Examination in Public of the draft London Plan:

Written Statement from London Food Link, Sustain to the EIP Panel February 2019

Ref ID 821

Matter M91 Hot Food Takeaways

About Sustain: the alliance for Better Food and Farming

Sustain advocates food and agriculture policies and practices that enhance the health and welfare of people and animals, improve the working and living environment, enrich society and culture and promote equity. We represent around 100 national public interest organisations working at international, national, regional and local level. We work with our members and others to promote integrated healthy and sustainable policies and practices for food, farming and fishing. Sustain coordinates a number of projects across the UK, some with a focus on London, which have informed our position within this response:

- **Planning Food Cities:** works with local areas across the UK, particularly in the 50+ strong Sustainable Food Cities network, to use the planning system to help create a more sustainable local food environment. Our SUGAR SMART and Food Power programmes also work with many of these local areas to provide complimentary support to improve access to healthier affordable food over less healthy alternatives.
- **The Local Government Declaration on Sugar Reduction and Healthy Food:** is an initiative that we promote to support local authorities in London and beyond to use the direct powers, or indirect influence, they have on these issues relating to advertising, sponsorship, public events, food procurement, business support, planning, and public information.
- **London Food Link:** is our network of hundreds of London organisations working for a healthy, sustainable and ethical food system for the capital. We strive for a food system that benefits all Londoners through our projects and campaigns, including our Beyond the Food Bank and Good Food for London reports which measure local authority commitments to tackle food poverty and support good food initiatives, respectively.
- **Children's Food Campaign:** focuses on the rules and standards that hold business to account for the quality of the food sold, served and marketed to families and children, and notably helped push for a sugary drinks tax, for junk free checkouts in supermarkets, for improving the standard of food being served in schools, and for food education being put back on the curriculum and the introduction (and continuation) of universal infant free school meals, as well as setting up a Parents' Jury for the UK.

Sustain welcomes Policy E9 covering hot food takeaways (and other food retail issues). We expand on our support and comment on the matters raised.

a) Is the development of hot food takeaways and associated planning conditions a matter of strategic importance to London, or a detailed matter that would be more appropriately dealt with through local plans or neighbourhood plans?

Yes, we believe this is an issue of strategic importance in light of the well documented child obesity crisis across the capital (and more broadly the UK). We believe that different options should be explored, including planning controls, to restrict the spread of obesogenic environments and the proliferation of hot food takeaways.

A strategic approach through the London Plan would allow each council to draw on national and London evidence and the 2018 NPPF and not be required to repeat this when challenged through the local plan making process.

The TCPA is calling for "*partners in local planning and health systems should work together to adopt a clearly defined set of priorities and an integrated approach to planning for health and wellbeing, starting with local representative bodies of the health system to ensure that their respective delivery plans and strategies are aligned'.*[1]

The Government's 2016 report "Childhood obesity: a plan for action"[2] outlines the actions the government will take towards its goal of halving childhood obesity and reducing the gap in obesity between children from the most and least deprived areas by 2030. It states that "Local authorities have a range of powers and opportunities to create healthier environments. They have the power to develop planning policies to limit the opening of additional fast food outlets close to schools and in areas of over-concentration." (Section 4, p24). This is in the context that *"Challenges vary across local areas but many local authorities face common issues, including a proliferation of fast food outlets on high streets and near schools; less active travel; limited access to green spaces and physical activity; and unhealthy food marketing dominating many public spaces. These factors create an environment that makes it harder for children and their families to make healthy choices, particularly in some of our most deprived areas." (Section 4, p24).*

In 2018, the Commons Health and Social Care Select Committee published the Government response[3] to its follow up report on childhood obesity. It reiterates the Government's ambition to halve childhood obesity and to reduce the gap in obesity between children from the most and least deprived areas significantly by 2030. It also reiterates the Government's commitment to reviewing what more can be done and, where progress is not being delivered, to being willing to consider what further action can be taken to tackle childhood obesity successfully. It comments on a whole systems approach, food marketing and advertising, price promotions, early years and schools, takeaways, fiscal measures, food labelling and support for children living with obesity. We also refer to Public Health England, (2018) "Obesity and the environment: regulation the growth of fast food outlets"*,* and Public Health England, (2018) "Healthy High Street: good place making in an urban setting"[4].

The planning system is one area in which local government can act to make the food environment a healthier one for our children and young people. One of the important messages from the Joint LGA/TCPA publication, "Tackling obesity through planning and development"[5] is that to create this healthier environment local government must work at many levels with many sectors and partners and with communities. A healthy food environment is one of six elements of a healthy weight environment over which planning can have a positive influence.

