

Newham's Local Plan

Detailed Sites and Policies Development Plan Document Pre-publication Draft



Evidence Base: **Cumulative Impact v2**

July 2015

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Part 1: Betting Shops and Hot Food Takeaways

Introduction

This part of the document seeks to analyse clustering and cumulative impact patterns in relation to hot food takeaways and betting shops in Newham to help establish suitable policy tools for assessing and managing such impacts. It draws on GIS based analysis, established practice elsewhere and engagement evidence.

Spatial Clustering – by area

Spatial clustering at a strategic (borough-wide) level can be most readily analysed in two ways:

1. assessing the degree of concentration of outlets in Lower Super Output Areas (LSOA); and
2. assessing the degree of spatial proximity of each unit to other equivalent units by looking at the number of others within 400m (5 minute walk).

The former has the advantage of being easy to understand, but is subject to the influence of administrative boundaries which may appear arbitrary in relation to commercial geographies. The second, (used in the Food Mapping Study 2010¹) when presented by area, can appear difficult to understand as it is derived from buffering each unit with a 400m walk area and looking at overlaps, and so in some cases the areas of concentration can be relatively distant from the actual visible cluster. An alternative way to present the phenomenon therefore is to use colour gradation to show by unit, how many others are within 400m.

Lower Super Output Area concentrations

The following maps portray the concentration of betting shops and hot food takeaways in Lower Super Output Areas (LSOAs).

¹ Food Outlet Mapping in the London Borough of Newham 2010
[http://www.newham.gov.uk/Documents/Environment%20and%20planning/FoodOutletMappingintheLondonBoroughofNewham190710\[1\].pdf](http://www.newham.gov.uk/Documents/Environment%20and%20planning/FoodOutletMappingintheLondonBoroughofNewham190710[1].pdf)

Figure 1: Betting Shops by Lower Super Output Area

Licensed Betting Shops in Newham

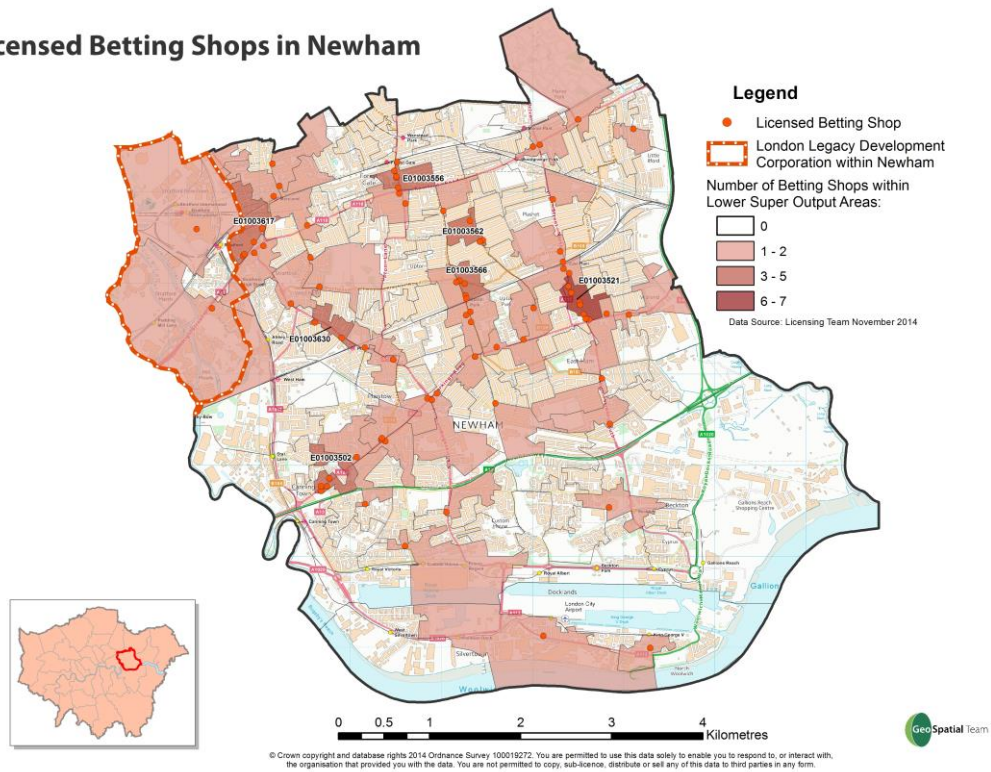
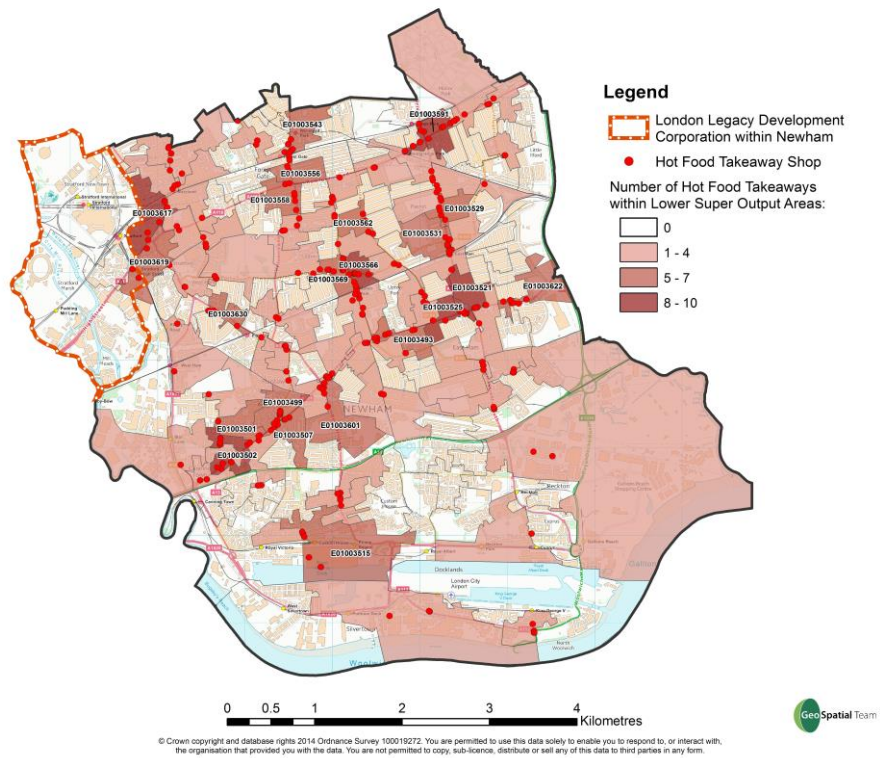


