ball Hill	2.82, 3.37 and 4.93		
Bell Green	0 and 2.68		
Brade Drive	0, 0.62 and 2.81		
Daventry Road	0, 0.62, 1.88 and 2.16		
Earlsdon	0.67 and 3.29		
Foleshill	0.56, 2.77, 3.80 and 7.07		
Jardine Crescent	0 and 2.08		
Jubilee Crescent	0 and 4.30		
Local Centres			
Acorn Street	0		
Ansty Road	0, 1.20 and 1.30		
Baginton Road	0.60		
Bannerbrook	0.39		
Barker Butts Lane	0, 1.71 and 2.26		
Binley Road	2.36 and 3.37		
Birmingham Road	0		
Broad Park Road	0 and 0.64		
Charter Avenue	0.77		
Far Gosford Street	6.86		
Green Lane	0.60		
Hillfields	6.65		
Holbrook Lane	0, 1.21 and 2.80		
Holyhead Road	4.67		
Keresley North	0		
Keresley Road	0.62		
Keresley South	0		
Longford	0.51 and 3.21		
Quorn Way	0.67		
Radford Road	0 and 2.56		
Station Avenue	1.52		
Sutton Avenue	1.38		
Walsgrave Road	0.69 and 3.21		
Willenhall	0.52 and 0.64		
Winsford Avenue	2.80		

*Where there is more than 1 figure, this indicates that the centre falls into more than 1 LSOA. Whether or not the proposed takeaway will be deemed to meet the required threshold will depend on the exact address within the centre and the number of takeaways per 1000 population for the corresponding LSOA

Number of Takeaways per 1,000 population: ²⁹



Number of takeaways per 1,000 population:



²⁹ Food environment assessment tool (Feat) insert year, UKCRC Centre for Diet and Activity Research (CEDAR), University of Cambridge, <http://www.feat-tool.org.uk>. Leaflet | Map data © OpenStreetMap | © Crown Copyright and Database Right insert year. OS (100059028) | Copyright and database right © 2017 CEDAR/MRC Epidemiology Unit. All rights reserved.

1.6 Research and reports into the impact of hot food takeaways near schools is an area that continues to expand³⁰. Research has indicated that children attending schools near fast food outlets are more likely to be obese than those whose schools are more inaccessible to such outlets³¹. Further to this, research found that “More frequent takeaway meal consumption in children was associated with unhealthy dietary nutrient intake patterns and potentially with adverse longer term consequences for obesity and coronary heart disease risk³².” Researchers have also successfully identified the link between the hot food takeaway presence within the 400m of schools and childhood obesity^{33 34}. Hot food takeaways within easy walking distance of schools can provide an attractive and affordable food option for pupils.

In addition to this a study by Davis and Carpenter³⁵ found that students with fast food restaurant’s near their schools consumed fewer servings of fruit and vegetables, consumed more servings of soda, and were more likely to be overweight. The study concluded that exposure to poor quality food environments has important effects on adolescent eating patterns and weight issues, and that ‘policy interventions limiting the proximity of fast food restaurants to schools could help reduce adolescent obesity’.

Studies show that food outlets in close proximity to, and surrounding schools were an obstacle to secondary school children eating healthily. Some schools might have a stay-on-site policy during lunch hours, which supports research that has indicated that the most popular time for purchasing food from shops is after school³⁶. Research on the impact of local food environment round schools and its impact on diet, with a specific focus on primary and secondary schools in East London, concluded that the close proximity of hot food takeaway not only influences the obesity of the secondary school students but also the primary school students³⁷. This is because although primary school children are not allowed to leave by themselves, the lack of awareness amongst parents regarding child healthcare and obesity means parents are likely to walk the children to the takeaway. Significant health problems related to obesity start to develop at primary school age and behavior established in early life has been shown to track into adulthood³⁸. As there is a positive relationship between hot food takeaways in close proximity of the school not only in secondary schools, but also primary schools, this HFT SPD specifies schools covering the age

³⁰ Local Government Association (2016) *Tippling the scales: Case studies on the use of planning powers to limit hot food takeaways*.

³¹ Engler-Stringer, R., Ha, L., Gerrard, A. and Muhajarine, N. (2014). The community and consumer food environment and children’s diet: a systematic review. *BMC Public Health*. 14 (522)

³² Donin, A., Nightingale, C., Owen, C., Rudnicka, A., Cook, D. and Whincup, P. (2017). Takeaway meal consumption and risk markers for coronary heart disease, type 2 diabetes and obesity in children aged 9-10 years: a cross-sectional study. *Archives of Disease in Childhood*.

