



LONDON HEALTHIER HIGH STREETS

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London Healthier High Streets
C/o Southwark Public Health
Southwark Council
160 Tooley Street
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11th January 2017

Dear Sir / Madam

Re: Consultation on the Inspector's Main Modifications to the emerging Haringey Local Plan

The London Healthier High Streets Network considered the above consultation at its meeting 12th December 2016. This letter is a summary of the discussion.

We are disappointed with the proposed changes relating to the policies for hot food takeaways (DM47). Specifically, our concerns regard DMMod100-104 and the amendment to the first sentence of paragraph 6.60 which removes the management of hot food takeaways around primary and secondary schools.

- Local data evidence:
 - The latest National Child Measurement Programme (NCMP) found that nationally, regionally and locally overweight and obesity among children is rising. In Haringey, overweight and obesity rates have risen by 1.2% among Reception year children and 0.8% among Year 6 children between 2014/15 and 2015/16.
 - A mapping of fast food outlets in Haringey shows an over concentration of fast food outlets almost exclusively in the deprived east of the borough. The borough was also identified by the National Obesity Observatory to be in the top quintile of local fast food outlet concentrations. This inequality was further highlighted in a recent report by the Royal Society of Public Health which showed that Haringey was the only borough in London to be placed in both the top ten healthiest high streets and the top ten unhealthiest high streets. In addition, the RSPH recommended a threshold of 5% to manage clustering. Ref: Royal Society of Public Health, *Health on the High Street*, 2015
- NPP consistency - The 400m zone to restrict further fast food outlets around schools is consistent with National Planning Policy which recognises that health considerations are an important part of planning policy. In particular, the Local Plan should promote health and wellbeing and support the reduction of health inequalities; take into consideration the local

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health and wellbeing strategy and other relevant health improvement strategies; and support healthy lifestyles. Ref: <https://www.gov.uk/guidance/health-and-wellbeing>

- Removing the management of hot food takeaways around schools will undermine key Haringey health strategies and approaches to healthy weight including their healthy schools work
- ***Evidential studies*** - Increasing access to healthy foods while also limiting access to unhealthy foods are ways that local authorities can influence environmental factors that affect health and wellbeing, including weight gain and obesity.
 - Haringey Council's approach to regulating planning permission for takeaways and other food retail outlets in specific areas including within walking distance of schools, is in line with recommendations from NICE (National Institute for Health and Care Excellence) and PHE.
 - The latest evidence published in the British Medical Journal shows that those exposed to takeaway food outlets in home, work and commuting environments is associated with higher consumption of takeaway food, greater body mass index, and greater odds of obesity . Ref: Burgoine T, et al. *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)

Having considered the proposed changes, the Healthier High Streets Network strongly believes that the following should be re-instated in the Haringey Local Plan:

- **Healthy Eating Zones - (DMMod100)**
- **The council will resist proposals for hot food takeaway shops located within 400 meters of the boundaries of a primary or secondary school - (DMMod101)**
- **The percentage of hot food takeaway shops will not exceed 5% of designated shopping frontage in the Metropolitan and District Town Centres and local centres - (DMMod102)**
- **Within neighbourhood parades, other non-designated frontages and elsewhere in the borough – (DMMod 102)**
- **Particularly around primary and secondary schools where they pose a significant health risk to children (DMMod104)**

We look forward to our response being positively considered. The Network and members are happy to be invited to provide further comments and evidence should that be required.

Yours faithfully



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for Southwark



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Joint Chairs of London Healthier High Streets

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