Figure 2: Hot Food Takeaways by Lower Super Output Area



Averages (mean, median and mode) can be used as reasonable benchmarks to assess concentration. To allow for uneven distribution of commercial units across the borough, these averages can be recalculated using only LSOAs with 1 or more.

Unit Type	Mean number per LSOA [for LSOAs with 1 or more]	Median number per LSOA [for LSOAs with 1 or more]	Mode number per LSOA [for LSOAs with 1 or more]
<i>Betting Shop</i>	1 [2]	0 [1]	0 [1]
<i>Hot Food Takeaway</i>	2 [4]	1 [3]	0 [1]

Where LSOA are reasonably fine grained (i.e. in the most densely populated parts of the borough) the maps are more easily related to as they more closely mirror actual geographies. However, concentrations of betting shops are readily identifiable in East Ham, Green Street, Forest Gate, Stratford, Canning Town, and Plaistow, and concentrations of hot food takeaways are readily identifiable in East Ham, Green Street, Forest Gate, Stratford, Canning Town, Custom House, Manor Park and Plaistow. A significant degree of overlap can be seen between concentrations of both types of use. This appears to relate well to the average, in particular the mean, as a tipping point, where only those LSOAs containing one or more units are counted. However, it should be noted that this is a dynamic number that may change with changes to overall numbers.

5 Minute Walk-time Concentrations

Figure 3: Areas where there are x number of betting shops within 400m (5 minutes' walk)