³³ Fraser, L. K., Edwards, K. L., Cade, J., & Clarke, G. P. (2010). The geography of fast food outlets: a review. *International journal of environmental research and public health*, 7(5), 2290-2308.

³⁴ Barrett, M., Crozier, S., Lewis, D., Godfrey, K., Robinson, S., Cooper, C., ... & Vogel, C. (2017). Greater access to healthy food outlets in the home and school environment is associated with better dietary quality in young children. *Public health nutrition*, 20(18), 3316-3325.

³⁵ Davis B, Carpenter C (2009) *Proximity of fast-food restaurants to schools and adolescent obesity* American Journal of Public Health Vol 99, No. 3 505-510

³⁶ Sinclair, S. and Winkler, J. (2009). The School Fringe: from Research to Action. Policy Options within Schools on the Fringe. Nutrition Policy Unit, London Metropolitan University

³⁷ Smith, D., Cummins, S., Clark, C., & Stansfeld, S. (2013). Does the local food environment around schools affect diet? Longitudinal associations in adolescents attending secondary schools in East London. *BMC public health*, 13(1), 70.

³⁸ Craigie, A. M., A. A. Lake, et al. (2011). "Tracking of obesity-related behaviours from childhood to adulthood: A systematic review." *Maturitas* 70(3): 266-284

range for both primary and secondary schools (including special schools, pupil referral units, sixth form colleges and academies) for the requirement in 4.2.

Another publication reviewed the way in which Planning adds value to obesity prevention programmes. The paper remarked that the planning profession has been stated as an important department that can assist in tackling obesity amongst other health care issues facing the UK society³⁹. This HFT SPD is one such example. This was supported by Lowe et al in 2015⁴⁰ when their analysis showed the importance of tackling obesity in general and particularly how critical the role of the planning authority was.

1.7 To identify an appropriate set of requirements for hot food takeaway applications, Coventry have also reviewed and taken into account approaches by other local authorities in tackling obesity. Appendix C shows a list of relevant planning policy and guidance from other local authorities. This includes the relatively common policy of having a 400m exclusion zone around schools for new hot food takeaway applications. The focus on the 400m circumference rule used by many local authorities who have adopted similar policies is that this distance is approximately equivalent to the 10 minute walking duration (five minutes in each direction)⁴¹. The 400m distance and the resultant 10 minute walking duration leaves sufficient time for pupils to leave school, purchase the hot food and subsequently return for the afternoon lessons.

The rationale underlying the map in Appendix B showing the exclusion zones in close proximity to primary and secondary schools (including special schools, pupil referral units, sixth form colleges and academies) in Coventry follows the same principle. There is acknowledgement that a 400m circumference as the crow flies (used by some local authorities) may have different walking times dependent on the street geography of the area. The exclusion zones in appendix B are based on a 5 minute walk from the entrances of a school, created using RouteFinder ⁴², and therefore include consideration of the street geography and create a more accurate indication of a 5 minute walk from the school gates. This will guide those involved in submitting hot food takeaway applications and those involved in the determination of these applications. Additionally, using this approach will contribute towards avoiding legal challenge when enforcing the requirement in the SPD. For example a planning appeal in Barking and Dagenham was allowed as the Inspector considered that 400m would equate to a 5 minute walk as the crow flies and that taking into account site specific factors the actual journey time from the nearest school would take longer than 5 minutes. As a result, the inspector considered it unlikely that the proposed takeaway would therefore attract customer from pupils of the school ⁴³.

A 10 minute walk was considered as there is some evidence to show that it is this greater distance that can impact on the consumption of food from hot food takeaways by pupils⁴⁴, but this evidence

³⁹ Goodwin, D. M., Mapp, F., Sautkina, E., Jones, A., Ogilvie, D., White, M., ... & Cummins, S. (2014). How can planning add value to obesity prevention programmes? A qualitative study of planning and planners in the Healthy Towns programme in England. *Health & place*, 30, 120-126.

⁴⁰ Lowe, M., Whitzman, C., Badland, H., Davern, M., Aye, L., Hes, D., ... & Giles-Corti, B. (2015). Planning healthy, liveable and sustainable cities: how can indicators inform policy? *Urban Policy and Research*, 33(2), 131-144.

⁴¹ Healthy People, healthy places briefing: Obesity and the Environment: regulating the growth of fast food outlets (March 2014)

⁴² <http://www.routeware.dk/routefinder5/routefinder.php>

⁴³ 122 Fanshawe Avenue, Barking, appeal allowed for a change of use from A2 to A5 takeaway (ref: APP/Z5060/A/11/2167225)

⁴⁴ Hot-food takeaways near schools; An impact study on takeaways near secondary schools in Brighton and Hove (September 2011)

is currently limited and therefore Coventry will be using the more robust and evidenced 5 minute walk approach.

