



Food Newcastle
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Submission of evidence to the consultation on Newcastle City Council's Hot Food Takeaway Supplementary Planning Document (SPD) scoping report

Abbreviations list:

FFT – Fast Food Takeaway
HFT – Hot Food Takeaway
CFT – Cold Food Takeaway
LA – Local Authority
EHO – Environmental Health Officer

Food Newcastle welcomes the opportunity to submit a response to the consultation on Newcastle City Council's Hot Food Takeaway Supplementary Planning Document (SPD).

About Food Newcastle

The Food Newcastle partnership brings together everyone with a passion for creating a healthier food culture in Newcastle. We are an umbrella organisation, engaging with organisations and individuals from across all sectors on a number of projects connected to food. Together, Food Newcastle members are making healthy, fresh, local and seasonal food a defining characteristic of our city.

The Newcastle Food Charter publicly conveys the partnership's five main aimsⁱ. To date over 70 organisations and individuals have pledged to take action in support of these locally important priorities related to food. The Food Charter is supported by a delivery strategy which is intuitively organised around *increasing demand* through connecting people with good food and *shifting supply* by addressing procurement, food waste and the environmental sustainability of the food supply chain which feeds Newcastle.

Food Newcastle is a member of the UK wide Sustainable Food Cities Initiativeⁱⁱ. A network of over forty UK cities who recognise the pivotal role of food in addressing key societal challenges such as obesity, climate change, community cohesion and food poverty. The network helps places to share challenges, explore practical solutions and develop best practice on important food issues.

Food Newcastle is grateful to its current funders for supporting this work: Public Health Newcastle and the Esmee Fairburn Foundation.

Format of the submission

This response will first consider a few points directly linked to the restriction of A5 premises. The second part will consider a number of additional policy responses to the over proliferation of Hot Food Takeaways (HFTs). The third and final part of the submission will consider this consultation within the wider food and health landscape and suggest a number of activities that should be embraced to compliment and strengthen the introduction of a HFT SPD.

Part 1 – restriction of A5 premises?

In 2010 HFTs hit the headlines when a number of London Boroughs introduced new approaches to planning regulation. This was an attempt to try and control the proliferation of HFTs near schools and sparked much debate, eventually leading to a number of high profile legal challenges. In the UK, the Takeaways Toolkit (2012)ⁱⁱⁱ was created in response to these debates. The intention of the Toolkit was to help local authorities and their partners understand the issues around, and reasons for, focusing on HFTs as a means of addressing public health issues and increasing community health and wellbeing. Aside from considering public health factors it is important to consider wider environmental, socio-cultural and economic factors in relation to HFTs.

A study in 2011 found that FFTs play an important role in providing culturally acceptable social space for local Muslim communities through the provision of halal food in an alcohol – free environment. The study also pointed out the important of understanding particular local sensitivities when developing sustainable policy interventions.^{iv}

It is a recognised weakness that planning policy can be a rather blunt instrument to employ in an effort to tackle complex problems such as obesity and health inequality. Limiting the number of new HFTs could inadvertently consolidate the market position of pre-existing HFTs. In addition, there is currently no available mechanism for distinguishing between ‘healthy’ and ‘unhealthy’ HFTs and as such, all HFTs, healthy or otherwise, will be uniformly affected by a restrictive SPD policy.

There is emerging evidence to suggest that restricting HFTs on the basis of proximity to schools may be failing to prompt the anticipated impact of reducing out of home hot food consumption amongst school children. School children have been found to walk a considerable distance from the school gate in order to access food from a HFT, sometimes on their journey home. We question where restriction zones in the region of 400 meters from the school gate will lead to any measurable impact on the dietary behaviours of school children.

It is unlikely that the restriction of HFTs will have any marked impact on the overall availability of healthy and affordable food within neighbourhoods. Without complimentary work to improve access to good food, particularly in areas that currently experience high levels of health inequality, will there be any marked

change in overall dietary patterns? Whilst a SPD may present a relatively ‘quick win’ in the bid to tackle obeseogenic environments, interventions that support long term, sustained population level behaviour changes are needed in order to demonstrate a strong level of LA commitment to tackling the problem.

Part 2 – further policy recommendations

Could Newcastle LA ‘Choice Edit’ menus in new HFTs?