Licensed Betting Shops in Newham

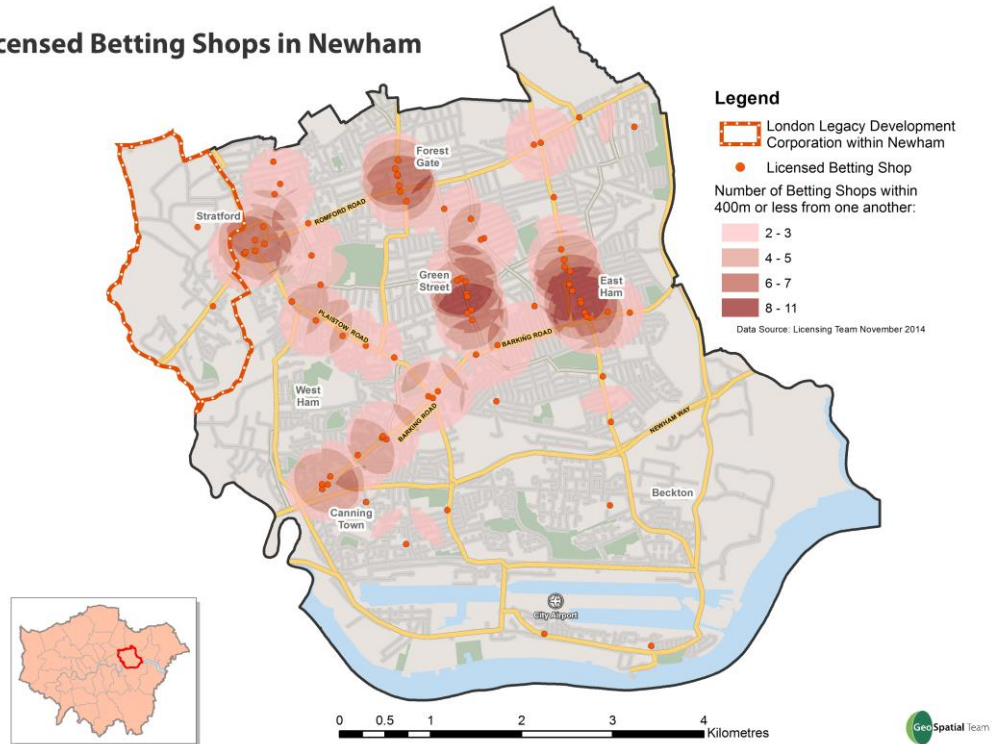
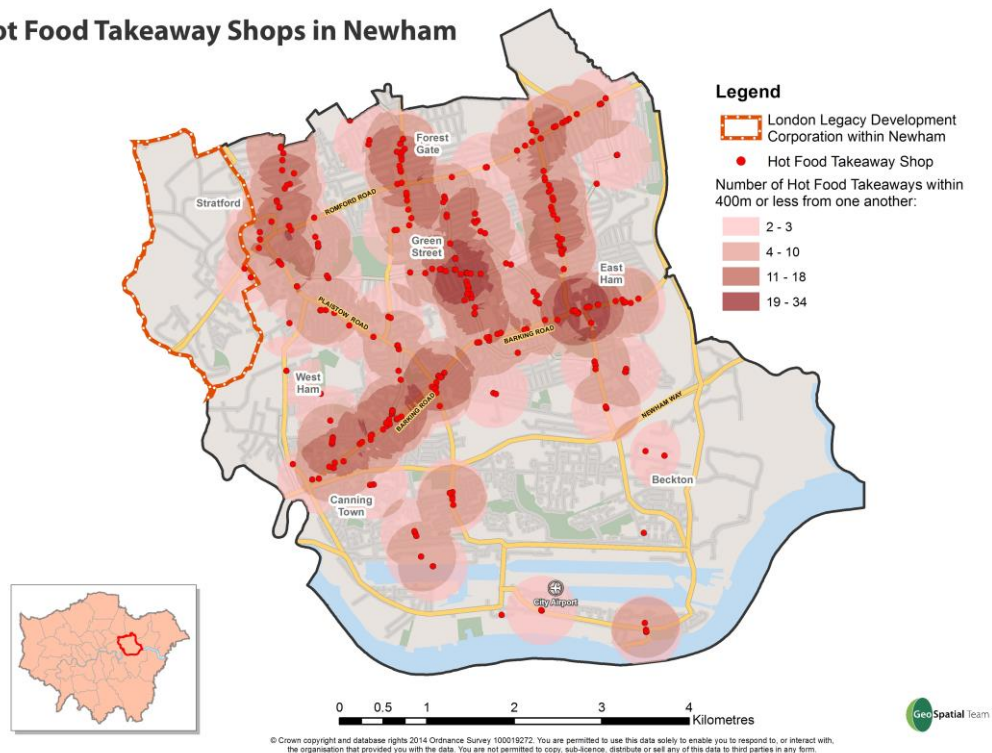


Figure 4: Areas where there are x number of Hot Food Takeaways within 400m

Hot Food Takeaway Shops in Newham



The maps above show, through the shaded zone that a premises (or address point) falls within, how many other units of similar types are within 400m or a 5 minute walk. Again, averages can be used as benchmarks to assess particular concentrations, which for betting shops are again notable in East Ham, Forest Gate, Green Street, Stratford and Canning Town, and for takeaways in East Ham, Green Street, Forest Gate, Stratford, Canning Town, Plaistow and Manor Park, stretching along Key Corridors such as Barking Road, Green Street, High Street North, Leytonstone Road, Romford Road.

Unit Type	Mean number of units within 400m, where overlapping catchments are present	Median number of units within 400m, where overlapping catchments are present	Mode number of units within 400m, where overlapping catchments are present
<i>Betting Shop</i>	4	4	3
<i>Hot Food Takeaway</i>	11	11	11

NB in comparing this table to the maps above, there some areas which are shaded without premises falling within them. This is because this is because of the mapping methodology which is based on overlapping catchments.

Presented alternatively:

Figure 5: Number of other betting shops within 400m of each betting shop



Figure 6: Number of other takeaways within 400m of each takeaway



Unit Type	Mean no. of equivalent units within 400m	Median no. of equivalent units within 400m	Mode no. of equivalent units within 400m
<i>Betting Shop</i>	5	4	1 (i.e. no others)
<i>Hot Food Takeaway</i>	11	11	13

Again this shows clear concentrations of betting shops in East Ham and Green Street, plus Forest Gate, Stratford/Leytonstone Road and Barking Road east of Canning Town; and of takeaways in East Ham (but showing the influence of boundaries, as these are clustered at either end of the town centre) High Street North and Green Street/Plashet Grove and Road, Barking Road around Greengate, Abbey Arms and just east of Canning Town, Stratford and Leytonstone Road, Forest Gate and Manor Park.

However, arguably this does not account for the absolute number (e.g. that in some areas there are 34 takeaways in 400m, or some takeaways have 23 others in 400m of them) and degree of concentration of such units in the borough – i.e. averages are high when compared to averages per LSOA where there are 1 or more, (which would reflect a relatively even distribution of available units given that LSOAs segment linear stretches of commercial ribbon development) and due to overall numbers being high compared to

other areas. An alternative approach may therefore be to derive cluster definitions and thresholds based on impact, discussed further below.

