

Healthier Food Environments Supplementary Planning Document

Consultation Statement 2024

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Consultation Statement

This consultation statement has been prepared in accordance with the Town and Country Planning (Local Planning) Regulations 2012. The council has carried out two rounds of public consultation on the Healthier Food Environments SPD. The first round between 6 October 2022 and 17 November 2022 and the second round between 18 December 2023 and 5 February 2024.

Consultation

The council promoted consultation by:

- Using the council's 'Have your say on Planning' webpage to promote the consultation and include links to the documents.
- Sending an email/letter to the Planning Policy consultation database, this includes statutory bodies, ward councillors, key stakeholders and individuals who have requested to be informed of planning policy documents. This email/letter provided a link to the consultation documents and details of how to make comments on them.
- The second round of consultation was also promoted via the council's online consultation platform Let's Talk.

Summary of Consultation Responses

Overall, a total of 33 responses have been received on the Healthier Food Environments SPD; these include representations from the following:

- Hot Food Takeaway operators
- Natural England
- Newcastle Disability Forum
- Northumberland County Council
- Save Newcastle Wildlife
- The Coal Authority
- West End Residents' Association
- Individuals
- Developers

2022 Representations Reference	Summary of main issues raised	How the issues have been addressed
<p>McDonalds</p>	<ul style="list-style-type: none"> • Supports the promotion of healthier living and tackling obesity. • McDonalds creates employment, supports active and healthy lifestyles and has made numerous menu changes to reduce fat, sugar and salt content across their menu. • An exclusion zone is inconsistent with national planning policy. • Restricting hot food takeaways near to schools, parks and youth centres is not positive, justified, effective or consistent. • Inconsistent approach towards new development that sells food and operations with Sui Generis use. 	<p>Support Noted. No changes needed to the SPD.</p> <p>Comments noted. No changes needed to the SPD.</p> <p>Planning Practice Guidance (PPG) which supplements the National Planning Policy Framework (NPPF) states that planning can influence the built environment to improve health and reduce obesity and excess weight in local communities. Planning policies and proposals may need to have particular regard to the following issues including proximity to locations where children and young people congregate such as schools, community centres and playgrounds. Exclusion zones are an effective way of doing this and have been consistently used in planning policy documents across the country. The SPD includes reference to the PPG.</p> <p>In September 2020 the government introduced changes to the Use Classes Order. Use Classes A1, A2 and A3 were effectively replaced with Use Class E (a,b,c). Use Classes A4 and A5 were not covered by Use Class E and became defined as “Sui Generis” (‘in a class of its own’). It is the hot</p>

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	<ul style="list-style-type: none"> • The opportunity for children to access hot food takeaways, as part of a school day, is limited. • No evidence of causal link between the presence of hot food takeaways and schools. 	<p>food takeaway element that the SPD is proposing to control. Use Class E covers several uses which would not be feasible to control. This position has been set out in the SPD.</p> <p>The purpose of the exclusion zones is to limit children’s exposure to hot food takeaways on their route to and from school. The council are aiming to limit exposure to unhealthy food outlets in the food environment. This position has been set out in the SPD.</p> <p>Studies have shown a link between the proximity of fast food restaurants, schools and weight gain. In particular lower income and minority ethnic students were more adversely affected (Engler-Stringer et al. 2014) and measures of proximity to home and school locations (Fraser et al. 2012).</p> <p>Studies have shown that the school environment is one that allows adolescents to make food choices free from parental control (Grier & Davis. 2013). This study also shows a link between the proximity of fast food restaurants, schools and weight gain. In particular, lower income and minority ethnic students were more adversely affected.</p> <p>Studies have strongly suggested links between BMI proximity to fast food outlets (Carroll-Scott et al. 2013), (Davis & Carpenter. 2009), (Fraser et al. 2012). Fraser et al found that increasing fast food consumption led to a decrease in fruit</p>

