



Response to the draft London Plan consultation from the British Takeaway Campaign

The British Takeaway Campaign (BTC) is an umbrella group, championing all those involved in the supply and preparation of takeaway food. The group comprises 13 member organisations, representing the breadth of the industry, from curry and kebab houses to fish and chip shops, Chinese restaurants and pizzerias.

These members are Just Eat, the British Kebab Awards, the National Federation of Fish Friers, SeeWoo, the Association of Licensed Multiple Retailers, the Foodservice Packaging Association, K10 Restaurants, Curry Life Magazine, QuickBite Magazine, the Night Time Industries Association, the UK Bangladesh Catalysts of Commerce and Industry, and the Bangladesh Caterers Association. The BTC also works in collaboration with the Pizza, Pasta and Italian Food Association.

The BTC exists to champion an industry which makes a significant economic, social and cultural contribution to the UK. The takeaway industry is a fast growing sector, utilising the latest technology and creating jobs whilst contributing significantly to the UK economy.

Independent research carried out for the BTC by economic consultancy the Centre for Economics and Business Research showed takeaway restaurants directly contributed £4.5 billion in gross value added (GVA) to the UK's GDP in 2016. That rises to £9.4 billion when factoring in the multiplier effect of supply-chain and employee spending – equivalent to 0.5% of GDP and more than telecoms, advertising or Premier League football.

In London, the takeaway sector is hugely popular and packs a significant economic punch. Our research shows that Londoners spent £1.4 billion on takeaways in 2016, the highest of any region in the UK. The industry supports more than 23,000 jobs in the capital.

The sector is rightly proud of its economic impact, but its contribution to a healthier and more diverse food environment is equally important. There are now more than 100 cuisines available, with many takeaways offering healthier menu items and providing more nutritional information to their customers. Indeed, 65% of takeaways now offer low fat options, with 59% offering low salt alternatives. Vegetarian options are available in 96% of takeaways, and small portion sizes in 73%.

The sector also plays a key role in contributing to local communities. More than two fifths of takeaways are actively involved in community-based activities, with 62% of these sponsoring local activities or sports teams, and 61% providing food to charities, care homes or local events.

Unless otherwise stated, all statistics used in this response are drawn from research commissioned by Just Eat for the BTC and compiled by the Centre for Economics and Business Research, or a survey carried out by Just Eat of 300 restaurants on its platform.

The BTC welcomes the opportunity to respond to the draft London Plan, and to working with the Greater London Authority as it develops its final proposals. The BTC has commented on the relevant chapters and policies below.



Should you have any questions about this response, or wish to discuss its contents further, please contact Katie Gleeson at katiegleeson@newingtoncomms.co.uk or on 020 3176 2839.

Chapter 1 Planning London's Future (Good Growth Policies)

Policy GG3: Creating a healthy city

It is important to remember that takeaways do not just pack a huge economic punch – they also play a key role in regenerating high streets, and are mainly small businesses and local employers.

The draft London Plan is right to focus on enabling Londoners to make healthy food choices. The principle of educated consumer choice is central to the BTC's approach to encouraging healthy lifestyles, and takeaways are taking considerable steps to support Londoners in making better food choices. These include offering healthier menu options, reformulating products and adapting cooking methods, and providing more information to their customers.

The sector has a strong track record in providing healthier menu options. Indeed, 96% of takeaway restaurants offer vegetarian options, and 73% offer small portion sizes. Low fat options are available in 65% of restaurants, while low salt alternatives are available in 59%. Takeaway restaurants therefore play a valuable role in offering the choice and variety that customers want – with grilled chicken kebabs and salad, as well as the growth in Portuguese chicken and stir fry dishes, evidence of this.