1.8 To summarise, the above information shows that obesity, and the long term consequences of obesity, is a growing problem with a significant burden on health and society. In addition, our food choices also directly cause and exacerbate other health risks un-related to obesity – such as the impact of trans-fat use on cardiovascular risk; and impact of salt in food on the risks from high blood pressure.

This appendix also shows that obesity is influenced by many factors, and hot food takeaways are just one of those factors. For this reason, the requirement shown in section 4.2 with regard to planning applications for hot food takeaways within a 5 minute walk of a primary or secondary school (including special schools, pupil referral units, sixth form colleges and academies) is not seen as the sole solution to reducing childhood obesity in Coventry. Coventry City Council and its partners are taking a broader approach to tackling childhood obesity, which the requirements in the HFT SPD can contribute to. More information on this whole systems, holistic approach (including working with schools, healthy eating campaigns and community cooking skills) can be found at Director of Public Health Annual Report 16/17 ‘Shape-Up’.

1.9 In addition to the other Local Authorities listed in Appendix C that have already implemented similar policy(ies) and requirements, there is a whole host of organisations (locally and nationally) making recommendations for Local Authorities to implement similar planning policy and requirements. These include:

Garden City Standards – Practical Guides for Creating Successful New Communities. Guide 8 (Creating health-promoting environments)

This guide was launched in December 2017 by the Town and Country Planning Association, It includes guidelines for local authority policies to avoid over-concentration of hot-food takeaways and to restrict their proximity to schools, town centres or other facilities aimed at children, young people and families.

Healthy Lives, healthy people – our strategy for Public Health in England.

This government publication explicitly recognises that “*health considerations are an important part of planning policy*”

Healthy Urban Design Unit – Using the planning system to control hot food takeaways, A good practice guide

Recommends a range of policies or criteria to be used together, including to address:

- A concentration and clustering of hot food takeaways in town or local centres
- Hot food takeaways in close proximity to schools
- Restaurant providing a takeaway service
- Hot food takeaways in new developments
- Residential amenity, such as noise and odour

Healthy Weight, Healthy Lives: A Cross-Government Strategy for England (2008)

In this strategy, the Secretary of State for Health proposed strategy that planning powers should be used to manage the proliferation of fast food outlets, particularly in proximity to parks, showing how long the concept of using planning controls in this way has been considered

Local Government Association (2014) – Tipping the scales

There are several key messages in this document, including use of planning powers as part of a community healthy weight strategy and it also emphasises that planning decisions need to refer to health issues where relevant.

The Marmot Review, Fair Society Healthy Lives

This includes a policy recommendation to improve the food environment in local areas across the social gradient.

National Planning Policy Guidance

This shows the responsibility that local planning authorities have to promote healthy communities. The NPPG states:

- *“local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making”*

National Institute for Health and Clinical Excellence (NICE) - Prevention of cardiovascular disease at population level PH25 (June 2010) and Preventing Type 2 disease – population and community interventions PH35 (May 2011)

National Planning Policy Framework (NPPF)

Identifies that the planning system can play an important role in creating healthy, inclusive communities (paragraph 69)

This further encourages the consideration of health in planning decisions, stating:

- Local planning authorities should *“work with public health leads and organisations to understand and take account of the health status and needs of the local population...including expected changes, and any information about relevant barriers to improving health and wellbeing”*
- And that planning policies and decision should take account of and support local strategies to improve health and wellbeing for all (para 17)

National Planning Policy Guidance (NPPG)

This identifies a range of issues that could be considered through the plan-making and decision-making processes, including promoting access to healthier food. The NPPG states that particular regard should be given to bringing forward supplementary planning documents that

- *Limit the proliferation of certain use classes in identified areas*

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*
- *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*
- *Odour and noise impact*
- *Traffic impact*
- *Refuse and litter*

Obesity and the environment: regulating the growth of fast food outlets (Public Health England, Chartered Institute of Environmental Health and Local Government Association)

This acknowledges that the majority of Local Authorities with a policy in place regarding new hot food takeaway applications and proximity to schools use a distance of 400m (taken to be approx. 5 min walk), however at least one Local Authority found the ground covered by pupils was actually a 800m radius during lunchtime and have used this.