Linear Spatial Clustering

A widely used² definition of clustering in relation to hot food takeaways, and often non-A1 uses in general is a linear one, which works best within defined town or local centre boundaries. This is based on the concept of adequate spacing or buffering between uses with similar impacts so that their impacts are in effect diluted. The definition applied (indirectly – through the specification of how linear clustering will be managed) is where there are more than 2 ‘problem uses’ adjacent to each other, and/or a spacing of less than 2 units between each of them. Town and local centre survey mapping shows where that there are examples of this kind of clustering present in Forest Gate (betting shops and takeaways), East Ham (takeaways), Green Street (takeaways), Stratford (takeaways) Abbey Arms (betting shops), Greengate (takeaways) and Plaistow Road (takeaways). Other known clusters of this type include those in Church Road, (takeaways) Albert Road, (takeaways) Pier Road (takeaways) and Fife Road (takeaways).

Generally the market and existing planning practice would seem to be to some extent self-limiting in respect of these types of clusters, as they are probably not as common as might be thought given overall numbers of hot food takeaways in particular.

Cumulative Impact in spatial terms

Cumulative impact noted in relation to betting shops and hot food takeaways is of 3 main types: amenity/anti-social behaviour related; town centre vitality/regeneration related; and behaviour related (lifestyle). Each manifest themselves spatially in different ways and could be said to have different thresholds.

Cumulative amenity/anti-social behaviour impacts

These include litter and noise, together with other anti-social behaviour such as intimidating congregations of people and associated interactions (fights), urination in the street, drug dealing, and spillover violence (in betting shops associated with perceived injustices of Fixed Odds Betting Terminals for example). These are all impacts commonly referred to in cumulative terms by local residents³ and Police and Council enforcement officers⁴, and clearly, the

² See e.g. policies/SPDs in Southwark, Sandwell, St Helens, Waltham Forest, Barking and Dagenham.

³ Via Members’ casework raising issues of concern, (ongoing); Youth council workshop Nov 2014; questionnaire surveys in Forest Gate (May 2014); Online Panel Survey re betting shops (May 2012), Scrutiny Committees 2009-11.

⁴ An association between takeaways (especially those providing late night refreshments) and the perception of crime has been documented in parts of the borough. These premises attract late night activity causing nuisance to the locality and a congregation point for groups of young adults. This adds to the problem already acknowledged locally in relation to late night-

impact of these will be magnified if several similar units, with similar patterns of use are found within a small area. For instance, where uses are more commonly patronised at night (both betting shops and takeaways) when other noise-generating activity reduces and most people are trying to sleep, the impact will be more noticeable, so several similar uses operating on these lines will further exacerbate the impacts experienced. Indeed, anti-social behaviour is particularly associated with the combination of these activities with alcohol consumption. Spatially therefore, proximity both on an area basis and within linear configurations is relevant.

Town centre vitality, regeneration and place-making – indirect impacts

Extensive engagement work⁵ that supported the Core Strategy identified several factors contributing to the tendency for people to leave the borough, (creating an exceptionally high rate of churn⁶); business and economic development difficulties (cf. success factors); and linked to these, poor health and well-being. These include crime and anti-social behaviour, a lack of aspirational and family-sized housing, a poor quality environment in various dimensions, and a poor quality and range of local facilities including schools and shops. At the borough-wide level, a very clear package emerges of what other boroughs (notably Redbridge) have which Newham doesn't: a good choice of family-sized housing, good schools, and quality town and local centres. At the town centre level, the equivalent (e.g. Wanstead cf. Forest Gate) is the assemblage of diverse retail, quality leisure and well-designed physical environments, plus aspects of individual distinctiveness. In both cases, it is not one standalone attractor that matters, but all of these inextricably linked, bound up in the image, impression and experience of the place created. As the Town Centre and Retail study (2010) points out, this situation is all the more unfortunate given the ongoing shift to more leisure-oriented town centres, and as the Economic Development Strategy notes, given the increasing importance of customer-facing businesses and the need to attract a foot-loose highly skilled workforce.

and alcohol- licensed premises, which is reflected in cumulative impact zones for licensing purposes a policy position that evolved following work such as the 2006-7 Night-time Economy Scrutiny Commission. In addition, joint enforcement work has found many takeaways to be effectively subsidising low prices by breaking employment, immigration and planning/housing laws, and breaching waste and hygiene regulations and agreements.

⁵ Including corporate surveys of residents, corporate focus group work, and LDF engagement at community events, with stakeholders and elected members, and through technical study surveys. See Newham Core Strategy Submission Documents – Consultation Statement <http://www.newham.gov.uk/NR/rdonlyres/06F7ADE6-5AD2-4503-BA51-8A5168B63013/0/Regulation301dStatementCoreStrategyStatementofConsultationMarch2011.pdf>

⁶ The Newham Housing Market Assessment 2010 (para 7.2) found that over one in every five households (20.9%) had moved within the last 12 months, and 8.9% having moved within the last two years. This compares to around one in seven households that move each year across the whole of London, therefore the turnover in Newham is higher than for Greater London

High levels of betting shops and takeaways impact on this both through direct impacts on crime and anti-social behaviour and environmental quality (as detailed above) and indirectly through associations people make with them and alternative ([perceived] more desirable⁷) businesses that they displace (opportunity costs, including failure to future proof). It follows that this impact is likely to be stronger the more visible and prominent the uses are within the street scene and local neighbourhood. To this end, linear frequency and numbers within 5 minute walk times (i.e. cluster definitions outlined above) can again be seen to be relevant to the assessment of impact. Indeed, the prevalence of such uses is frequently cited by local residents and expert advisers as the antithesis of what should be aimed for, and it is clear that in place-marketing terms, no one has ever thought it a good idea to market somewhere as 'having more betting shops per square mile' than anywhere else, or '19 takeaways on the doorstep'. In fact, recent reports in the professional and mainstream press concerning reviews by Mary Portas and Bill Grimsey into the future of the High Street, and campaigns by the Local Government Association, a coalition of local authorities under the Sustainable Communities Act and Mayor of London⁸ give further currency to the view that that increasingly, the proliferation of hot food takeaways and betting shops along high streets is off-putting and associated with decline and areas of deprivation, not high streets that are attractive or improving, reinforcing popular perceptions.