Embracing different cooking techniques is also an important part of this. There are now examples of restaurants offering low-fat versions of favourite options, such as fish, chips and burgers – for example by air-frying them. The use of different methods is being actively encouraged across the sector. For example, a 2016 report, *Does Size Matter*, by Enjoy Fish and Chips – supported by BTC member the National Federation of Fish Friers – advises fish friers how to achieve the lowest values for energy, fat, saturates, trans-fatty acids and salt. Friers are advised to use cod or haddock, with thin, light batter, and rapeseed oil and to ensure it is cooked at the optimal temperature. A medium sized piece of cod prepared in this way contains 234 calories and 1.2g saturated fat per 100g. As further examples, Calowries in Putney air fry their chips and chicken nuggets to provide a range of low calorie dishes, while Eat Fit Food in Holloway offers oil free dishes which are low in fat.

Furthermore, takeaway restaurants are increasingly providing more information to their customers. Kichn in Islington, for example, provides the calorie, saturated fat, protein and carbohydrate information for their dishes, while the National Federation of Fish Friers encourages the use of standardized portion size names so customers know what to expect.

The BTC agrees that those involved in planning and development should encourage a healthy food environment in order to promote health living. However, we believe an approach centred on restricting consumer choice would attempt to tackle the problem in the wrong way. With takeaway restaurants increasingly offering healthy options on their menus, efforts should be primarily focused on how to facilitate informed decision making by Londoners. That is why the BTC is calling for the Government to provide online calorie calculators in order to help smaller businesses empower customers to make informed choices.



We understand that the Healthier Catering Commitment can help smaller restaurant businesses understand the steps they can take to increase the healthiness of the meals they serve. Just Eat, a BTC member, which partners with over 5,400 largely independent restaurants in London, has committed to communicating the Healthier Catering Commitment to its restaurant community this year to support local authorities in engaging takeaways on this important matter. While many takeaway restaurants already comply with the Healthier Catering Commitment, we acknowledge we can play a role in helping to reach restaurants that need additional support.

Just Eat has also joined forces with Shift, a charity which uses research and design techniques to create products and services which help address social problems. Alongside six other organisations (Esmee Fairbairn Foundation, Guys and St Thomas' Charity, Mark Leonard Trust, Tower Hamlets Council, Hackney Council and Birmingham City Council), Just Eat and Shift have created the Better Fast Food Network to understand the challenges faced by independent fast food outlets and support them to gradually and sustainably improve the healthiness of the meals they serve.

Shift will be undertaking work with and on behalf of these organisations over a period of two years to develop financially sustainable ways to improve the healthiness of the UK's fast food before setting up a stand-alone organisation that will oversee this work into the future.

Policy GG5: Growing a good economy

The BTC welcomes the commitment within the draft London Plan to promote and support London's role as a 24-hour city, of which takeaway restaurants and street markets play an important role. It is important to remember that takeaways do not just pack a huge economic punch – contributing £1.4 billion to the London economy in 2016, and supporting more than 23,000 jobs in the capital – they also play a key role in regenerating high streets and enriching local communities.

Chapter 5 Social Infrastructure

Policy S5: Sports and recreation facilities

The BTC welcomes the draft London Plan's commitment to ensuring the sufficient supply of good quality sports and recreation facilities in order to encourage physical activity and to deliver a range of social, health and wellbeing benefits to London's diverse communities.

The takeaway sector is proud of its economic impact – contributing almost £1.4 billion to the London economy in 2016, and supporting more than 23,000 London jobs – but its social and cultural contributions, including to London community, are equally important. More than two fifths of takeaways are actively involved in community-based activities, with 62% of these sponsoring local activities or sports teams, and 61% providing food to charities, care homes or local events. Amigos Mexican Takeaway in Holloway, for example, take part in charity bike rides such as the London to Brighton Bike Ride and the Virgin London Triathlon, while Tarka Indian Cuisine in Dagenham sponsors a local football club.



Chapter 6 Economy

Policy E9: Retail, markets and hot food takeaways

The draft London Plan is right to focus on creating a successful and diverse retail sector which promotes access to goods for all Londoners. However, we are concerned by the assumption that takeaway restaurants sell unhealthy food, as well as proposals to limit A5 hot food takeaway uses near schools.