Obesity and the food environment (Public Health England, 2017)

This document also discusses using planning policies to tackle obesity, ensuring development avoids over-concentration of hot food takeaways in existing town centres or high streets, and restricts their proximity to schools or other facilities for children and young people and families.

Planning healthy weight environments - a TCPA reuniting health with planning project (December 2014)

This guidance identifies themes and elements of a healthy-weight environment. Amongst others, this includes the food retail theme, with specific elements including that the development should avoid “*overconcentration of hot-food takeaways (A5 uses) in existing town centre or high streets, and restrict their proximity to schools or other facilities for children and young people and families*”

Shape Up Coventry – The urgency of promoting healthy weight among children and young people

The Director of Public Health Annual Report for 2016 focuses on childhood obesity, one of the most pressing public health concerns and ensuring that the next generation stays a healthy weight. It covers more detail around the negative influence of food outlets on childhood obesity and recognises the fact that adolescents at schools with nearby food outlets tend to be heavier.

This report summarises an approach which encompasses all the factors that affect how much people eat, what they eat and how much physical activity they do to ensure a whole systems approach to tackling childhood obesity.

Appendix B

This map showing the 5 minute walk around a school in this appendices document is for illustration purposes only and is not to be used to identify whether or not a proposed hot food takeaway falls within this exclusion zone. To identify the location of a proposed hot food takeaway in relation to these 5 minute walk zones, a larger scale, interactive map can be accessed at www.coventry.gov.uk.

Walking speeds can vary greatly depending on many factors such as height, weight, age, terrain, surface, load, effort and fitness. The average human walking speed is about 5.0 km per hour (3.1 miles per hour). Specific studies have found pedestrian walking speeds ranging from 4.51 km per hour (2.80 mph) to 4.75 km per hour (29.95 mph) for older individuals and from 5.32 km per hour (3.31 mph) to 5.43 km per hour (3.37 mph) for younger individuals and a brisk walking speed can be around 6.5 km per hour (4.0mph)^{45 46 47}. With this in mind, and to

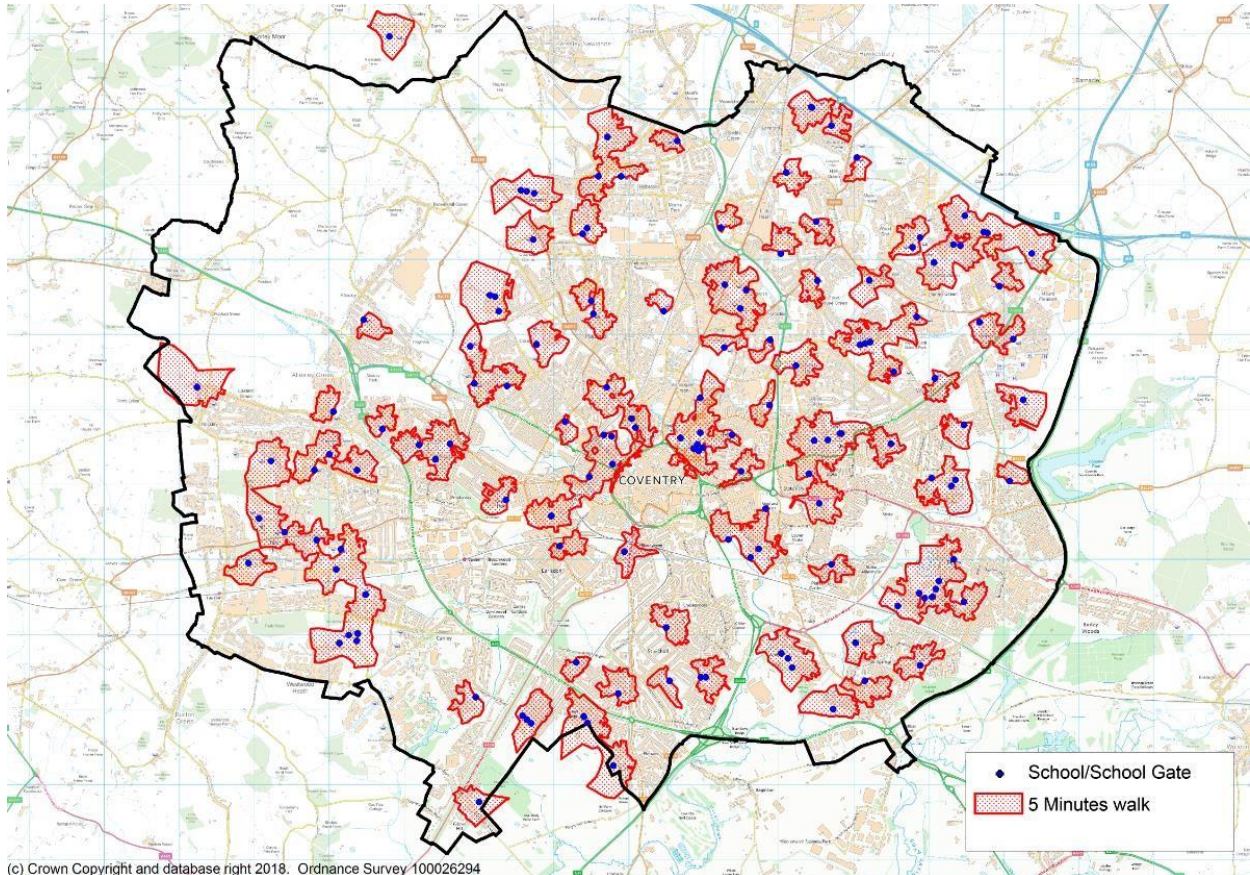
⁴⁵ Study Compares Older and Younger Pedestrian Walking Speeds. TranSafety, Inc. 1997 – 10 -01