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	<ul style="list-style-type: none"> • Examination of other plans have found similar policy approaches to be unsound. • Further exploration of policies that are more positive, have a reputable evidence base and comply with the Framework. 	<p>and vegetables. Exposure to an obesogenic environment could lead to subsequent health problems in the future (Patterson et al. 2012). Other UK specific research highlighted small effects showing that the local food environment around secondary schools may influence the diet of adolescents (Smith et al. 2013). Fraser et al. 2012 found a consistent positive relationship between the consumption of fast food and higher BMI scores and increased odds of being obese. Evidence to support the approach to the SPD has been included in the document.</p> <p>There are many examples of this approach set out in adopted Local Plans and SPDs. The SPD sets out a justification for each policy area.</p> <p>The council's Local Plan includes policies to promote active and healthy lifestyles. No changes needed to the SPD.</p>
Individual	<ul style="list-style-type: none"> • Full support for the document. • Agree with the inclusion of primary schools. 	Support noted. No changes needed to the SPD.
Individual	<ul style="list-style-type: none"> • More HFTs are good as they bring competition, diversity, lower prices and employment. • HFTs can fill empty units. 	Whilst it is recognised that hot food takeaways do provide economic and employment opportunities, contribute towards the food offer and occupy units which may have remained vacant, hot food takeaways, when compared to other retail uses, have a greater potential to have a detrimental impact on

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	<ul style="list-style-type: none"> Preventing obesity should be done through education. HFTs food can be healthy. 	residential amenity and environmental quality and typically offer food choices high in fat, salt and sugar. This has been set out in the SPD.
Individual	<ul style="list-style-type: none"> Full support for the document. Concern about children's exposure to unhealthy food close to schools and recreation areas where children congregate. 	Support noted. No changes needed to the SPD.
Individual	<ul style="list-style-type: none"> No new HFTs located within 400m to entry points of primary and secondary schools, parks, youth centres, or leisure centres. No new HFTs located in wards with high levels of childhood obesity – where more than 10% of year 6 pupils are classified as obese. Within a defined centre of <30 units, planning permission should not be granted where the percentage of HFTs exceeds 15%. For centres >30 units the % of HFTs should not exceed 7%. A limit of two HFTs outlets should be allowed with a separation of minimum 3 non-HFTs units to any HFTs. HFTs should not share a party wall with a residential property. 	Comments noted. These policy options have been considered as part of the development of the SPD and where they are justified and are enforceable, have been taken forward.

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	<ul style="list-style-type: none"> • New HFTs or expansion should not increase crime levels, fear of crime or anti-social behaviour. • Information to be submitted with application to show detriment will not be caused to highway safety. • Plans for odour/fume extraction and noise assessments to be submitted. • Late night opening hours not permitted. • Details of internal storage of refuse/waste and fat traps specified. 	
Individual	<ul style="list-style-type: none"> • Full support for the document. 	Support noted. No changes needed to the SPD.
Individual	<ul style="list-style-type: none"> • Control measures paid by the operatives to prevent customers dropping their waste close to point of purchase. • Traffic impact to be considered on HFT proposals. • Assessments to ensure the proportion of healthy food options sold. 	Comments noted. These policy options have been considered as part of the development of the SPD and where they can be justified and are enforceable, have been taken forward.
Individual	<ul style="list-style-type: none"> • Reduce the numbers of hot food takeaways already in existence. 	<p>The SPD is unable to control existing hot food takeaways.</p> <p>The SPD will apply to planning applications for new-build and changes of use, covering hot food takeaways and mixed-use premises where takeaway food sales are not incidental to the main use. This has been set out in the SPD.</p>

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Individual	<ul style="list-style-type: none"> • HFTs located within 400m of primary and secondary school gates, advanced learning centres, colleges, youth and leisure centres. • No new HFTs in wards where 10% or more of children in year 6 are obese or overweight. • Shopping centres/highstreets with <30 units, planning permission should not be granted where the percentage of HFTs exceeds 15%. For centres >30 units the % of HFTs should not exceed 7%. • A limit of two HFT outlets should be allowed with a separation of minimum 3 non-HFT units to any HFT. • HFTs should not share a party wall with a residential property. • New HFTs or expansion should not increase crime levels, fear of crime or anti-social behaviour. • Information to be submitted with application to show detriment will not be caused to highway safety, including adequate safe parking. • Plans for odour/fume extraction and noise assessments to be submitted. Exits from 	<p>Comments noted. These policy options have been considered as part of the development of the SPD and where they can be justified and are enforceable, have been taken forward.</p>