‘Choice editing’ is a way of removing products that could have a negative impact on consumers health. The Takeaways Toolkit (2012) states that Local Authority planners could theoretically employ choice editing by granting planning permission only to hot food takeaways that comply to certain nutritional criteria for the products they sell e.g. by restricting the calorific values of portions of food or the percentage of fat in food products. The toolkit goes on to say this type of intervention remains controversial and that they are not aware of any examples where it has been implemented. Frustratingly, there is no further information or guidance. The SDC (2006) suggest choice editing for sustainability by government and business can cut out unnecessarily damaging products for consumers and get healthier and more sustainable choices (SDC 2006).

Take action on Trans-fats: Learn from New York.

Analysis of obesity prevention strategies suggests that regulatory policy interventions to improve defaults for the whole population are the swiftest and most cost-effective way of improving dietary health and reducing obesity.^v The World Health Organisation suggest the replacement of trans-fat with polyunsaturated fat would be highly cost-effective but also cheap, feasible and culturally acceptable to implement^{vi}. The Takeaways Toolkit specifically highlights NICE (2010) guidance that states that ‘industrially processed trans-fats should be eliminated from human consumption’^{vii}. New York has a tried and tested model that is working well – can Newcastle learn for this?

Consider the issue of cold-food takeaways (CFTs)

Much of the focus has been on HFTs yet CFTs such as small convenience shops, newsagents and local supermarkets are also an issue; they sell products to which children are exposed, and that are often high-energy dense and unhealthy^{viii}. It is important to note that taking action on hot food takeaways is only part of the solution, as it does not address sweets and other high-calorie food that children can buy in shops near schools.

The above recommendations above are restrictive by nature whereas the following are focused much more on supporting and stimulating sector:

Improved support for HFTs

As well as ensuring LAs have the capacity to support HFTs, it is also important to ensure there are skilled and dedicated LA staff available to offer tailored advice and support, especially to smaller independent HFTs. This is important as smaller independent outlets are prevalent in urban areas, have been largely by-passed by

mainstream central government initiatives designed to encourage healthier fast-food provision and because they often struggle to address some of the sustainability and catering issues that concern LAs^{ix}. LA staff (e.g. EHOs) must have the necessary knowledge, business and communication skills needed to work successfully with FFT businesses.

Encourage social entrepreneurship in the HFT and restaurant sector

Encourage entrepreneurs entering the restaurant and HFT sectors to go 'social'. Increasing the number of social entrepreneurs entering the sector will gradually change the culture of the sector. Social enterprises are, after all, set up for social or environmental good. Research conducted by Kitchenette (2013) found that the sector for eating out receives relatively little encouragement from policymakers, and that councils' regulatory restrictions can overwhelm entrepreneurs who do not see food as an important element of regeneration strategies^x. It is important to ensure any new policies related to the HFT sector encourage rather than stifle innovation.

Part 3 – A holistic approach

A conversation about how to promote the health and wellbeing of people in Newcastle is of pressing importance and to be welcomed. It is well documented that hot food takeaways often contribute negatively to health and wellbeing. However, for serious lasting improvements to the quality of lives in Newcastle, any Hot Food Takeaway SPD must form part of a broader, holistic approach to tackling environmental, economic and social issues connected to food. Listed below are a number of ways in which wider activity would compliment using planning tools to influence health outcomes.

Engaging with the Hot Food Takeaway Sector – we urge Newcastle City Council to explore opportunities to strengthen positive relationships with the existing takeaway sector in order to bring about further improvements and opportunities for interventions to be piloted. An example of a productive relationship between a local authority and the local HTF sector can be seen in Kirklees where biodegradable materials have been trialled at a subsidised cost. This has been made possible due to previous initiatives aimed at strengthening ties with the city's HFT businesses most of which are independently owned and operated. New York City recently became the first US city to ban the use of Styrofoam containers^{xi} across the city due to their poor environmental credentials. Oxford City Council has followed suit and become the first UK city to ban Styrofoam^{xii}, could Newcastle City Council become one of the next UK cities to take a lead on reducing the environmental impact of the out of home food sector?

A survey of British adults found almost two thirds believed that being overweight was an individual's own fault, and put this down to a lack of willpower^{xiii}. A subsequent study found vendors' views about individual responsibility for eating habits, body weight, and health in general were consistent with these findings^{xiv}. It was also found that businesses were reluctant to add healthier options (as an alternative to replacing existing menu items) because they felt that too much choice

would put customers off^{xv}. NEF research (2010) relating to the provenance of food found that fast-food owners knew little about where the food they sold came from, did not use food from certified systems such as Fairtrade and did not think their customers cared^{xvi}.

