

## Health & Wellbeing

### Healthy Food Businesses – Our Considerations

#### 1. Issues and Opportunities

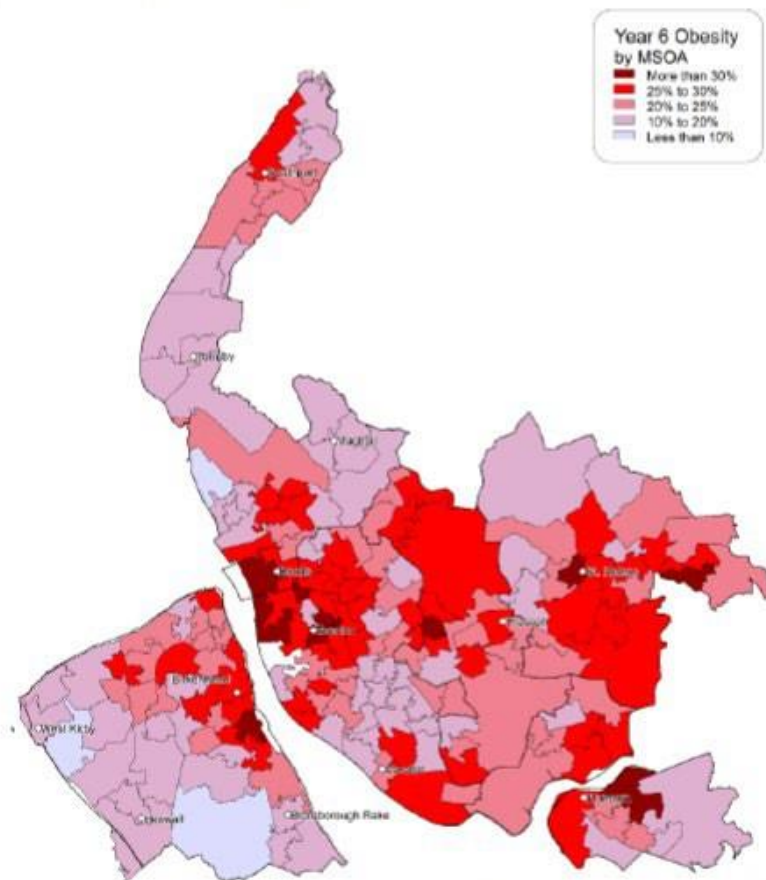
- 1.1. Public Health England has [set out](#), that whilst not all fast food is unhealthy, it is typically high in saturated fat, salt and calories, with excess calorie consumption a root cause of the obesity crisis. In addition, [National Planning Policy Guidance](#) (PPG) notes that planning can influence the built environment to improve health and reduce obesity and excess weight in local communities. In light of this and the wider context set out below, we are considering what role the SDS could have in supporting healthy food businesses across the City Region.
- 1.2. The Government's 2019 English Indices of Deprivation show that almost a third of the City Region's neighbourhoods are within the top 10% most deprived in England. As such the City Region is significantly more deprived than the national average. Furthermore, almost half of the City Region's neighbourhoods are within the top 10% most health deprived within England, with areas of high health deprivation tending to be those also affected by high levels of multiple deprivation. The City Region also faces an obesity problem whereby almost every district has an obesity rate above the national average for children in year 6 as shown in Figure 1<sup>1</sup>.
- 1.3. Compounding this, two thirds of schools and colleges in the City Region are within 400 metres of a takeaway<sup>2</sup>, which is considered to be the distance most young adults are willing to walk. Furthermore there are areas in the City Region that have a large number of takeaways and no supermarkets, with a number of 'food deserts' identified by a [Kellogg's Report \(2018\)](#). 'Food deserts' are defined as areas which are poorly served by food stores, especially stores that sell fresh, healthy products at affordable prices. Living in a food desert can sometimes be more challenging for those on low incomes, or vulnerable individuals which may limit their ability to travel to stores that are further afield. The Kellogg's Report found that some areas in Sefton, Liverpool, Halton and Knowsley are among the top ten most deprived food deserts in England.

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<sup>1</sup> LCRA Evidence Research & Intelligence.

<sup>2</sup> LCRA Evidence Research & Intelligence.

## Prevalence of Obesity Among Year 6 Children (Aged 10-11) by Middle Super Output Area (MSOA), 2015/16 – 2017/18



Figures presented with 95% confidence intervals

Figure 1. Prevalence of Obesity Among Year 6 Children.

## 2. Why does the Spatial Development Strategy need to address this?

21. The importance of health in achieving sustainable development and the promotion of healthy lifestyles and healthy living are recognised in the [National Planning Policy Framework](#) (NPPF). Of relevance, the NPPF sets out that planning policies should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles; especially where this would address identified local health and well-being needs. Examples of this include the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
22. As set out above, the PPG notes that planning can influence the built environment to improve health and reduce obesity and excess weight in local communities. Where

justified, it goes onto say planning policies can seek to limit the proliferation of particular uses where evidence demonstrates that this is appropriate and where such uses require planning permission. Issues that such a policy would need to have regard to cited in the PPG includes proximity to locations where children and young people congregate, evidence indicating high levels of obesity, deprivation, health inequalities and general poor health in specific locations, and over-concentration of certain uses within a specified area.