Behaviour-related impacts

The last impact of relevance is behaviour-related, whereby easy access to something makes use of it more likely. This is the long-identified 'propinquity effect' which has most recently been explored in relation to takeaways, where findings include for instance, that school pupils are most likely to purchase food from outlets within 400-800m of their school (or directly on their journey to school)⁹. The relevance of cumulative impact in this regard is that the more of a particular use there is, the more likely it will be close to a potential consumer and therefore used by them, and, as noted by the Newham Food

⁷ Other uses, whether retail, restaurants, cafes and other financial services, which have wider customer bases, and that may be more likely to encourage people to linger and make linked trips, and the outward face of which can contribute more positively to a sense of place and conviviality. It is not only crude footfall and spend on an individual unit basis that is sought, but the synergies brought about by a more careful blend of uses that people find convivial and attractive.

⁸ See e.g. Guardian (27.11.14) [Stop concentration of betting shops on high streets, say local authorities](#) ; Planning Resource (28.2.12) [Councils call for powers to halt betting shop 'clustering'](#) referencing the survey commissioned by the LGA of CommRes research, Feb 2012 see:

http://www.comres.co.uk/polls/LGA_High_Street_Research_Results_10Feb2012.pdf ; Planning Resource (18.10.11) [Boris Asks for Planning Policy Change to Rein in Betting Shops](#)'

⁹ See e.g. Sandwell MBC (2012) [Hot Food Takeaways SPD](#); Brighton and Hove City Council and NHS Sussex HA (2012) Hot-food takeaways near schools; an impact study on takeaways near secondary schools in Brighton and Hove' available at www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/Healthy_eating_Study-25-01-12.pdf ; School Food Trust. Take up of school lunches in England 2011-2012. London 2012.

Mapping Study (2010), the greater likelihood that consumer preferences (e.g. type of takeaway, price) will be met. Equally, price competition is likely to be downward where numbers are high, meaning products are within the reach of more potential consumers. These kind of impacts are increasingly accepted to be relevant in understanding the complex relationships between obesity, deprivation and numbers of takeaways, and between deprivation and betting shops, affecting healthy living and personal resilience agendas. All of these have been established to be relevant in Newham¹⁰. Furthermore, a number of studies have found casual linkages between concentration/proximity of fast food outlets and obesity.¹¹

Towards Policy Options

Numeric Thresholds

Appeal decisions, particularly concerning betting shops have indicated the importance of having numeric thresholds in policies to identify where cumulative impact becomes a problem, providing for certainty in the application of policy referring to cumulative impact (notably SP3, SP2). The above detailing of relevant cumulative impacts explains how numbers are relevant to the generation of impacts that extend in significance beyond individual premises; however, it is difficult to establish precise tipping points or thresholds without significant primary research.

Given that impacts are experienced and judged by people, engagement work is an important part of such research. The most relevant engagement work has directly broached the question of 'how many is too many?' and to date, 3 pieces of work have addressed this.

One was an online Panel Survey on Betting Shops conducted in May 2012 by the Council's research team, which generated 332 responses. The key findings here were that:

- Betting shops were seen in much more negative terms than other A2 uses (over two thirds of respondents thought they had a negative or very negative impact on their area, compared to a 6% for a solicitor's office)
- Almost half of respondents (48%) say they have 4 or more betting shops in their local area (within 5-10 minutes walk).

¹⁰ See HUDU (2013) Planning and Health: Using the Planning System to Control Hot Food Takeaways; NOO factsheet, (2012) Obesity and the Environment: Fast Food Outlets (www.noo.org.uk/uploads/doc/vid_15683_FastFoodOutletMap2.pdf)

¹¹ Tackling the Takeaways: A New Policy to Address Fast-food Outlets in Tower Hamlets <http://www.google.co.uk/url?url=http://www.towerhamlets.gov.uk/idoc.ashx%3Fdocid%3D2b285be6-9943-4fec-a762-76c93d07ca50%26version%3D-1&rct=j&frm=1&q=&esrc=s&sa=U&ei=BGlwVff6A8GsU7aDgYgM&ved=0CBQQFjAA&sig2=xO9YXmQeHNSv1IBOPMFPgA&usg=AFQjCNFs7aOHE9WfVsmafOHjUdFMOiwQ8Q>

- 79% of respondents (excluding 'don't know' responses) said they had too many betting shops in their local area. The large majority of these were respondents who had 4 or more shops.

