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Planning Application Reference 2018/3951/P: Change of use from restaurant (Planning use class A3) to hot food takeaway (Planning use class A5) at 35 Pratt Street London NW1 0BG

Rapid Health Impact Assessment

Camden and Islington Public Health

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Planning Application Reference 2018/3951/P: Change of use from restaurant (Planning use class A3) to hot food takeaway (Planning use class A5) at 35 Pratt Street London NW1 0BG

The Camden and Islington Public Health Department, on behalf of LB Camden, objects to the planning application 2017/2273/P on the grounds that an additional hot food takeaway in close proximity to three schools in Camden:

- St Michael's Church of England Primary School, Camden St, London NW1 0JA, with a capacity for 210 pupils, located 146 metres from 35 Pratt Street, has 13 existing fast food retailers¹ within a 400m radius (around 10 minutes' walking time).
- Our Lady's Catholic Primary School, Pratt St, Camden Town, London NW1 0DN, with a capacity for 223 pupils, located 230 metres from 35 Pratt Street, has four existing fast food retailers¹ within a 400m radius.
- Richard Cobden Primary School Camden St, Camden Town, London NW1 0LL, with a capacity for 420 pupils, located 338m from 35 Pratt Street, has nine existing fast food retailers¹ within a 400m radius.

There is a concentration of businesses providing fast food in the immediate area, with four existing businesses within 200 metres, 11 within 300m, and 20 within 400m of 35 Pratt Street.¹ The area has a high level of childhood overweight, with 43.2% of children in year 6 being overweight or very overweight.²

The relevant Local Plan policies is Policy TC4 – Town Centre Uses:

- b) the cumulative impact of food, drink and entertainment uses, taking into account the number and distribution of existing uses and non-implemented planning permissions and any record of harm caused by such uses
- f) the health impacts of development.

Camden's adopted Local Plan states that "child obesity is a problem in the borough and children who are overweight are more likely to remain obese into adulthood and develop long term health problems such as diabetes and cardiovascular disease. Creating places that make it easier to take part in physical activity, access to healthier food choices, and safe and accessible spaces for play, sport and recreation will help to tackle this issue."

Change of use from restaurant to fast food takeaway is not conducive to LB Camden's holistic approaches to tackling childhood obesity, which is prevalent in the borough and particularly in the area around the premises.

The National Child Measurement Programme (NCMP) measures the weight and height of children in reception class (aged 4 to 5 years) and year 6 (aged 10 to 11 years) to assess the prevalence overweight and very overweight children within primary schools. The NCMP is widely recognised as a world-class source of public health intelligence and has UK National Statistics status. The programme has been running since 2006/07. It is important to note that as the programme measures weight in reception and year 6 children, each year represents a different population. However, as the programme has now been running for 11