The role of hot food takeaways in creating a successful and diverse retail sector

The BTC welcomes the Greater London Authority's determination to tackle obesity, and understands that the takeaway sector has an important role to play in promoting healthier diets. Increasingly, households are valuing the role that takeaway restaurants can play in contributing towards a balanced lifestyle – which can provide a healthy alternative to a home-cooked meal. This is shown by the sharp growth of new takeaway options since 2014, alongside the enduring popularity of the UK's favourites.

Indeed, there are now more than 100 cuisines available in the UK, with many takeaways offering healthier menu items and providing more nutritional information to their customers. Through responding to consumer preferences, across the UK, 65% of takeaways now offer low fat options, with 59% offering low salt options. Vegetarian options are available in 96% of takeaways, and small portion sizes in 73%.

While the whole of the food industry has an important role to play in tackling obesity, it is a highly complex issue, with sedentary lifestyles, lack of exercise, health issues and nutritional education also major factors. Ultimately, informed consumer choice is the best way to tackle the problem.

In this context, the BTC is concerned that the draft London Plan assumes hot food takeaway restaurants sell food that is high in calories, fat, salt and sugar, and low in fibre, fruit and vegetables. It is important for there to be an understanding of the sector's record in providing healthier options. Indeed, 96% of takeaway restaurants offer vegetarian options, and 73% offer small portion sizes. Low fat options are available in 65% of restaurants, while low salt options are available in 59%. As an example, Eat Fit Food in Holloway offers oil free dishes which are low in fat, while many Indian restaurants provide curries without sauces as a low fat alternative.

Embracing different cooking techniques is an important part of this. There are now examples of restaurants offering low-fat versions of favourite options, such as fish, chips and burgers – for example by air-frying them. The use of different methods is being actively encouraged across the sector. For example, a 2016 report, *Does Size Matter*, by Enjoy Fish and Chips – supported by BTC member the National Federation of Fish Friers – advises fish friers how to achieve the lowest values for energy, fat, saturates, trans-fatty acids and salt. Friers are advised to use cod or haddock, with thin, light batter, and rapeseed oil. A medium sized piece of cod prepared in this way contains 234 kcals, and 1.2g saturated fat per 100g.

Takeaway restaurants are also increasingly providing more information to their customers. The National Federation of Fish Friers, for example, also encourages the use of standardized portion size names, so that customers know what to expect, and the provision of clear, simple and honest nutritional



information. As a further example, Salad Box in Aldgate provides the fat, protein and carbohydrate information for their dishes.

The BTC believes an approach to deliberately hold back the takeaway sector would not help to address the underlying causes of obesity. With takeaways increasingly offering healthy options on their menus, efforts should be primarily focused on how to facilitate informed decision making by Londoners.

For example, trials involving takeaways on the Just Eat platform have found that publishing information about calories and hygiene ratings can translate into more orders, suggesting that customers value this further information. Just Eat has itself been supporting its 28,000 restaurant partners (5,400 of which are in London) with nutritional advice, to adapt their menus to reduce fat and salt. This includes encouraging takeaways to reduce portion sizes, reformulate current recipes, and highlight and upsell healthy dishes on their menu. In addition, restaurants are being encouraged to switch from saturated fats to lower saturated oils, such as coconut oil.

We acknowledge there is more we can do to help independent restaurant owners better understand customer expectations around food diversity and information and Just Eat is committed to using its partner marketing channels to communicate positive messages to its restaurant partners, explaining how introducing more healthy options can also bring commercial benefits, which is a crucial consideration for small businesses. Just Eat has committed to communicating the Healthier Catering Commitment to its restaurant community this year to support local authorities in engaging takeaways in this important matter.