Figure 7. Total number of betting shops in local area (%), by perceptions of acceptable level (%)

	Too many	Too few	Just right amount	Total
None	1%	1%	2%	4%
One	4%	0%	7%	10%
Two	10%	0%	5%	15%
Three	15%	0%	2%	18%
Four or more	46%	0%	1%	48%
Total	79%	1%	20%	100%
Total (count)	226	3	56	285

* Percentages may not add up due to rounding

- 71% of respondents agree '*the council should have more control over planning permission for betting shops*', whereas 9% thought levels were right and less than 1% agreed the '*council should have less control*' in this regard.
- 96% agreed that limits should be set for betting shop numbers locally, most commonly 1 or less.

Figure 8. Maximum number of shops that residents would like to see

Number of shops	Percent
No shops	23%
One	41%
Two	29%
Three	6%
Four or more	1%
Total	100%
Count	319

More recently, focused questionnaire research concerning betting shops was undertaken in Forest Gate, supported by maps to show what these kinds of spatial relationships could mean in the local area; 48 local residents responded. Most felt that clustering could be defined by there being 2 or more betting shops within 400m of each other, and most observed that in their local area there were at least 4 within 400m. In terms of future management, the most commonly cited desired maxima within a 400m area was 2 or less.

More limited open-ended engagement has also drawn the following observations of direct relevance to definitions of cumulative impact:

- That there should be 100m spacing between betting shops/takeaways to manage impacts (Youth Council, November 2014)
- Two hot food takeaways on Boundary Lane generate significant problems with litter on an adjoining street notably due to school children's consumption habits (email from resident of Finton Road, 2010).

- The opening of a 5th betting shop in Woodgrange Road is significant (email from local resident, 2009)
- That there are 5 betting shops in 500m on Green St is problematic (email from local resident 2012)
- Takeaways should be banned within 400m of schools (local residents' petition, 2010, 77 signatories).

This data can be supplemented by two further types of existing data:

- looking at cluster levels in areas noted by local residents and retail planning experts to have problematic numbers of such uses/associated impacts;
- looking at cluster levels in parts of the borough noted to be performing relatively well in relation to desired characteristics.

Area/ Centre	Betting shops a problem?	Takeaways an Issue?	Other relevant engagement data	2014 survey data re actual numbers
East Ham/ High Street North	<p>Several emails in 2013 mention their proliferation, alongside other 'undesirable' uses such as takeaways and money lenders.</p> <p>Retail consultants noted that leisure uses were below average in numbers, and that the offer, after takeaways, was dominated by betting shops (12% in 2010).</p>	<p>Frequently mentioned as such since records began (2009). One specifically referred to proliferation around Manor Park end of High Street North.</p> <p>Retail consultants noted that leisure uses were below average in numbers in the town centre, and that the offer was dominated by takeaways (33.3% in 2010). They also noted</p>	57.7% of 2010 consumer survey respondents never visit in the evening; only 1.8% visit for leisure purposes.	23 A5 in the town centre; on average each with 400m of 16 others, and within 800m of 39 others. 11 betting shops in the town centre, each on average within 400m of 7 others, and within 800m of 14 others. Together with amusement arcades, comprise c. 62% of leisure

Area/ Centre	Betting shops a problem?	Takeaways an Issue?	Other relevant engagement data	2014 survey data re actual numbers
		that in the East Ham North Local Centre, there were 'only 2' takeaways.		provision.
Green Street	Considerable local concern expressed particularly 2012 on, including a substantial local petition in response to a planning application in 2012.	Several references in email correspondence from local residents 2010-2013.	64.7% of consumer survey respondents never visit in the evening (2010). Cleanliness seen to be an issue by business respondents (2010). More negative perceptions about betting shops expressed from panel members in Green Street than some Neighbourhood areas (2012)	19 A5s in the town centre, each on average within 400m of 21 others and within 800m of 43 others. 7 betting shops in the town centre, each on average within 400m of 7 others, and within 800m of 12 others. Together comprise 68% of leisure provision.
Forest Gate	Email correspondence from local residents re nos in Forest Gate (2012)		Cleanliness and crime levels seen as issues of concern for businesses, plus lack of family-friendly eateries (2010 survey data).	15 A5s in the town centre, each on average within 400m of 14 others and within

Area/ Centre	Betting shops a problem?	Takeaways an Issue?	Other relevant engagement data	2014 survey data re actual numbers
			<p>More negative perceptions about betting shops expressed from panel members in Forest Gate than some Neighbourhood areas (2012)</p>	<p>800m of 27 others. 6 betting shops in the town centre, each on average within 400m of 6 others, and within 800m of 7 others. Together comprise 61% of leisure provision.</p>
Stratford	No direct references made.	Retail consultants noted in 2010 that takeaways comprised a significant component of the leisure offer (23%) and that only 1.6% of consumer survey respondents visited for leisure uses	<p>Cleanliness and crime levels seen as issues of concern for businesses (2010 survey data).</p> <p>More negative perceptions about betting shops expressed from panel members in Stratford & West Ham than some Neighbourhood areas (2012)</p>	<p>11 A5s in the town centre, each on average within 400m of 12 others, and within 800m of 30 others. 6 betting shops in the town centre, each on average within 400m of 5 others, and within 800m of 11 others. Together with amuseme</p>