⁴⁶ Aspelin, karen (2005-05-25).Establishing Pedestrian Walking Speeds. Portland State University

⁴⁷ About/com page on walking speeds

encompass the variety in age of the pupils, students and families that this requirement is aimed at, this map has been created using the overall average walking speed of 5.0 km per hour (3.1 miles per hour).

Primary and secondary school locations (including for special schools, pupil referral units, sixth form colleges and academies) may change over time, sometimes with new ones opening or an existing one relocating or expanding. In these cases the new location of the gate will automatically have an exclusion zone as per the HFT SPD. Where an existing school closes without a replacement at the same site, the exclusion zone will not apply.



*Any school and/or surrounding 5 minute walk zone falling outside of the Coventry Local Authority area (shown in the black border) is shown for illustrative purposes only.

Appendix C – Other Local Authorities

A number of local authorities have produced planning policies and requirements relating to hot food takeaways and their scope in terms of proximity to schools, concentration, clustering and opening hours. Their scope in these areas has been summarised in brief below. Many local authorities also have policies and requirements around odours, litter and waste product, anti-social behavior, noise, crime and highway safety, which have not been included on the below table.

Some of the below are still going through the adoption process, however the majority have been successfully adopted by the relevant local authority.

Local Authority	Restrictions on concentration and clustering of hot food takeaways	Restrictions on proximity to schools	Restrictions on opening hours
Barking & Dagenham	5% limit on A5 units and/or frontage. No more than two adjoining frontages to be A5; at least two non-A5s between groups of A5.	400m around primary and secondary schools (measured from the school boundary)	
Barnsley	No more than two A5 units are located adjacent to each other; no less than two non-A5 units between groups of A5 units	400m around primary and secondary schools or Advanced Learning Centre	
Birmingham	No more than 10% of units within the centre or frontage to be A5		
Bolton		Applications within 400m of a secondary school may be refused	
Bradford		Outside district centres, applications for hot food takeaways will not be allowed within 400m of the boundary of an existing primary or secondary school, youth centred facility , recreation ground or park boundary	If the application is granted, opening hours will be given as a condition dependent on a variety of factors.
Brent	Applications will be refused if they will result in: 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	An A5 application will not be approved if it is within 400 metres of a secondary school or further education establishment entrance/ exit point	
Bristol		Limiting A5 applications within close proximity (up to 400m) of a school	
Bromley	Proposal should not result in an over concentration of food and drink establishments		The opening hours must not cause any harm, or loss of amenity to nearby residents
Central Lancashire	Applications must not result in an over concentration in the centre	400m or primary or secondary, special school or sixth form college will not be approved	