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	<p>extraction systems should not face or be below residential premises or gardens.</p> <ul style="list-style-type: none"> • Late night opening hours not permitted. • Details of internal storage of refuse/waste and fat traps specified. 	
Historic England	<ul style="list-style-type: none"> • No comments to make at this time on the scoping report. • Interested in considering further any specific land allocation proposals and their impact on the historic environment/buildings. 	Comments noted. No changes needed to the SPD.
Individual	<ul style="list-style-type: none"> • Supports the inclusion of primary schools. • Concerns of noise disturbance, double-parking and littering. • Council working with the University and NHS on the proposed Campus for Ageing and Vitality (CAV) site to further this positive action. 	<p>Support noted. No changes needed to the SPD.</p> <p>Comments noted. These points are covered in the SPD.</p> <p>The aspirations for the site support ambitions to improve health and wellbeing, building on the success of the Helix site and the National Innovation Centres for Ageing and Data. Newcastle University Developments Ltd (NUDL) are developing the site to be a leading example of intergenerational living, co-locating education and health to help people live longer and healthier lives through global leadership in aging and research. This will provide innovative solutions for living, leisure, learning and employment. No changes needed to the SPD.</p>

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Individual	<ul style="list-style-type: none"> • Concerns of HFTs contributing to childhood obesity, litter and rat problems. • Adverts at bus stops capitalising on HFTs. 	<p>Comments noted. Childhood obesity levels and disposal of waste included in the SPD.</p> <p>The use of advertisements is an area the council will explore further as part of our whole systems approach to healthy weight, physical activity and nutrition.</p>
Individual	<ul style="list-style-type: none"> • Full support for the document. • Adoption of policy seems to lag behind other authorities. 	<p>Support noted. The council already has an adopted Hot Food Takeaway SPD, this document would replace this.</p>
Individual	<ul style="list-style-type: none"> • Full support for the document. • Policy for promoting better lifestyles and wellbeing for residents. 	<p>Support noted. No changes needed to the SPD.</p>
Natural England	<ul style="list-style-type: none"> • No comments to make on the Healthier Food Environments Scoping Report. • Should the proposal be amended in a way which significantly affects its impact on the natural environment, Natural England to be consulted again. 	<p>Comments noted. No changes needed to the SPD.</p>
Newcastle Disability Forum	<ul style="list-style-type: none"> • HFTs offer valuable service for the community. • If takeaways are not consumed regularly, they are not considered harmful. • HFTs can be cheaper, quicker and a treat. • HFTs add value to the economy and employment. 	<p>It is acknowledged that hot food takeaways can provide a valuable service to local communities and do offer economic and employment opportunities. However, we have to balance the economic opportunities with the costs for society (NHS for example) in treating overweight and obesity issues due to the impact of an obesogenic environment. Public Health are approaching this through a whole systems approach to healthy weight, physical activity and nutrition and a wide</p>

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	<ul style="list-style-type: none"> • Support for polices to include all schools in exclusion zones and over-proliferation. • Controlling menu choices and sugar/salt/fat content. • Involvement of the council's Health Champions in this work. 	<p>number of stakeholders, including Community Champions, will be involved in delivering this. This approach is set out in the SPD.</p>
Individual	<ul style="list-style-type: none"> • The HFT SPD 2016 has not worked. • HFTs with a drive-through close to residential areas increase impacts on residential amenity, highway issues, operation hours including noise, anti-social behaviour and fear of crime. • Data on children passing HFTs on their way to and from school or located close to bus stops/public transport used by children. 	<p>It is considered that the existing Hot Food Takeaway SPD has been successful since its adoption in 2016.</p> <p>We are proposing a more comprehensive approach based on the latest evidence to ensure that planning can continue to support the council's approach to healthy weight, nutrition and physical activity. This has been set out in the SPD.</p>
Northumberland County Council	<ul style="list-style-type: none"> • Policy that will contribute to a general perception across the region of the health issues associated with HFTs and consistently addressed across a wide area. • 'Levels of Obesity' – proposed policy would place restrictions on any ward more than 10% of year 6 pupils classified as obese. Applied to Northumberland this would mean restricting every ward. 	<p>Comments noted. Policy options considered have been based on available evidence including data from NHS Digital and the National Child Measurement Programme. 'Dark Kitchens' have been referenced in the future demands section of the SPD and may require permission depending on how they operate / use class.</p>

