



Chartered
Institute of
Environmental
Health

Addressing the health impacts of hot food takeaways

Response to draft for public consultation from the London Borough of Barking and Dagenham

October 2009

The Chartered Institute of Environmental Health

As a **professional body**, we set standards and accredit courses and qualifications for the education of our professional members and other environmental health practitioners.

As a **knowledge centre**, we provide information, evidence and policy advice to local and national government, environmental and public health practitioners, industry and other stakeholders. We publish books and magazines, run educational events and commission research.

As an **awarding body**, we provide qualifications, events, and trainer and candidate support materials on topics relevant to health, wellbeing and safety to develop workplace skills and best practice in volunteers, employees, business managers and business owners.

As a **campaigning organisation**, we work to push environmental health further up the public agenda and to promote improvements in environmental and public health policy.

We are a **registered charity** with over 10,500 members across England, Wales and Northern Ireland.

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1. Introduction

- 1.1 Tackling obesity and promoting healthy eating is high on the public health agenda. The Chartered Institute of Environmental Health (CIEH) has, for some time, been working to support the need for improvement through a range of mechanisms such as publishing reports¹, introducing toolkits², supporting healthy eating awards^{3,4} and more generally seeking to identify areas where EHPs can develop and promote interventions.
- 1.2 A key focus for the Government agenda is tackling obesity and the recent launch of Change 4 life has further identified the pressing need to address the increasing problems amongst the young. This is the most recent strategy for addressing health and diet in children, with targets beyond school eating
- 1.3 Within schools, the introduction of nutritional standards is beginning to drive change but there is considerable work to be done in reducing consumption of foods high in fat, salt and sugar amongst this age group. The proliferation and proximity of hot food takeaways to schools are therefore of concern as the food they serve is often high in fat, salt and sugar. Healthier options, if available are generally very limited.
- 1.4 Concern about the proliferation of these premises was confirmed in the recent obesity strategy for England "Healthy Weight; Healthy Lives"⁵ which indicated opportunities for local authorities to control the establishment of fast food outlets through planning powers. This document also identified the Thames Gateway as being an area which should work to reduce the levels of obesity.
- 1.5 The CIEH therefore welcomes the steps that Barking and Dagenham are taking in this area by producing a supplementary planning document to control the numbers of hot food takeaways in their borough.
- 1.6 It should of course be noted, that this document will not reduce the numbers of premises already operating under an A5 use class category, but will aim to restrict new premises opening except in designated areas. We consider therefore that it is essential that work is done with existing premises to help them improve their menu offerings and in turn, provide the consumers with more choice.
- 1.7 In submitting this response, the CIEH will deal with the points contained within the SPD in turn.

2. SPD Implementation Point 1 – Proximity to Schools

- 2.1. The CIEH supports the provision of an exclusion zone of 400m around the boundary of a primary or secondary school in the borough.

¹ Purdy J; McFarlane G; Harvey H; Rugkasa J; Willis K (2007) *Food poverty and policy in Northern Ireland*

² Eat clever toolkit.

³ Healthy options award. CIEH (Wales)

⁴ Heartbeat Award

⁵ HM Government (2008) *Healthy Weight; Healthy Lives: A cross-government strategy for England*. Department of Health; Department for Children, Schools and Families. London

- 2.2. We note the comments that it is not necessary to implement a further zone around parks, children's centres and leisure centres as they will be encompassed by the school zones. We consider that it may not be sufficient as there are some leisure and children centres which are close to the border of the zones, meaning that an outlet could open up nearby creating an undesirable situation.
- 2.3. We consider that this point in particular must be kept under review to ensure that the SPD is effective and achieves its maximum potential.

3. SPD Implementation Point 2 – Concentration and Clustering

- 3.1. The CIEH supports the steps that Barking and Dagenham are proposing to take in this area to ensure shopping areas are diverse and balanced and that the cumulative impact of hot food takeaways is considered when determining applications.
- 3.2. We also consider that it will be necessary to ensure these new restrictions around concentration and clustering are incorporated into other strategic planning documents in the borough where a greater maximum is already specified (such as the Borough Wide Development Policy). This is necessary to ensure that a cohesive plan exists in the borough which cannot be challenged by applicants.

4. SPD Implementation Point 3 – Hot Food Takeaway Levy

- 4.1. The CIEH supports the principle of a levy of £1000 where a hot food takeaway is deemed appropriate.
- 4.2. We would wish to see however more detail on how this levy is to be used, and what measures will be used to gauge effectiveness of this particular element of the SPD. We note that there are a number of strategic working initiatives taking place and consider that it is key that they are linked up together to ensure maximum effectiveness.
- 4.3. We would in particular like substantial support for businesses operating in this sector to improve their menu offerings. We consider that restricting access to this type of businesses is only one tool and that it is important to consider this in the context of other work that can occur which both will support business during this challenging time, but also to help consumers make more informed choices.
- 4.4. We would also like to see that funds from the levy are used not only for promotion of physical activity, but also used to support initiatives such as fresh food co-ops. We note the comments in the SPD that the Thames Ward was ranked as one of the worst food deserts in London and consider that funding could be used to help address this.
- 4.6. By using a multi faceted approach to deal with obesity and associated ill health, we consider that the greatest benefit can be achieved from initiatives such as these.

5. Monitoring, Implementation and Review

- 5.1 We note the comments that it is essential to check that the SPD is working correctly, and agree that action will need to be taken if this is not found the case. This should include monitoring of other similar classes to ensure that they are being correctly used by businesses if A5 is restricted. There is an obvious possibility that the A3 class in particular may be misused within the exclusion zone and children may be exposed to the type of food which the SPD is trying to restrict.
- 5.3 We note that success will be measured against a set of indicators and that possible indicators are listed in the SPD. We would however caution that it may be difficult to monitor effectiveness of the SPD using the suggested indicators, as they may be beyond the control of the SPD.
- 5.4 For example, the SPD itself does not directly deal with the provision of fruit and vegetables, so the outcome of children eating 5 or more may well be unrelated.
- 5.5 We would suggest therefore that the monitoring indicators are restricted to those which actually are influenced by the SPD, such as number of new A5 premises applying and outcomes.

6. Conclusion

The CIEH welcomes this supplementary planning document and supports the London Borough of Barking and Dagenham in using this to help control the numbers of hot food takeaway outlets in its borough.