Dudley	No more than 5% of the frontage to be A5 uses No more than two A5 uses will be permitted adjacent to one another	400m of an existing primary and secondary school or other youth centre facility will not be approved	
Gateshead	Permission will not be granted where the number of approved A5 establishments, within the ward, equals or exceeds the UK national average, per 1000 population No clustering of A5 uses to the detriment of the character and function or vitality and viability of a centre or local parade or if it would have an adverse impact on the standard amenity for existing and future occupants. Two consecutive A5 uses in any one length of frontage not permitted (Where A5 uses already exist, a gap of at least two non A5 uses is required before a further A5 use is permitted in the same length of frontage)	Applications will not be approved in a 400m radius of entry points to secondary schools, youth centres, leisure centres and parks. Permission will not be granted in wards where there is more than 10% of the year 6 pupils classified as obese	
Greenwich	25% limit on non-A1 frontage	Applications will not be approved within 400m around primary and secondary schools (measured from school boundary)	
Halton	No more than 1 unit or 5% in a defined primary frontage or 2 units or 10% in a defined secondary shopping frontage No more than 2 A% units adjacent to each other and no less than 2 non-A5 units between hot food takeaways	Applications will not be approved within 400m of primary, secondary schools, playing fields and children's play spaces	Proximity to primary schools, secondary schools or sixth form colleges to be considered for hours of operation
Hammersmith and Fulham	No more than 20% of the length of the local shopping centre frontage as a whole will be permitted to change to food and drinks uses (A3, A4, A5)	Areas where children are likely to congregate – schools, parks and youth facilities	
Islington		Restrict potential harmful uses such as takeaways when they are in close proximity to schools; or where they are over concentrated	
Knowsley	The following must not be exceeded: a) More than 10% of units within town centres being hot food takeaways; b) More than 20% of units within district centres, local centres and shopping parades being hot food takeaways; c) More than two directly adjoining hot food takeaways in a single centre's frontage; and d) Less than two non-hot food takeaway units between individual or groups of hot food takeaway units		Conditions on opening hours will consider: a) The likely impacts on residential amenity; b) The existence of an established late night economy in the area; c) The existence of a primary or secondary

			school within close proximity of the proposal; and d) The character and function of the immediate area.
Lambeth	Centre specific restrictions for clustering	Applications will not be approved within 400m of secondary or primary school boundary	
Leeds	a) No more than two consecutive A5 uses should be located adjoining to each other. b) Between groups of existing A5 uses, there should be at least two non A5 uses. c) Where the parade has fewer than 20 units, no more than 4 A5 units will be permitted in total.	New hot food takeaways will not be permitted within 400 metres of a secondary school main school building except within the boundaries of designated centres	
Lewisham	a. the percentage of hot food take-away shops in Major and District Centres does not exceed 5% and in Local Centres does not exceed 10% b. the number of hot food take-away shops in Local Parades of nineteen units or less does not exceed one hot food take-away shop c. the number of hot food take-away shops in Local Parades of twenty or more units does not exceed two hot food take-away shops d. the location and design is acceptable and the p	The Council will not grant planning permission for new hot food take-away shops that fall within 400 metres of the boundary of a primary or secondary school (the exclusion zone).	
Manchester	An A5 application will not be approved if it increases the concentration of hot food takeaway ground floor frontages in a centre to more than 10% of all non-residential ground floor frontages. An A5 application will not be approved if it creates a cluster of more than two hot food takeaways together or reduces the number of units between hot food takeaway clusters to less than two non-A5 uses	Limited within 400m of primary and secondary schools	Restriction of opening hours when near primary schools (3pm – 5.30pm) and secondary schools (closed until 5.30pm)
Medway	Have restricted A5 uses to 10% in town centres and 15% in neighbourhood and local centres	Buffer zone is set at 400m from both secondary and primary schools. This distance is equivalent to a five-minute walk and it is widely used across the country.	Restriction to the hours of operation of hot food takeaways within 400 metres of schools
Newcastle SPD	Regard will be had to:	Hot food takeaways which are located outside of a centre in the	Considerations include:

	<ul style="list-style-type: none"> • The potential benefits of the proposal to the wider community; • The number of existing hot food takeaway premises in the local area and their proximity to each other; • The role and character of the centre or shopping parade and the importance of the number, function and location of shops and other services that would remain to serve the local community; and • The existence of vacant shop units and the general retail health of the centre or shopping parade <p>Clustering and concentration of hot food takeaways will be a consideration when reviewing planning applications, certain criteria must be met:</p> <ul style="list-style-type: none"> • That no more than two consecutive hot food takeaways should be located adjacent to each other; • Between an individual or multiple, adjacent hot food takeaways, there should be at least two non-hot food takeaway shop units. 	retail hierarchy will not be permitted within a designated secondary school exclusion zone (a 10 minute walk)	<ul style="list-style-type: none"> • The likely impacts on residential amenity; • The existence of an established evening economy in the area; • The character and function of the immediate area; including existing levels of night-time activity and noise.
Newham		New applications within 400m around secondary schools will not be approved	
Nottingham		Located at least 400m from secondary schools	
North Tyneside	Prevent the development of A5 use in wards where there is more than 15% of the year 6 pupils or 10% of reception pupils classified as very overweight Proposals for A5 uses will be permitted unless: a. It would result in a clustering of A5 uses to the detriment of the character, function, vitality and viability of the defined centres or it would have an adverse impact on the standard of amenity for existing and future occupants of adjacent land and buildings. b. There are two or more consecutive A5 uses in any one length of frontage. Where A5 uses already exist in any length of frontage, a gap of at least two non A5 use shall be required before a further A5 use will be permitted in the same length of frontage.	Prevent the development of A5 use within a 400m radius of entry points to all middle and secondary schools, as shown on the Policies Map.	
North West Leicestershire	No more than 10% of the total commercial units in specified centres, to be A5 units		