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	<ul style="list-style-type: none"> • 'Locations where Children and Young People Congregate – difficulty of determining this. Focussing this on areas close to the school gates, considering footpath routes followed. • Interested in anything emerging on Dark Kitchen given that large-scale operations could serve areas straddling the local authority boundary. 	
Save Newcastle Wildlife	<ul style="list-style-type: none"> • Concerned by number of green spaces lost to built development across the city. • Permission for HFT should be severely restricted given number already existing. • Details of litter management plans secured by condition, implemented and enforced should be set out in the document. • Council improving access to healthy, local, affordable food by allocating more sites for allotments, community growing spaces and gardens. 	<p>Comments noted. These comments are beyond the scope of this SPD.</p> <p>The SPD will apply to planning applications for new-build and changes of use, covering hot food takeaways and mixed-use premises where takeaway food sales are not incidental to the main use.</p> <p>Comments noted. A requirement for litter management plans has been included in the SPD.</p> <p>The council's Local Plan includes policies to promote active and healthy lifestyles including new open spaces, allotments and community food growing opportunities.</p>

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	<ul style="list-style-type: none"> • More holistic approach needed to meet requirements of Policy CS14 Wellbeing and Health when considering new HFT. 	Comments noted, the SPD is part of a wider effort to tackle unhealthy diets and support the council's approach to healthy weight, nutrition and physical activity.
Individual	<ul style="list-style-type: none"> • Full support for the document. 	Support noted. No changes needed to the SPD.
The Coal Authority	<ul style="list-style-type: none"> • Within the Newcastle area there are recorded coal mining features present at surface and shallow depth including mine entries, shallow coal workings, mine gas sites and reported surface hazards. Features pose risk to surface stability and public safety. • Record of surface coal resource present, although this should not be taken to imply mineral extraction would be economically viable, technically feasible or environmentally acceptable. As part of the planning process, consideration should be given to such advice in respect of indicated surface coal resource. • No specific comments to make on Healthier Food Environments Scoping Report. 	Comments noted. No changes needed to the SPD.
West End Residents' Association	<ul style="list-style-type: none"> • Policy to restrict further development of HFTs in locations where children and young people congregate, such as school bus stops. 	Comments noted. These policy options have been considered as part of the development of the SPD and where they can be justified and are enforceable, have been taken forward.

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	<ul style="list-style-type: none"> • HFTs in locations that are highly accessible to children and young people should not be granted permission. • Endorse policy to include primary schools. • Aim of SPD should make environments healthier and more capable of supporting behaviour and choices that encourage weight loss and active lifestyles. 	
Individual	<ul style="list-style-type: none"> • Council should consider health impacts relating to air pollution generated by traffic. • Issue of poor parking/traffic near HFT by enforcing traffic regulations. • Reduce the number/size of HFT. • Prevent drive throughs in residential areas. • Encourage walking and cycling rather than driving. 	Comments noted. These policy options have been considered as part of the development of the SPD and where they can be justified and are enforceable, have been taken forward.