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[1] https://www.tcpa.org.uk/blog/the-state-of-the-union-reuniting-health-with-planning

[2] https://www.gov.uk/government/publications/childhood-obesity-a-plan-for-action
[3] https://www.parliament.uk/documents/commons-committees/Health/Correspondence/2017-19/Childhood-obesity-Government-Response-eighth-report-17-19.pdf
[4] https://www.gov.uk/government/publications/childhood-obesity-a-plan-for-action-chapter-2

[5] https://www.local.gov.uk/sites/default/files/documents/building-foundations-tack-f8d.pdf

b) What evidence is there indicating high levels of obesity, deprivation and general poor health in London?

The evidence for obesity and diet related disease, particularly worryingly amongst children, is well documented and evidenced in much documentation the Mayor has produced, including the London Food Strategy (2018) and London's Health Inequalities Strategy (2018). The link between poor health and deprivation is also well documented in these.

The following findings paint a picture of the state of London in these respects: One in three London children are overweight or obese by the time they start secondary school; More than 3.8 million Londoners are overweight or obese; 37% of children in London live in poverty[6]; At least 70,000 children in London go to bed hungry 'sometimes or often'[7]; 722,000 London workers (around 20%) earn less than the London Living Wage[8]; 134,244 emergency food parcels were given to Londoners by Trussell Trust food banks in 2017 – 18[9]; and 25% of London's children are at risk of going hungry during the school holidays[10]. One element of these health problems is a lack of access to affordable healthy food, and an overabundance, particularly in poorer neighbourhoods, of outlets selling food that is high in fat, salt and sugar.

Our own research has documented London's local authorities' mixed progress on using what powers they have to tackle these linked problems of malnutrition and poverty. Commitments by local authorities to measures supporting a good food system (by which we mean good for health, the environment, and economy amongst other concerns) have risen in the past eight years, with 32 of 33 boroughs increasing their commitments to voluntary schemes[11], with almost half of London's boroughs having launched a SUGAR SMART campaign or signed the Local Government Declaration on sugar reduction and healthy food.

But whilst some are taking great steps, this masks the reality that some of the more meaningful, and expensive, measures to improve the health of their citizens are being cut by cash-strapped local authorities. For example, one third of London councils surveyed in 2018 provided some form of meals on wheels service, down from two thirds in 2016, with no alternatives being provided for users who are amongst the most vulnerable[12]. At the other end of the age spectrum, thousands of children in poverty are ineligible for free school meals. This inability to provide the neediest and most vulnerable with a healthy meal, means more have to turn to cheap and accessible alternatives which, in the case of most hot food takeaways, are often dominated by less healthy options, a situation which is exacerbated if this is the only food that these citizens can regularly access.

Some local authorities still do not prioritise tackling food poverty, despite the powers they have to alleviate the predicament that their residents are in. Approximately a third of London boroughs have failed to fill in our London Food Poverty survey two years running, which speaks as much to their lack of capacity as it does to their commitment. The result is the same however. This is why tackling malnutrition and poverty needs a London-wide

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[6] Child Poverty Action group Website www.cpag.org.uk/campaigns/child-poverty-london/keyfacts

[7] Child Hunger in London: Understanding Food Poverty in the Capital (2013) https://www.ipsos-mori/en-uk/child-hunger-london

[8] CPAG and the Living Wage Foundation (2017) Moving to the London Living Wage: A Guide for local authorities in London http://www.cpag.org.uk/content/moving-london-living-wage-guide-local-authorities-london

[9] www.trusselltrust.org/news-and-blog/latest-stats/end-year-stats/

[10] Mayor of London (2018) Assembly supports extending hilday clubs to beat hunger, https://www.london.gov.uk/press-releases/assembly/assembly-supports-extension-of-holiday-clubs

[11] Good Food for London, Sustain, https://www.sustainweb.org/londonfoodlink/goodfoodforlondon/

[12] Beyond the Food Bank, Sustain, https://www.sustainweb.org/foodpoverty/profile/

approach, which includes additional powers and support to reduce the proliferation of hot food takeways, in order to reduce the postcode lottery of citizen's prospects.

We are not only concerned by the current situation, but the potential for further exacerbation of these problems if not considered within London's future growth and development. The London Plan is shaping the future of London and we do not want it to be an obesogenic city with people living in food poverty and communities not having access to healthy food.

c) What evidence is there of over-concentration and clustering of hot food takeaways in London?

The **Food environment assessment tool (Feat)[13]** has been developed by CEDAR and the MRC Epidemiology Unit at the University of Cambridge. It allows for detailed exploration of the geography of food retail access across England. *Feat* is underpinned by the latest scientific evidence about how food access in our neighbourhoods affects our dietary choices, body weight and health. It allows users to map, measure and monitor access to food outlets at a neighbourhood level, including changes over time. It is designed around the needs of professionals in public health, environmental health and planning roles, locally and nationally and can be used to:

- Generate local evidence for use in the development of Obesity Strategies, Local and Neighbourhood Plans, JSNAs and Strategic Planning Documents.
- support planning decisions
- compare food access between neighbourhoods, and see where is changing fastest
- target interventions, and test the effectiveness of planning policies

Sustain is looking for councils to take action before an over concentration occurs although research e.g. in Tower Hamlets, indicates the seriousness of the problem already.[14]

d) Would restricting development of hot food takeaways within 400 metres walking distance from the entrances and exits of existing and proposed primary and secondary schools positively support the delivery of policy GG3 "creating a healthy city"?