	No more than two A5 units to be located adjacent to each other		
Nuneaton & Bedworth	The proposal will be permitted provided they [...] do not increase the number of units under the A3-A5 use class to over 30% of the centre's total usage	The proposal will be permitted provided they [...] are not within 400m of the boundary of a secondary school	
Rochdale	a)More than 5% of the total ground floor units within a defined Primary Shopping Area being hot food takeaways; b)More than 10% of the total ground floor units within a defined Secondary or Central Shopping Area being hot food takeaways; c)More than 20% of the total ground floor units within an area of a defined centre, outside the above areas, being hot food takeaways; d)More than two hot food takeaways being located adjacent to each other; and v. Any fewer than two non-A5 units between hot food takeaways.	No new Hot Food Takeaways within a 400m Buffer of a secondary school	Restrictions on hours of opening maybe imposed as a condition
Rossendale	Regard will be had to the number of existing hot food takeaway establishments in the immediate area and their proximity to each other.	With regard to proposals which fall outside town centre and local parade locations, hot food takeaways will be resisted where the proposal would fall within: 1. 200m of the boundary of an existing school or youth centred facility 2. 200m of a park boundary.	
Rotherham	Hot Food takeaways will be permitted within town, district and local centres (outside of Primary and secondary Shopping Frontages) where they: a) Would not result in more than 10% of the ground floor units within a defined town or district centre being hot food takeaways; or b) Would not result in more than 25% of the ground floor units within a defined local centre being hot food takeaways ; and c) Would not result in more than two A5 units being located adjacent to each other;	Hot food takeaways (including A3 restaurants with takeaway facilities will not be permitted whete they are within 800m of a primary school, secondary school or college (measures in a straight line from any pedestrian access to the school or college)	
Salford	When considering whether a proposed hot food takeaway would result in an over-concentration of such uses, regard will be had to a variety of fields, including:	To control the availability of hot food takeaways near schools so that "Where a hot food takeaway is	To limit hours of opening so that "Within an area that is

	<p>a) the number of existing hot food takeaway establishments in the immediate area and their proximity to each other;</p> <p>b) the importance of the location for local shopping;</p> <p>c) the type and characteristics of other uses</p>	<p>proposed within 400 metres of a secondary school, planning permission will only be granted subject to a condition that the premises are not open to the public before 5pm Monday to Friday and there are no over the counter sales before that time.” The 400 metre control zone is set as the equivalent of a 10 minute walk from the school.</p>	<p>primarily residential in character, the hours of opening will be restricted to 8am to 10pm on Mondays to Saturdays, with no opening on Sundays and bank holidays.”</p>
Sandwell	<p>Percentage Limit of Hot Food Takeaways in Centres and Parades of Shops:</p> <p>a) Centres with 40 or more units to have no more than 7% of frontages occupied by hot food takeaways;</p> <p>b) Centres with less than 40 units to have no more than 12% of frontages occupied by hot food takeaways</p> <p>No more than 2 adjacent HFTs (at any location)</p>	<p>No new hot food takeaway developments will be permitted where they are within 400m of secondary school or college site (as measured in a direct line from the school entrance(s) used by pupils/students)</p>	
Sefton	<p>Planning permission will only be granted provided that it will not result in the percentage exceeding 5% of total commercial units of the centre.</p> <p>If less than 20 units at in a centre, no more than 1 hot food takeaway unit will be permitted</p>		<p>Restriction zone established around secondary schools and colleges (400m restriction zone) limits opening hours until after 5 pm Monday to Friday.</p> <p>Hours of operation to be established on a case by case basis</p>
South Tyneside		<p>Planning permission will not be granted for A5 uses in areas where the levels of obesity in Year 6 pupils is over 10%</p> <p>Outside of designated town and district shopping centres, proposals for new A5 hot food takeaway uses will only be permitted where the premises are not within 400m of a secondary school boundary</p>	

