Newham Local Plan Examination

4.3 (v) Does policy SP9.e effectively address the cumulative impact of hot food takeaways? Is there a need for more detailed criteria to make the policy effective and consistent in its application across Newham?

We rely on our original representations concerning the need for overall balance and the arbitrary definition of “quality leisure”.

With regard to the proposed modification, we note that this continues to focus on concentration rather than proximity, albeit that it achieves this by setting a distance within which more than three other specified uses might be located, those uses being quite disparate.

We note that the specified uses have little to do with one another and that part of the justification for the policy relates to public health.

We are concerned about how the uses and the limit have been chosen. It seems that this is related to public survey responses. Whilst it is quite legitimate to ask the public what they would like in their town centres, it is unrealistic to expect them to analyse public health effects.

A policy aimed at ensuring retail balance ought to consider each such use individually. A policy aimed at securing public health benefits ought to have evidence that uses to which it relates are harmful and that any threshold is that at which any harm becomes significant.

Overall, we welcome the fact that the policy focuses on concentrations rather than creating arbitrary proximity-based bans.