The evidence suggests that similar policies have led to a reduction in the increase in these outlets, but that the numbers are still increasing. So whilst it is a useful tool, it may be that additional measures are needed. Another planning measure which a council can take is to control hours of opening. This allows the use to be available in the evenings. Councils which are concerned to avoid empty shops, lose business rates, employment or damage the night time economy have used this technique. In addition to the regulation of hot food takeaways around schools, Barking and Dagenham applies a fixed fee of £1000 to be levied on successful applications. This is designed "to mitigate the impact on the health of their customer" and will be spent "exclusively on initiatives to combat obesity which will be identified in partnership with NHS Barking and Dagenham".

The table below summarises our research into the variations in the extent of the exclusion zone and other measures included in local planning policies on hot food takeaways.

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[13] https://www.feat-tool.org.uk/
[14] https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/Evidence-base/A5-Takeways.pdf
http://openaccess.city.ac.uk/3392/1/The%20School%20Foodshed.pdf

	Gateshead	St. Helens	Newcastle	Salford	Barking and Dagenham	Sandwell
Exclusion Zone (EZ)						
400m EZ (Secondary schools)	✓	✓		✓	✓	✓
400m EZ (Primary schools)		✓			✓	
400m EZ (Sixth form colleges)		✓				✓
400m EZ (youth/leisure/parks)	✓					
Travel Time-based EZ (secondary schools)			✓			
Town centre exclusion zone exemption	✓	✓	✓	✓	✓	✓
Other measures						
Fixed fee					✓	
Promoting healthier Hot Food Takeaways				✓		

We support the inclusion of primary schools within the proposed policy. Children who are already obese by secondary school age are likely to be at risk of health problems into adulthood; children will already have been addicted to foods high in fat, sugar & salt by the time they get to secondary school. Some similar policies also include other settings where young people meet. For example, Blackburn and Darwen council's policy covers primary or secondary schools, madrassas, nurseries and tertiary colleges[15].

Retail policies and policies to support local centres should not rely on hot food takeaways to fill empty shops. We would encourage the London Plan to clarify that Local plan policies which support local retail centres will not allow hot food takeaways in a defined shopping centre within the 400m exclusion zone policy to be available at times that young people are travelling to or from schools/youth centres. This is a weakness in many policies (see table above), and we would encourage the Mayor and local authorities to investigate whether such restrictions on opening times would be appropriate, or could even be implemented to existing outlets.

Policy E9 supports the promotion of the Healthier Catering Commitment, as promoted in the Mayor's London Food Strategy. (see Examination library ref NLP/EC/018) This policy shows planning control is part of a health and food agenda and how control of new Hot Food Takeaways works in tandem with other measures. For example, planning can't regulate what other shops or food outlets sell. Other types of regulation such as food standards or licensing could be mentioned.

Councils should have integrated policies to avoid new obesogenic environments being developed. We would encourage the Mayor, through the guidance associated with this policy, to suggest that boroughs evidence their local proposals for such policies through the use of a package of complimentary powers and measures to challenge obesogenic

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[15] http://www.blackburn.gov.uk/planningdocs/SPD/Planning%20for%20Health%20SPD%20-%20ADOPTED.pdf

environments e.g. locally relevant initiatives/priorities. If they only use this one (planning) policy, its effectiveness could be challenged.

Evidence could include maps showing areas of food poverty, walking distances from school entrances, local shopping parades, location of units with planning consent for take away shops, impact of the policy on remaining retail units (has the area already reached capacity?), survey of nutritional standards of takeaways, study of children's eating habits, etc. A School Health Related Questionnaire created through cooperation with Newcastle council and the NHS to establish children's eating habits is carried out on a biennial basis in both primary and secondary schools in the city.

We would also encourage the Mayor, through the guidance associated with this policy, to suggest that boroughs ask for health impact assessments on planning applications for new takeaways and use the FEAT tool to inform their recommendations and ultimately decisions.

A question often posed is "Is fast food unhealthy food?" Gateshead council has looked into this. A study of the nutritional value of various foods from all 200 hot food takeaways in Gateshead found that all the takeaways in Gateshead were selling unhealthy food.

Prepared by Ben Reynolds, Deputy Chief Executive

Replies to:

Sarah Williams Programme Director, Sustain

sarah@sustainweb.org

www.sustainweb.org