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Hala Ltd	<ul style="list-style-type: none"> • Proposed policy HFE2 is inflexible and restrictive making it difficult for businesses to plan for and invest in prospective sites. 	This policy is considered to be justified and aligns with the approach taken by Gateshead Council. This SPD supplements Policy CS14 of the Core Strategy and Urban

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	<p>This policy is in effect, a blanket ban as the likelihood of the targets coming down below 10% seems unrealistic. The evidence used to justify this policy should be localised evidence. The 10% threshold is not justified.</p> <ul style="list-style-type: none"> • The policy will have implications for centres and shopping parades affecting vitality, footfall and vibrancy contrary to policy DM3. • It should be noted that ‘unhealthy’ food can be easily purchased from use class ‘E’ stores. Primary school children can still buy unhealthy food from convenience stores and cafes. 	<p>Core Plan, which was prepared jointly with Gateshead Council, therefore the aligned approach is considered appropriate. Ward level data is collected every year through the National Child Measurement Programme which measures all pupils in Reception and Year 6 in England. The latest data tells us that we have some wards with less than 10% obesity in Year 6 and Newcastle City Council believe this should be the aspiration for all wards in the city. Policy HFE2 has been amended to exclude Newcastle Retail Centre, as it is a regional destination for major retail and related uses.</p> <p>Whilst it is recognised that hot food takeaways do provide economic and employment opportunities, contribute towards the food offer and occupy units which may have remained vacant, hot food takeaways, when compared to other retail uses, have a greater potential to have a detrimental impact on residential amenity and environmental quality and typically offer food choices high in fat, salt and sugar. This position has been set out in the SPD.</p> <p>Studies have shown a link between the proximity of fast food restaurants, schools and weight gain. Use Class E covers several uses which would not be feasible to control. No changes needed to the SPD.</p>

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	<ul style="list-style-type: none"> • HFE3 is contrary to NPPF para 31 as it is not supported by sufficient data to enable informed decisions to be made regarding the introduction of new hot food takeaways. Gateshead Council have a similar policy but have included an appendix which outlines the average number of takeaways per ward. This data should be published to help inform decision making. • Policy HFE1 will stagnate Sui Generis development across the city which could result in secondary economic and vitality implications. No maps have been produced to show 400m / 10-minutes' walk radius to help inform decision making. • The SPD is contrary to policies DM3 and CS7 of Newcastle's Local Plan. 	<p>Evidence was gathered to justify the policies in the SPD and data will continue to be gathered and monitored to support decision making. Whilst Gateshead Council have included data in their SPD this is only at a specific point in time and will now be out of date. Decision making should be supported by up-to-date information. Policy HFE3 has been amended to exclude Newcastle Retail Centre, as it is a regional destination for major retail and related uses. No changes needed to the SPD.</p> <p>It is acknowledged that hot food takeaways can provide a valuable service to local communities and do offer economic and employment opportunities. However, we have to balance the economic opportunities with the costs for society (NHS for example) in treating overweight and obesity issues due to the impact of an obesogenic environment. Public Health are approaching this through a whole systems approach to healthy weight, physical activity and nutrition. Evidence was gathered to justify the policies in the SPD and data will continue to be gathered and monitored to support decision making. Newcastle Retail Centre is excluded from HFE1 due to its regional role.</p>

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		<p>There are many uses which are appropriate in centres to support their vitality and viability. Hot food takeaways, when compared to other retail uses, have a greater potential to have a detrimental impact on residential amenity and environmental quality and typically offer food choices high in fat, salt and sugar. The Council's approach aligns with Gateshead Council, and the SPD will supplement policies in our joint Local Plan, the Core Strategy and Urban Core Plan. Newcastle Retail Centre is excluded from HFE1, HFE2 and HFE3 due to its regional role for major retail and related uses.</p>
Historic England	<ul style="list-style-type: none"> • Endorse Newcastle City Council's conclusion that it is not necessary to undertake a Strategic Environmental Assessment for this SPD. • No comments on the SPD. 	<p>Comments noted. No further action required.</p>
Natural England	<ul style="list-style-type: none"> • No comments to make on the Draft Healthier Food Environments SPD. 	<p>Comments noted. No further action required.</p>
Newcastle Great Park (NGP) Consortium	<ul style="list-style-type: none"> • Concerned the SPD poses a material threat to the growth, vitality and sustainability of NGP, specifically NGP centre. The NPPF states that planning policy should take a positive approach to centres growth, management and adoption. 	<p>Whilst it is recognised that hot food takeaways do provide economic and employment opportunities, contribute towards the food offer and occupy units which may have remained vacant, hot food takeaways, when compared to other retail uses, have a greater potential to have a detrimental impact on residential amenity and environmental quality and typically offer food choices high in fat, salt and sugar. There are many</p>