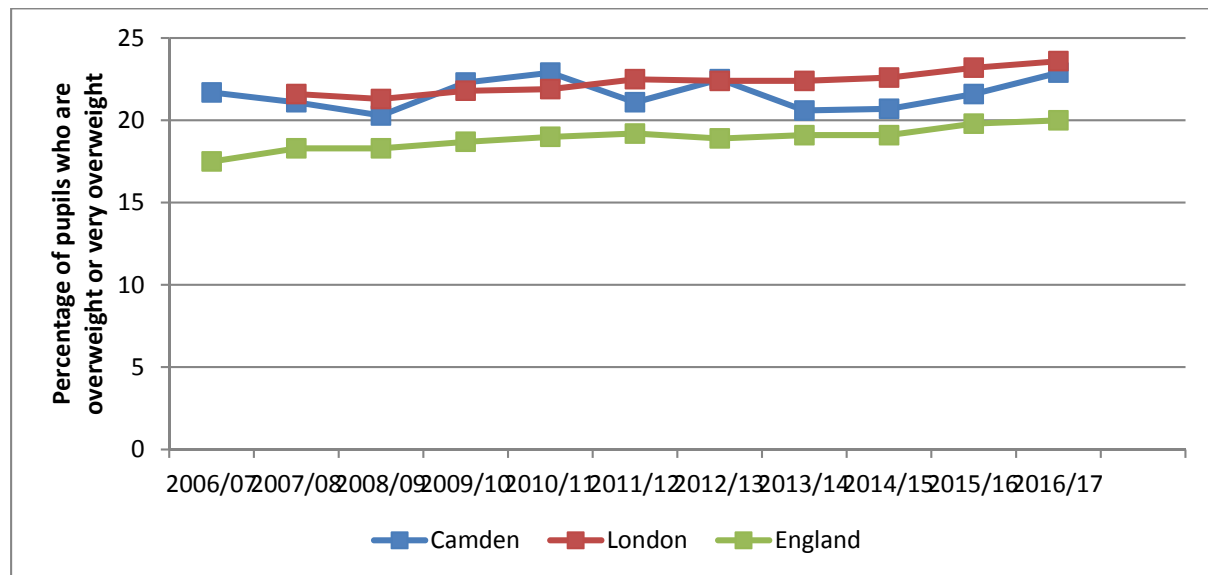
¹ Data from Camden's Food Hygiene Rating Scheme, updated October 21st 2018. Note that these data relate to premises selling fast food, and not necessarily premises with a planning class use of A5. Available from <https://opendata.camden.gov.uk/Health/Food-Hygiene-Rating-Scheme-Camden/ggah-dkrr>

² Data from the National Child Measurement Programme. Available at <https://fingertips.phe.org.uk/profile/national-child-measurement-programme>

years, it is clear that the proportion of children in Camden who are overweight or very overweight doubles during the primary school years (from an average of 10.7% of reception year pupils in 2006/07 to 2010/11 to an average of 21.7% of year 6 pupils in 2012/13 to 2016/17).³

NCMP data show that the prevalence of overweight and very overweight pupils in year 6 in Camden has been increasing in recent years, with 22.9% of children overweight or very overweight in 2016/17, a significantly higher proportion compared to England (Figure 1).

Figure 1: Proportion of Year 6 pupils who are overweight or very overweight, Camden, London and England, 2006/07 to 2016/17



Source: NCMP

Public Health England publishes NCMP data based on residence at Middle Super Output Area (MSOA).⁴ The MSOA in which 35 Pratt Street is located ranks 295th highest out of 6,751 English MSOAs with a valid Year 6 NCMP calculation,⁵ placing it within the 5% of MSOAs with the highest prevalence of Year 6 overweight or very overweight. Within Camden, this MSOA ranks 3rd highest for overweight and very overweight in Year 6, out of 26 Camden MSOAs with a valid Year 6 NCMP calculation.³

Figure 2 shows a map of Camden’s MSOAs, the location of 35 Pratt Street, the locations of St Michael’s, Our Lady’s and Richard Cobden schools, and the locations of premises selling takeaway food across Camden. The map shows that if granted planning permission for hot food takeaway use, 35 Pratt Street would be the closest takeaway to St Michael’s and Our