23. Guidance produced by [Public Health England](#) demonstrates that the planning system can be used to support individuals and local communities in maintaining and achieving a healthy weight. They identified that one way to maintain a healthy weight can be achieved by encouraging access to healthier food and drink options through the local food environment.
24. As hot food takeaways do not fall into use classes E (Commercial, Business and Service) and F (Including learning and non-residential institutions and local community) in [recent changes](#) to the planning use class order, planning permission would not be required to change between these land uses. As such the SDS could potentially influence the development of hot food takeaways in the City Region.
25. The Government as part of its recently published [Obesity Strategy](#) have highlighted the link between obesity and the risk of becoming ill and dying from COVID-19. Whilst it cannot be assumed all takeaway food is unhealthy, the Obesity Strategy cites evidence that on average the portions of food or drink that people eat out or eat as takeaway meals contain twice as many calories as their equivalent bought in a shop. In response, the Government propose that customers are given the right information to make healthier choices, as well as changes to food deals and the way food is marketed to children.

### **3. What is being done by the Combined Authority?**

- 3.1. The SDS has a statutory duty to address health and health inequalities.
- 3.2. Health forms part of the Metro Mayor's Manifesto, wherein he identifies that he will tackle City Region health issues by:

- Integrating public health to encourage healthy and active lifestyles by promoting sport, walking and cycling, and delivering a strategy to make these sustainable and more healthy forms of transport safer and more attractive to all;
  - Delivering joined-up initiatives with local authorities and NHS Trusts that encourage healthy and active lifestyles across the City Region as part of an integrated public health strategy.
33. The Combined Authority already has a number of initiatives and strategies that will help address obesity through supporting active travel including the [Liverpool City Region Combined Authority Cycling and Walking Infrastructure Plan](#) and the [Liverpool City Region Combined Authority Local Journeys Strategy](#). Of relevance to skills, a [Health and Care Growth Action Plan](#) has also been produced by the Combined Authority

#### **4. What you told us**

41. Of relevance to this topic area, responses to our previous SDS public engagement highlighted that many felt that the location of hot food takeaways and other unhealthy uses were too close to schools and often caused anti-social behaviour, and even obesity in some cases.

#### **5. How we could respond**

- 5.1. To complement other SDS policies suggested as part of this engagement and the Government's proposals in the Obesity Strategy, we are considering including a policy in the SDS to manage the location of hot food takeaways.
- 5.2. The proliferation of unhealthy outlets such as hot food takeaways have typically been restricted on the basis of prioritising retail shops (previously defined as use class A1) and on grounds of impacts on neighbouring living conditions and litter. However, managing hot food takeaways against health-based planning criteria is being used more in adopted development plans. Our suggested approach to tackling obesity levels across young people would be:

To restrict new hot food takeaways in locations where obesity levels are high or near where children and young people congregate, such as schools, community centres and playgrounds.

- 5.3. The suggested policy approach would seek to promote healthy places by restricting the proliferation of unhealthy outlets and would include greater detail on how its criteria would apply. An example of one approach could be restricting hot food takeaways where schools, and other places young people congregate are located within 400m<sup>3</sup>.
- 5.4. We are also considering how we could measure and define when an area becomes over concentrated with hot food takeaways, and how the suggested policy could manage new hot food takeaways in such circumstances. We also note that the Government's White Paper [Planning for the Future](#) envisages a move towards a map and rule based approach as opposed to vague statements of policy, and proposes growth, renewal and protection areas. In this context we will be considering how this policy could also define and positively support the delivery of healthy food businesses, particularly in deprived areas.
- 5.5. In suggesting the above policy approach, we recognise that hot food takeaways encompass a variety of food types. However, controlling what specific types of hot food are served to customers at takeaways lies beyond the control of the planning system. In addition, whilst planning rules have been relaxed so that [pubs and restaurants can operate as hot food takeaways](#) in response to COVID-19, this will only apply for a 12 month period. We also consider that the suggested approach set out above could still have a positive impact on addressing obesity, despite the availability of delivery services provided in the sector. As the suggested policy approach would only apply in certain circumstances, our initial view is that it is not likely to unduly restrict businesses. We will however be further developing our evidence base around the suggested policy approach.
- 5.6. The suggested policy approach, alongside other suggested policy approaches in the SDS and other obesity and health strategies outside of the planning system, would help address health and health inequalities across the City Region.

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<sup>3</sup> Public Health England (2020), Using the planning system to promote healthy weights environments.

## 6. Which Objectives will this approach help to achieve?

6.1. The suggested policy approach will help support the following SDS objectives:



Addressing health inequalities and creating a healthier City Region



Creating high quality buildings and places that allow our communities to flourish



Delivering an Inclusive Economy



Embedding Social Value in all aspects of development

## 7. How can we make sure this approach would work?

7.1. Data sets around the following areas could be used to monitor the effectiveness of the suggested policy:

- The performance of planning applications against the suggested policy approach;
- Obesity levels of year 6;
- Number of fast food outlets (Food Standard Agency);
- IMD data sets