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	<ul style="list-style-type: none"> • The Great Park is an emerging centre benefiting from detailed consent for several town centre uses including former use class A5 (hot food takeaway). The centre is a place of employment, leisure and community focus, with further operators planned, potentially including HFTs. • We encourage the council to exercise discretion in the application of this policy as future restrictions would pose a material threat to the growth, vitality and sustainability of the NGP centre. • HFTs can offer healthier food options and NGP residents should have the ability to choose. • The NGP area is in the 40% least deprived areas in Newcastle as such, the introduction of exclusion areas in proximity to locations frequented by children is 	<p>other uses which are appropriate in district and local centres to support their vitality and viability. No changes needed to the SPD.</p> <p>Any planning proposals would have to accord with policies in Newcastle City Council's adopted Local Plan. There are many other uses which are appropriate in district and local centres to support their vitality and viability. No changes needed to the SPD.</p> <p>Any planning proposals would have to accord with policies in Newcastle City Council's adopted Local Plan. No changes needed to the SPD.</p> <p>Unfortunately, it is not possible through planning regulations to control the food options available from HFTs. No changes needed to the SPD.</p> <p>Studies have strongly suggested links between BMI and proximity to fast food outlets (Carroll-Scott et al. 2013), (Davis & Carpenter. 2009), (Fraser et al. 2012). Fraser et al found that increasing fast food consumption led to a decrease in</p>

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	<p>disproportionate, particularly in less deprived areas such as NGP.</p> <ul style="list-style-type: none"> • The vast majority of children of primary school age are likely to be accompanied to and from school by an adult, therefore restricting the access of children to hot food takeaway providers. • HFTs provide a fantastic outlet for young people to develop independence and social skills when purchasing lunch away from school premises. 	<p>fruit and vegetables. Exposure to an obesogenic environment could lead to subsequent health problems in the future (Patterson et al. 2012). Other UK specific research highlighted small effects showing that the local food environment around secondary schools may influence the diet of adolescents (Smith et al. 2013). Fraser et al. 2012 found a consistent positive relationship between the consumption of fast food and higher BMI scores and increased odds of being obese. Whilst it is accepted that more deprived wards have higher obesity levels than more affluent areas, Newcastle in its entirety has greater levels of overweight and obesity than is beneficial to population health. No changes needed to the SPD.</p> <p>Evidence shows that overweight or obese children often come from families who are overweight or obese. The children generally eat the same meals and types of food as their parents or guardians and will often have issues with portion control. Restricting access to hot food takeaways is one means of trying to improve the weight status of children and adults as families. No changes needed to the SPD.</p> <p>Comments noted. No changes needed to the SPD.</p>

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	<ul style="list-style-type: none"> • HFE1 – introduction of exclusion zones will have a negative impact on retail zones in proximity to schools, in addition to reducing employment and enterprise opportunities, and reducing opportunities for school age children to develop independence and autonomy. • HFE2 – the consortium support the need to tackle obesity and nurture healthy food environments, but not all HFTs result in increase in obesity rates, particularly in areas which are less deprived. • HFE3 – NGP centre does not have an over proliferation of HFTs. • HFE4 – the addition of further HFTs would not be excessive given the current limited offer. 	<p>Planning Practice Guidance (PPG) which supplements the National Planning Policy Framework (NPPF) states that planning can influence the built environment to improve health and reduce obesity and excess weight in local communities. Planning policies and proposals may need to have particular regard to the following issues including proximity to locations where children and young people congregate such as schools, community centres and playgrounds. Exclusion zones are an effective way of doing this and have been consistently used in planning policy documents across the country. