



## **Submission to Haringey Council consultation on main modifications to Haringey Local Plan**

**13 January 2017**

### **Re: restrictions on the siting of new hot food takeaways**

*Summary: we support the reinstatement of the original policy proposal and original wording which was deleted / amended in Policy DM47 after the Examination in Public (DMMod100 to DM Mod106).*

Children's Food Campaign aims to improve children and young people's health by campaigning for policy changes in our schools, in our communities and throughout our society that would promote healthy and sustainable food environments. The Children's Food Campaign is supported by over 100 UK-wide and national organisations, including public health professional bodies, trade unions, school food experts, children's charities and environmental groups. We are a campaign of the charity Sustain: the alliance for better food and farming.

We have not previously responded to the consultation on the Haringey Local Plan because we were satisfied that the draft policy would help use the planning system in an appropriate way to help address health inequalities and tackle rates of diet-related ill health in the Borough. We represent a campaign with limited resources and therefore only respond to consultations where there is a policy deficit.

Unfortunately, in this case there is a clear policy deficit which has emerged. We are concerned that the proposed post-Hearing modification results in a planning policy which abdicates responsibility of Haringey Council to use its planning powers to address serious health issues, contrary to the National Planning Policy Framework on planning healthy communities.

We believe that the proposed modifications will make the Plan unsound because it disregards the local public health data of 2012 and 2016 which clearly demonstrates health inequalities in the borough. The updated 2016 map should be reinstated.

We believe that the proposed modified policy will not address this issue because the wording is vague and incapable of implementation. The 400m distance is a well regarded figure for walking distances to facilities as a proxy for the length of time it takes to walk to reach food outlets. The inspector will be interested in the following research: [http://webarchive.nationalarchives.gov.uk/20150116162451/http://www.obesitywm.org.uk/resources/JMP\\_Executive\\_Summary.pdf](http://webarchive.nationalarchives.gov.uk/20150116162451/http://www.obesitywm.org.uk/resources/JMP_Executive_Summary.pdf)

The London Food Poverty Profile 2016 shows the interventions being made in each borough across London. One of the maps shows what boroughs are doing to improve physical access to good food and this includes Haringey's action to adopt appropriate Local Plan policies as part of a suite of measures to address health and food poverty. (Beyond the Food Bank, Sustain 2016, [https://www.sustainweb.org/publications/beyond\\_the\\_food\\_bank\\_2016/](https://www.sustainweb.org/publications/beyond_the_food_bank_2016/)).

The modified Plan no longer meets the best practice – and Inspector-approved – planning policies of other London boroughs with similar levels of deprivation, obesity rates and hot food takeaway provision.

The initial proposed policy restrictions on A5s met with the test of soundness and fairness, because hot food takeaways are far more likely than A1 or A3 uses to offer specific promotions to school children. Indeed, we have only ever seen or heard about special offers only available at lunchtime and in the immediate after school period (say 3-5pm) from hot food takeaways - especially the independently run or franchised 'chicken and chips' shops. That type of specific targeting of school children to encourage the purchase of high fat (and often high salt and high sugar) meals just does not happen in another retail environment, or even in an eat-in only business.



For these reasons, we are thus calling for the reinstatement of the original wording and the original policy proposals on restrictions for granting permission for new A5s, including that they should be 400m from a school.

Malcolm Clark  
Co-ordinator, Children's Food Campaign

Sustain: The alliance for better food and farming  
Development House, 56 - 64 Leonard Street, London EC2A 4LT  
Tel: 020 7065 0902 Mobile: 07733322148  
Email: [malcolm@sustainweb.org](mailto:malcolm@sustainweb.org) Web: [www.childrensfood.org.uk](http://www.childrensfood.org.uk)

**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, promote equity and enrich society and culture.