Southwark	Not to be above 1 per 21 premises (10 on either side of the proposal) The number of A5 premises are not more than 5% of the total number of units in the protected shopping frontages	To be further than 400m from any secondary school boundary	
St Helens	No more than 5% of units in the centre or frontage being A5 No more than two adjoin frontages to be A5	400m around primary and secondary schools and sixth form college either within or outside Local Education Authority control	
Stockton-on-Tees	Within designated centres, applications for hot food takeaways will be supported providing this will not result in harmful over-concentration in the area		
Stoke	Restrictions include: • Within primary frontages in the City Centre and town centres, no more than 10% of the frontage will be in A5 use. • Within secondary frontages in the City Centre and town centres, no more than 20% of the frontage will be in A5 use. • No more than 2 hot food takeaway's being located adjacent each other; • At least 2 non-hot food takeaway units between a group of hot food takeaway units.	Planning permission will not be granted for new hot food takeaway premises within School Exclusion Zones, i.e. within 400m of all secondary schools. The 400m distance will be measured from the school's main entrance.	In determining planning applications for hot food takeaways it may be necessary to control the opening hours by planning condition, to minimise any impact on the local environment and amenity.
Tower Hamlets	No more than 5% of units to be A5 within the defined areas No less than two non-A5 units between groups of hot food takeaways	200m around primary and secondary schools, youth club and/or local authority leisure centre	200m – 400m from schools may be permitted with hours of operation conditioned
Wakefield	5% limit on A5 units and/or frontage Must not create a continuous frontage of more than 3 non-retail (A3-A5) uses No more than two adjoining frontages to be A5; at least two non-A5s between groups of A5s Must not result in more than 25% of the total length of primary shopping frontage in any one street or of any one block being in non-retail use	Proposals for hot food takeaways located within 400m of schools and outside centres identified on the Policies Map will not be supported.	
Waltham Forest	5% limit on A5 frontage; no A5 within 400m of existing A5 [outside designated area] No more than two adjoining frontages to be A5; at least two non-A5s between groups of A5	Hot food takeaways will be resisted where they fall within 400m around schools, youth centres and park boundaries	
Wandsworth		Applications for hot food takeaways will not be approved were they would result in an over-	

		concentration of A5 uses within walking distance of school or colleges (400m) where this could undermine their healthy eating initiatives.	
Waltham Forest	<p>Appropriate concentrations of A5 uses will be assessed based on the following:</p> <p>a) Within Primary, Secondary and Retail Parade Zones^ No more than 5% of the units shall consist of A5 uses Within Tertiary Zones</p> <p>b) outside designated centres No more than 1 A5 unit will be allowed within 400m of an existing A5 unit</p> <p>c) No more than two A5 units should be located adjacent to each other. 2. Between individual or groups of hot food takeaways</p> <p>d) there should be at least two non A5 units</p>	<p>Hot food takeaway shops will be resisted where the proposal will:</p> <ol style="list-style-type: none"> 1. Fall within 400m of the boundary of an existing school or youth centred facility (e.g. YMCA, after school clubs). 2. Fall within 400m of a park boundary. 	
Warrington	<p>In Primary Shopping Frontages, hot food takeaways will not be permitted if they</p> <p>a) Create a continuous frontage of more than three non-retail uses (classes A3 - A5), or 20 metres of non-retail uses;</p> <p>b) Result in more than 25% of the total length of primary shopping frontage in any one street or of any one block being in non-retail use.</p>	<p>Proposals for hot food takeaways located within 400 metres of schools and outside centres identified on the Polices Map will not be supported.</p>	
Wolverhampton	<p>In all centres - no more than two consecutive ground floor shop units in the centre should be occupied by Hot Food Takeaways</p> <p>In centres with more than 40 units, no more than 10% of ground floor shop units in total and no more than 10% of ground floor shop units. In centres with less than 40 units – no more than 15% of ground floor shop units in total and no more than 15% of ground floor shop units in any frontage</p>	<p>New applications within 400 m of a secondary school, 'as the crow flies' will not be approved</p>	
Worcester	<p>The proposed use must not cause the proportion of units in food/drink (use class A3) use to exceed 20% in the areas defined as approach corridors and St John's district shopping centre as shown on the proposals map</p> <p>The proposal must be compliant with the Local plan policies (Appendix 4) with regards to the proportion of units within a geographical area (e.g. in some centres the</p>	<p>When applications for Takeaway Food Outlets within close proximity of schools, colleges and community centres (400m) are received, the relevant organisations should be consulted.</p>	

	proposed use must not result in a continuous frontage of more than two non-retail units. (units are defined as a shopfront width of about 6 metres (20 feet) larger units will be assessed in terms of unit lengths)		
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