

Dear Sir/Madam

I have the following comments on Ch 6 Policy E9

Para C: I welcome the advice that all boroughs should restrict the opening of new takeaways within 400m of schools. However research suggests that school children also consume a lot of fast food and other unhealthy drinks and snacks on the journey too and from school. Local authorities should therefore be advised to consider the whole journey which may well extend beyond the 400m radius. Some local authorities are also extending their exclusion area to include leisure centres and other places that children and young people frequent. Furthermore if such policies are to be successfully upheld when challenged local authorities need to have a sound evidence base (on the unhealthy nature of the food sold by local outlets and local rates of obesity) and a co-ordinated set of policies that are advocating similar action. Advice on this is set out in the recent PHE Toolkit [Strategies for encouraging healthier 'out of home' food provision: toolkit](#) published last year.

This toolkit also identifies a number of other strategies that local authorities can adopt to increase the healthiness of the food sold in the out of home food environment including:

Using local authority leasing and licensing and purchasing powers to for example demand that suppliers of the food sold through vending machines on local authority owned premises meets healthier standards.

Or that market stall holders selling healthier food get a discount on their pitch fee.

Case studies of local authorities that have successfully adopted such practices are set out in the PHE toolkit so I am surprised that there is no reference to it in the London Plan as it is one of the most recent pieces of research and guidance available.

Para 6.9.6 and 6.9.7.

Whilst a policy of restricting the opening of new fast food outlets is welcome, the Plan needs to recognise that in many areas there is already a heavy concentration of outlets which cannot be closed down unless they fail to comply with food health and hygiene regulation. Action therefore needs to focus on working with existing outlets to encourage them to sell healthier food such as the Healthier Catering Commitment. This action needs to result in the provision of healthier food that is affordable for low income communities where fast food outlets are often most concentrated and where rates of obesity levels tend to be highest. At present many interventions that focus on encouraging healthier food tend to benefit more affluent communities able to afford the extra costs involved and thus unwittingly actually increase health inequalities. Resources need to be invested to enable local authorities to work with fast food outlets and other independent outlets selling food in the local area to enable them to find ways of making the food they sell healthier without requiring an increase in prices. Some strategies that work are outlined in papers produced by Bagwell (2015) Designing healthier catering interventions for takeaways in deprived areas, Journal of Environmental Health Research, 2015 and the PHE (2017) toolkit highlighted above.

Regards

Sue Bagwell