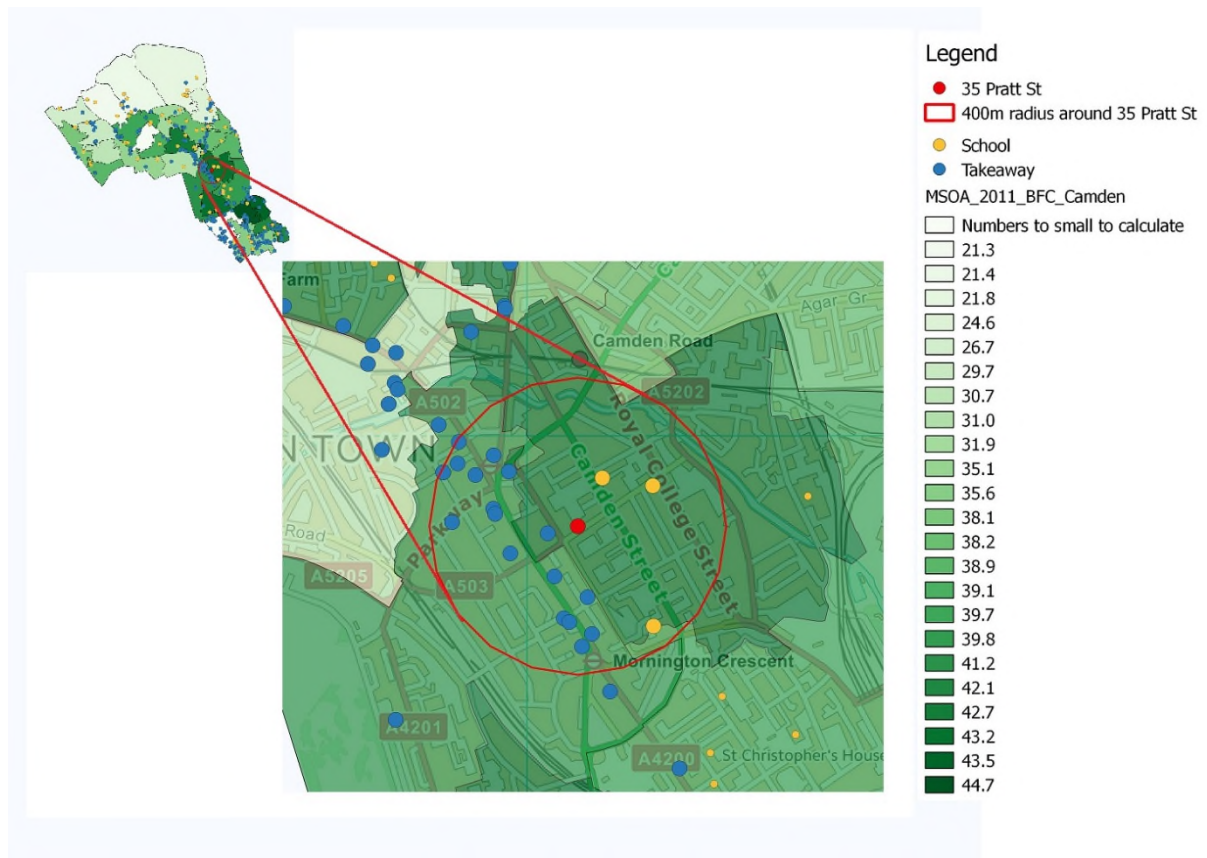
³ Data from the National Child Measurement Programme. Available at <https://fingertips.phe.org.uk/profile/national-child-measurement-programme>

⁴ Middle Layer Super Output Areas (MSOAs) are small geographical areas with an average population of 7,200 residents.

⁵ A small number of MSOAs in England and Camden do not have NCMP data. Where only 1 to 5 children in an MSOA are overweight or obese, Public Health England suppresses the data in accordance with NHS Digital recommendations. If no other MSOA within the local authority has been suppressed due to small numbers then the next lowest value in the local authority has been suppressed to prevent disclosure by differencing from the local authority total.

Lady's schools. The map also demonstrates the concentration of takeaways in the area, particularly along nearby Camden High Street.

Figure 2: Map of Camden showing 35 Pratt St, St Michael's, Our Lady's and Richard Cobden schools, takeaway premises, and the prevalence of overweight and very overweight in Year 6, 2015-2017



Source: Camden Council and NCMP

The Local Plan evidence base for fast food takeaways and health in Camden shows that although the association between fast food takeaways and childhood obesity is difficult to measure, research increasingly supports an association between the proximity and concentration of outlets and overweight and obesity.⁶