Just Eat has also joined forces with Shift, a charity which uses research and design techniques to create products and services which help address social problems. Alongside six other organisations (Esmée Fairbairn Foundation, Guys and St Thomas' Charity, Mark Leonard Trust, Tower Hamlets Council, Hackney Council and Birmingham City Council), Just Eat and Shift have created the Better Fast Food Network to understand the challenges faced by independent fast food outlets and support them to gradually and sustainably improve the healthiness of the meals they serve.

Shift will be undertaking work with and on behalf of these organisations over a period of two years to develop financially sustainable ways to improve the healthiness of the UK's fast food before setting up a stand-alone organisation that will oversee this work into the future.

The public sector also has a role to play in making information more accessible. While the NHS Choices website already has suggestions for making takeaways healthier – such as choosing grilled meats, and adding vegetable toppings to pizzas – we are calling for the Government to go further, by providing simple online calorie counters to help small independent takeaways provide their customers with more information.

A standard calorie counter would remove many of the problems surrounding the requirement for takeaways to label their food independently. These issues include the significant cost pressures for small, independent takeaways, which are less able to carry out such complex scientific analysis than larger businesses, while also raising questions around standardisation and accuracy.



Development proposals containing A5 hot food takeaway uses near existing schools

The BTC is concerned by the draft London Plan's recommendation that development proposals containing A5 hot food takeaway uses should not be permitted within 400 metres walking distance of an existing or proposed primary or secondary school.

The BTC is concerned that there is no obvious rationale for the 400 metres figure and believes artificially restricting competition and forcing takeaways to clump together in areas outside the exclusion areas would cause long term distortion to local high streets. Furthermore, such an approach to deliberately hold back the takeaway sector would not help to address the underlying causes of obesity. With the sector increasingly offering healthy options on their menus, efforts should be primarily focused on how to facilitate informed decision making by consumers.

The principle of working with schools to educate children about healthy lifestyles is central to the BTC's approach to tackling obesity, and we are pleased that takeaway restaurants are getting directly involved in children's education, where appropriate. As an example, Chris's Fish and Chips in Barwell (a previous winner of best takeaway in Britain at the British Takeaway Awards and the inaugural winner of the Sustainable Restaurant Association's "Good to Go" award in 2017) go into local schools to educate children about the food chain – from healthier options to sustainable sourcing. Just Eat is also partnering with skills and training charity, Springboard, to help restaurants fill skills gaps and inspire young people about the career opportunities available within the independent restaurant – from kitchen to front of house, supporting the Government's vocational education agenda. Initiatives such as this demonstrate the positive, responsible contribution that takeaways can make to their local communities – including through helping children to have a healthy relationship with food.

As part of these efforts, we would re-emphasise the importance of making as much nutritional information as possible available to consumers (as many takeaways are doing already) and ensuring that consumers of all ages are well educated – throughout their lives – as to the importance of a balanced diet and active lifestyle, further detail of which was set out in the section above. That is why the BTC is calling for the Government to provide online calorie calculators in order to help smaller businesses who may not otherwise have the expertise or resources to empower customers to make informed choices.

Street markets as a valuable economic, social and cultural contributor to London life

The draft London Plan is right to recognise that street markets play a valuable economic, social and cultural role across the capital in helping to meet Londoners' varied dietary requirements, extending consumer choice, contributing to the vitality and viability of town centres, and providing opportunities for new businesses to start-up.

Indeed, street markets are increasingly involved in initiatives that provide health and social benefits to London's diverse communities. For example, the Nationwide Caterers Association (NCASS), a BTC member, has pledged to support the Food Foundation's Peas Please project by working with traders to reduce meat offerings and replace them with at least two portions of fruit or vegetables. Meanwhile, the Eighth Plate project is tackling food waste and hunger, working in conjunction with FareShare to



salvage food waste from traders and donate it to food banks, soup kitchens and charities, benefitting both the community and the environment.

Street markets also play a key role in rejuvenating town centres. As an example, NCASS works with small and medium-sized enterprises, council departments and other local stakeholders as part of the Streetfood Alliance to support the development of diverse and innovative new businesses, revitalising highstreets and encouraging tourism and inward investment. With a Streetfood Alliance already up and running in Birmingham, NCASS is working to set up an Alliance in London with KERB food to help develop the street food scene in London's markets further.