Engaging residents – during the recent Fuse Quarterly Research Meeting, ‘*More than enough on our plates, tackling the takeaway food diet at source*’^{xvii} a member of the Elswick Community First Panel highlighted the importance of working with residents to provide information and access to enable healthy food choices. Long term sustainable behaviour change requires individuals to demand and be able to access, affordable, locally produced, healthy and fresh food. Safeguarding current community food and nutrition initiatives and seeking opportunities to strengthen this sector must be a key part of a citywide health promotion strategy.

Working together – an important step towards taking a more integrated approach to food and health outcomes was taken when Public Health, Newcastle City Council committed to the development Food Newcastle, working alongside partners from the private and community and voluntary sectors to tackle key food issues and develop creative solutions. We look forward to engaging with Public Health, Newcastle City Council and the Food Newcastle partnership on the development of a public health food strategy for Newcastle. In an article reflecting on his six years as UN Special Rapporteur on the right to food, Olivier De Schutter made a pertinent observation;

“The more I have worked with governments operating from the top down, the more I have come to believe in the strength of social movements to make change happen from the bottom up. Solutions that can be designed using local resources (in addition to, not instead of, external resources that may provide backup) are less vulnerable to outside market or energy shocks. The more diverse these solutions, the better local systems will be equipped to deal with contingencies.”^{xviii}

Sharing learnings – Food Newcastle and its members will be interested to see the subsequent evaluation following the implementation of a SPD. Additionally, Food Newcastle would welcome an opportunity to discuss the development of Newcastle’s Development and Allocations plan (LDD) in the near future.

I would be happy to discuss any of the points raised within this response in more detail.

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- ⁱ Food Newcastle: www.foodnewcastle.org/newcastle-food-charter/
- ⁱⁱ Sustainable Food Cities: www.sustainablefoodcities.org
- ⁱⁱⁱ Boycott, R, and Jukes, G. (2012) *Takeaways Toolkit*. [Online]. Available at: http://www.london.gov.uk/sites/default/files/TakeawaysToolkit_0.pdf
- ^{iv} Bagwell, S, (2011) 'The role of independent fast-food outlets in obeseogenic environments: a case study of East London in the UK', *Environment and Planning*, 43(9), pp. 2217 – 2236.
- ^v Gortmaker, S.L et al. (2011) 'Changing the future of obesity: Science, policy and action'. *Lancet* 378, pp. 838 – 847.
- ^{vi} WHO (2011) *Public Health and Environment Global Strategy Overview*. [Online]. Available at: http://www.who.int/phe/publications/PHE_2011_global_strategy_overview_2011.pdf?ua=1
- ^{vii} National Institute for Health and Clinical Excellence (2010) *Prevention of Cardiovascular Disease*. [Online]. Available at: <https://www.nice.org.uk/guidance/ph25>
- ^{viii} Horsley (2013) 'The proportion of unhealthy foodstuffs children are exposed to at the checkout of convenience supermarkets.' *Public Health Nutrition*, 17(11), pp. 2453–2458.
- ^{ix} Cities Institute (2013) *Fast food takeaways: A review of the evidence base*. [Online] Available at: <http://www.citiesinstitute.org/fms/MRSite/Research/cities/Publications%202013/Fast%20Food%20Evidence%20Final.pdf>
- ^x Kitchenette (2013) *A Steak in the Economy*. [Online] Available at: <http://www.nesta.org.uk/publications/steak-economy>
- ^{xi} <http://www.bbc.co.uk/news/magazine-33334994>
- ^{xii} <http://www.independent.co.uk/news/uk/home-news/oxford-becomes-first-uk-city-to-ban-nonrecyclable-plastic-food-containers-10174601.html>
- ^{xiii} Beeken, R.J, Wardle, J. (2013) 'Public beliefs about the causes of obesity and attitudes towards policy initiatives in Great Britain'. *Public Health Nutrition*, 16, 2132–2137
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- ^{xv} Estrade, M, Dick, S, Crawford, F, Jepson, R, Ellaway, A & McNeill, G. (2014) 'A qualitative study of independent fast food vendors near secondary schools in disadvantaged Scottish neighbourhoods' *BMC Public Health*, 14, 793.
- ^{xvi} New Economics Foundation (2010) *An Inconvenient Sandwich: The Throwaway Economics of Takeaway Food*. [Online]. Available at: <http://www.neweconomics.org/publications/entry/an-inconvenient-sandwich> (Accessed: 24 November 2014).
- ^{xvii} <http://www.fuse.ac.uk/events/fusequarterlyresearchmeetings/morethanenoughonourplatestacklingthetakeawayfooddietatsource.html>
- ^{xviii} <http://foreignpolicy.com/2015/07/20/starving-for-answers-food-water-united-nations/>