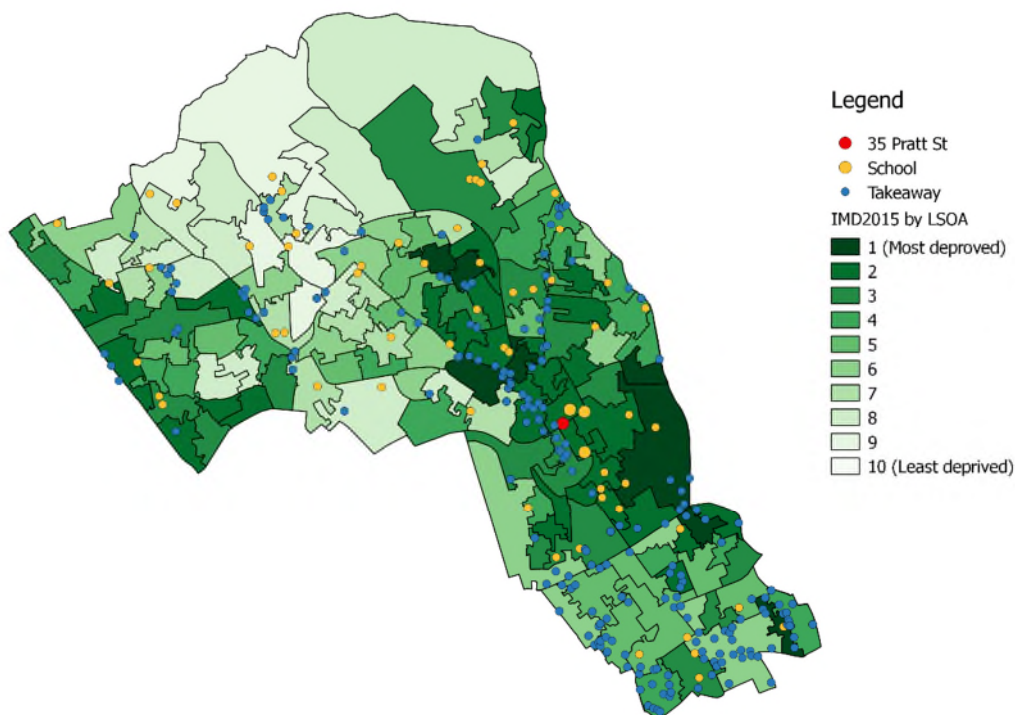
There is little published evidence regarding fast food outlets' proximity to primary schools, however, industry data show that 29% of family visits to fast food outlets are influenced by children's choices in what the NDP Group which carried out the research describes as its "Dine out pester power scorecard".⁷

⁶ Camden Council. Fast food takeaways and health in Camden. February 2016. Available at https://camden.gov.uk/ccm/cms-service/stream/asset/?jsessionid=1B141058400127DE1C30626785167B4F?asset_id=3414521

⁷ NDC Group (December 2014). Pester power drives 763 million family eat-out visits per year in Britain. <https://www.npdgroup.co.uk/wps/portal/npd/uk/news/press-releases/pester-power-drives-763-million-family-eat-out-visits-per-year-in-britain/> (accessed 16th June 2015)

Childhood obesity is strongly associated with deprivation,⁸ and Figure 3 shows that the area around 35 Pratt Street comprises four Lower Super Output Areas (LSOAs)⁹ within the 20% most deprived areas nationally and one within the 30% most deprived nationally. There is strong evidence linking the density of fast food outlets to the level of area deprivation, and the Public Health England data shows higher concentrations of fast food outlets in England's most deprived communities.¹⁰ Given the enormous public health implications of overweight and obesity in the population, significant effort is required to tackle unhealthy weight in children in all local authorities and this is a priority in areas with high levels of deprivation.

Figure 3: Map of Camden showing 35 Pratt St, St Michael's, Our Lady's and Richard Cobden schools, takeaway premises, and the Index of Multiple Deprivation 2015 national deciles by LSOA



Note: No Camden LSOAs are in the 10% least deprived areas nationally.

Source: Camden Council and IMD2015.