Whilst the cost of opening a restaurant can be expensive, street markets provide an alternative way for people to start-up a business, create jobs and contribute to the diversity of the capital's highstreets. This can be illustrated with the examples of Boxpark or Dinerama in Shoreditch, Pop Brixton and similar concepts that have followed – regenerating shipping container sites which provide a wide-ranging choice for consumers and have become profitable community hubs of diversity.

Supporting the Healthier Catering Commitment

The BTC welcomes proposals to encourage takeaway restaurants to comply with the Healthier Catering Commitment standard. We would bring the Greater London Authority's attention to the fact that many restaurants already meet many of the Healthier Catering Commitment criteria, including by using healthier cooking methods like grilling and steaming, serving thick-cut chips and serving healthy accompaniments to meals. For example, Olley's Fish Experience in Herne Hill offers numerous healthy sides, including spinach, salad, broccoli and grilled vegetables alongside grilled or steamed fish. 73% of surveyed takeaways also offer small portion sizes.

Whilst the BTC is not able to commit to every takeaway restaurant being able to adhere to the Healthier Catering Commitment, we would urge the Greater London Authority to support takeaways in helping their customers to make healthier choices, by supporting our calls for the Government to provide an online calorie calculator and downloadable calorie sheets or posters.

Policy E11: Skills and opportunities for all

The BTC welcomes the focus within the draft London Plan to develop Londoners' skills, as this will be crucial to supporting the future success of the sector. The takeaway industry supports more than 23,000 jobs in London, and offers a valuable career path for budding entrepreneurs – many of whom go on to run successful businesses and chains. For example, BTC Chair Ibrahim Dogus climbed the ranks of the takeaway industry before setting up multiple Turkish restaurants across London.

Whilst employment within the sector is set to rise over the next five years, demand for employees is expected to exceed supply. Our research shows that already, 23% of takeaway restaurants are unable to recruit the staff they need to run their business. These shortages are felt most acutely in skilled kitchen roles, where 78% of those reporting problems have had issues recruiting chefs, particularly in curry and sushi making roles, while 37% believe Brexit will make recruitment harder.



The draft London Plan should therefore go beyond Higher Education to include Further Education providers which are well placed to upskill Londoners at an earlier and more accessible stage. The introduction of the Government's new technical education qualifications (T levels) is a welcome development. We are proud to be working with the Department for Education to shape the Catering and Hospitality T level for 16 to 18 year olds so that the syllabus meets the needs of the industry, by ensuring that compulsory components in shortage cuisines like fish frying and curry preparation and seasoning, as well as on hygiene, nutrition and sustainability, are included.

Just Eat is also partnering with skills and training charity, Springboard, on a new initiative – the Just Eat Skills Kitchen – which aims to help restaurants fill skills gaps and inspire young people about the career opportunities available within the independent restaurant – from kitchen to front of house, supporting the Government's vocational education agenda.

Ultimately, the BTC believes that the Skills for Londoners Taskforce presents an opportunity to incorporate the hospitality industry, and we would welcome further discussions with the Greater London Authority on how we could collaborate to provide high quality skills development in the takeaway sector.

Chapter 7 Heritage and Culture

Policy HC5: Supporting London's culture and creative industries

The draft London Plan is right to recognise that the capital has a rich cultural offer, including a diverse food scene, and we welcome proposal for boroughs to support the growth and diversification of the night-time economy.

Indeed, takeaway restaurants introduce people to new cultures – a role that is particularly evident in the increasing popularity of cuisines that have not been traditional staples of the British takeaway. For example, takeaway orders from Middle Eastern and North African restaurants have increased three fold over the last three years, including a 907% increase in demand for Syrian food. This helps to bring communities together – an effect that takeaways also have through bringing people to highstreets and regenerating town centres.