Area/ Centre	Betting shops a problem?	Takeaways an Issue?	Other relevant engagement data	2014 survey data re actual numbers
				nt arcades comprise c.33% of leisure provision.
East Beckton	No direct references made.	No direct references made.	46% of consumer survey respondents never visit in the evening (2010). Lack of night time activity seen to be an issue by businesses (2010 survey) Less negative perceptions expressed re betting shops than in other Neighbourhood areas (2012).	No A5s in the town centre. 1 betting shop. Comprises 20% of leisure provision.
Canning Town town centre	No direct references made.	No direct references made	Visited in the evening by about 75% of consumers (2010).	6 A5s in the town centre; each on average with 10 others within 400m, 24 within 800m. 4 betting shops in the town centre, each on average within 400m of 3

Area/ Centre	Betting shops a problem?	Takeaways an Issue?	Other relevant engagement data	2014 survey data re actual numbers
				others, and within 800m of 6 others. Together comprise 55% of leisure provision.
High Street South, East Ham	No direct references made.	One reference to levels of concern in email correspon- den- ce.		2 A5 in Local Centre. No betting shops.
Abbey Arms, Barking Road	No direct references made.	Takeaways noted to cluster just south of boundaries by retail consultants (2010).	Barking Road referred to in 2013 email correspondence (local residents) as a problem area in relation to takeaways and betting shops (as well as money shops and Tesco's).	10 A5 units, within 400m of each other. 4 betting shops within 400m. Cluster of 3 betting Shops (next to and adjacent to each other)
Greengate, Barking Road	No direct references made.	No direct references made.	See above re Barking Road reference.	8 A5 in LC each on average within 400m of each other. 2 pairs of neighbour- ing A5 units along

Area/ Centre	Betting shops a problem?	Takeaways an Issue?	Other relevant engagement data	2014 survey data re actual numbers
				Barking Rd. 2 betting shops in the centre at the junction
Boleyn Local Centre, Barking Road	No direct references made.	Retail consultants noted that takeaways comprised 50% of service units in 2010.	See above re Barking Road reference.	3 A5 units within 400m of each other within LC. 1 betting shop.
Plaistow Road local centre	No direct references made.	Retail consultants referred to an 'overprovision' of cafes and takeaways in 2010.		3 A5 units within 400m of each other (2 with one shop unit between); 1 betting shop.
Freemasons Road local centre	No direct references made.	Retail consultants noted that there were 'only 2' in this local centre (2010).		2 A5 units within 400m; 1 betting shop
Manor Park local centre	No direct references made	No direct references made		No A5 units. No betting shops.
Terrace Road local centre	No direct references made	No direct references made		2 A5 Units within 400m. No betting shops.
Church Street local centre	No direct references made	No direct references made		No A5 units. 1 betting

Area/ Centre	Betting shops a problem?	Takeaways an Issue?	Other relevant engagement data	2014 survey data re actual numbers
				shop
Vicarage Lane E15 local centre	No direct references made	No direct references made		1 A5 unit. No betting shops
North Woolwich local centre	No direct references made	No direct references		No A5 units. No betting shops

Overall, both area and linear-based definitions of clustering and ‘critical mass’ thresholds, (particularly in relation to maintaining a proportion of leisure uses that are not takeaways/betting shops within a centre) can be seen as possible logical policy options. However, within this, a wide range of numbers appear to be contenders for appropriate thresholds, taking into account that it may be desirable to take a precautionary approach to ensure that in areas where such uses are not currently seen to be a problem, this situation is maintained.

It is notable for instance that direct questioning about numbers of betting shops in particular suggests very low numbers are seen as desirable local limits, (two or less) and even exclusion entirely. Equally, commonly used linear thresholds are rarely breached in Newham in relation to betting shops and takeaways (more than 2 in row or a gap of less than 2 between each) but could still be seen to be pertinent. Nonetheless, higher thresholds appear to be the triggers for local action – as in being so concerned that an email to a local councillor or petition is triggered (e.g. 5 in 500m in Green Street, a 5th betting shop on Woodgrange Road). Interestingly, in Stratford it seems that despite having broadly similar numbers of betting shops to Green Street and Forest Gate, complaints from local residents have not been generated. This may be because of the relative numbers – in Stratford takeaways and betting shops form a much lower percentage of the centre’s leisure provision (c. 33% cf. at least 60%).

It may also be the case that different thresholds are appropriate for different uses: tolerance of takeaways seems higher in relation to emails to councillors, (despite high absolute numbers of betting shops in all centres except East Beckton, correspondence focuses on East Ham, Forest Gate and Green St where numbers reach 15 or more) and some individual businesses have considerable local support (as per a recent petition against a change of use application of a takeaway to residential in Vicarage Lane, E6). Yet there also appears to be support for exclusionary policies ‘banning’ takeaways, particularly around schools.

Any such policy approaches need to be balanced against other policy objectives however, particularly the Government's objective of supporting consumer choice and ensuring appropriate levels of competition.

Positive Approaches - 'choice editing' and 'off-setting'

Another possible policy approach to cumulative impact issues is what has been termed 'choice editing'¹² whereby takeaways for instance, are permitted but policy levers are applied to encourage provision of healthier choices or cooking methods across the board. This is particularly relevant in relation to takeaways, but may also help tackle the fact that other outlets (e.g. convenience stores) also sell unhealthy food (and drink) and may help address the issue of ensuring consumer choice together with healthy urban planning objectives. This can also be deployed more proactively by others (e.g. Public Health, perhaps via Licensing) to influence the practices of existing takeaways, which far outnumber the number of new ones requiring planning permission.