The Council seeks to tackle this issue and encourage healthy eating habits. The Council is undertaking a range of programmes aimed at improving the food environment in the borough, consistent with the multi-factorial approach to tackling childhood obesity as outlined in the Foresight Report on tackling obesity.¹¹ While the causes of obesity are complex there

⁸ Conrad D, Capewell S. Associations between deprivation and rates of childhood overweight and obesity in England, 2007 - 2010: an ecological study. *BMJ Open* 2012;2:e000463

⁹ Lower Layer Super Output Areas (LSOAs) are small geographical areas with an average population of 1,500 residents

¹⁰ Public Health England. Fast food outlets: density by local authority in England. 2018. Available at <https://www.gov.uk/government/publications/fast-food-outlets-density-by-local-authority-in-england>

¹¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/287937/07-1184x-tackling-obesities-future-choices-report.pdf

is evidence to support that energy dense fast food is one of a number of contributing factors to obesity.

A range of programmes in improving the food environment in Camden are ongoing, for example:

- Camden's Baby Feeding Service supports parents with the skills needed to initiate breast feeding and/or to start solids.
- Through the Healthy Schools programme, Camden works closely with its schools to support healthy food environments, policies and provision.
- A key part of the Healthy Schools programme is to improve the quality and increase uptake of school meals, particularly among eligible children to ensure every child has a healthy, nutritious meal every day. Building on this, since 2014 Camden has been working with national charity, Magic Breakfast, to support all Primary Schools in the borough to develop healthy breakfast clubs that are free at the point of access, which reach those children most in need, and which aim to be financially self-sustaining within two years. This year existing breakfast clubs will be extended to include peer-led reading schemes to improve literacy as well as nutrition.
- Among older children and young people in particular, we know that fast food with high levels of fat and salt and minimal nutrients is becoming easier to access, cheaper and more acceptable. The Healthier Catering Commitment is a pan-London scheme to encourage businesses to make small changes to the way in which they prepare and serve food to make it healthier. Camden is nearing the end of its two year Healthier Catering Commitment pilot, which is focused in Kilburn and Kentish Town wards and delivered by the Food Safety Team. To date, 25 businesses have achieved the award.
- Camden has also been successful in piloting a "Change 2 Water" policy in secondary school. This addresses the role of fizzy, carbonated, sugary drinks in weight gain through the promotion of drinking water.
- Camden is piloting 'Little Steps to Healthy Lives' in Children's Centres and private, voluntary and independent nurseries. This programme ensures the food environment within these settings conforms to the standards recommended by NICE (2006).

Supporting physical activity

A wide range of actions are being taken forward in response to the recommendations of Camden's children and young people's physical activity needs assessment For example:-

- Apples & Pears is an 8-week weight management service for adults, children and young people offered by the Council.
- Camden Active Spaces is a three year, £1m programme to transform outdoor areas in seven local schools, introducing unique designed structures to inspire children and young people to move more.
- Play streets have been recognised for building community cohesion as well as giving children an opportunity to play actively, outdoors. Launched in November 2014, Camden's Play Streets scheme supports local residents to have their street closed to cars at set intervals to allow local children to play together.
- In Somers Town, a Cycle to School Partnership was formed in 2014 between Camden Transport services, local schools and UCL. The project aims to support children to integrate exercise into their daily routine.

- Increasing activity in children's free time is also a vital part of embedding positive health behaviour from an early age. Camden Active All Areas is a collaborative project led by Pro-Active Camden in partnership with four community centres.

Conclusion

In conclusion, an additional hot food takeaway within 400m of three schools in an area of high deprivation and high prevalence of childhood obesity would represent an unreasonable concentration that is likely to lead to a greater exposure to unhealthy food among pupils which in turn is likely to impact negatively on their health.

Recommendation

It is recommended that the Council refuse this application due to the concentration of existing businesses providing fast food in the immediate area, (four within 200 metres, 11 within 300m, and 20 within 400m of 35 Pratt Street), and the adverse impact of overprovision of fast food in an area with high levels of childhood overweight and high levels of deprivation.