Choice off-setting, whereby consents are balanced by payments to Public Health or say, gambling addiction support programmes that tackle impacts may also be relevant policy responses. The former is currently in operation in relation to takeaways in the neighbouring authority, Barking and Dagenham, requiring any new takeaways to pay an offset charge of £1000 to support relevant public health campaigns.

Conclusion and Recommendations

It is clear that both takeaways and betting shops are prominent commercial uses in Newham, and all the more so due to their clustering in small areas, with various types of impact, each of which have significant cumulative dimensions. These are of concern in relation various components of the strategic agenda (regeneration, economic, social and health convergence, resilience – personal and community) set by the Core Strategy and wider corporate documents¹³.

There are two possible avenues of planning policy that could strengthen existing ones concerning cumulative impact: positive approaches and numeric thresholds. It is recommended that both are explored as possible options in a variety of ways. Permutations might include for instance, a variety of numeric thresholds, and different ways of defining or preventing cumulative impact in spatial terms (e.g. linear clustering, area-based clustering; critical mass of other uses) and varied ways of defining particular places where more positive approaches might be deployed.

In general however, 400m appears to be a useful area based radius that makes sense in relation to people's experience (an average 5 minute walk

¹² See GLA (2012) Takeaways Toolkit

<https://www.london.gov.uk/priorities/health/publications/takeaways-toolkit>

¹³ See in particular, LB Newham (2012) [Resilience: Making it Happen](#); LB Newham (2013)

[Building Resilience: The Evidence Base](#)

time) upon which to base consultation options, whilst Lower Super Output Areas would be a more rigid equivalent. In terms of critical mass thresholds, 67% or two thirds 'quality leisure'¹⁴ would also seem to be a useful benchmark, though it may also be desirable to be more ambitious in relation to broader town centre visions. Seventy percent A1 uses in Primary Shopping Frontage could also be deployed similarly (see town centre boundaries evidence base document for assessment). The commonly used definition of linear clustering (more than 2 in a row, or without a separation distance of at least 2 other uses) should also be consulted upon as an appropriate precautionary measure.

Cumulative Impact Supplementary Evidence Base

Part 2: Active Travel Zones/ Public Transport Opportunity Areas

Policy Context

Air quality, climate change, accessibility and health all part of policy at a European, National, Regional and Local level.

SP2 seeks to promote healthy lifestyles, reduce healthy inequalities and create healthier neighbourhoods. It aims to improve air quality and to promote walking & cycling to increase people's activity rates.

INF2 seeks to secure more sustainable patterns of movement in Newham, maximising the efficiency and accessibility of the borough's transport network on foot, cycle & public transport in order to reduce congestions, enable development, improve the health fitness & well-being of residents and make necessary car journeys easier.

Method

The zones (approximate boundaries) are derived from mapping areas of very high public transport accessibility, (PTAL 6a or 6b representing 'excellent' as a benchmark) extensive provision of town centre facilities and low levels of car ownership/high levels of sustainable transport uses.

Analysis and Conclusion

Analysis of the 2011 Census data, details that in car ownership terms, the opportunity areas to promote active travel are, Stratford (& New Town), West Ham, Canning Town (around the station) and East Ham Central which have existing higher levels of sustainable transport usage and low car ownership around Town Centres and public transport stations. This is further supported in that PTAL levels in these areas are 'Excellent' with regards to access to sustainable modes of transport. Further to this Stratford, Canning Town & East Ham were each identified with traffic congestion hotspots at key junctions, in which active travel policies would seek to improve air quality and mitigate.

¹⁴ D2, A3, A4 uses cf. amusement arcades, betting shops and A5 uses.

The below table outlines the level of car ownership per ward with the approximate PTAL level, which generally coincide. Where the PTAL Level is 'Excellent' and levels of car ownership are low, there are opportunities to promote active travel in these areas.

Ward	Car Own (access to one or more car or van % of households 2011 Census)	Public Transport % 2011 Census	Forum Area	Approx PTAL
Stratford & New Town	36.3	71.53	Stratford & New Town	6a/b
Canning Town North	41.96	58.97	Canning Town & Custom House	6a
Canning Town South	42.65	64.70	Canning Town & Custom House	6a
Forest Gate South	43.23	61.36	Forest Gate	3/4
West Ham	43.87	64.65	Stratford & New Town	6a
Plaistow North	44.62	60.24	Plaistow	3/4
Little Ilford	46.43	46.11	Manor Park	5/6
East Ham Central	47.62	56.49	East Ham	6a
Plaistow South	47.74	54.39	Plaistow	3/4
Borough Wide Average	47.94	63.08		
Boleyn	48.09	55.46	Green Street	3/4/5
Forest Gate North	48.78	61.04	Forest Gate	3
Green Street East	49.15	57.27	Green Street	
Green Street West	49.56	56.76	Green Street	
East Ham North	51.01	57.73	Manor Park	3/4/5
Manor Park	51.15	53.13	Manor Park	3/4
Wall End	54.18	55.46	East Ham	1a
Custom	54.49	53.85	Canning	1/3

House			Town & Custom House	
Royal Docks (Ward+CF)	54.55	66.80		1a
East Ham South	55.28	48.22		1a

% of Modal splits per Ward (Census 2011)

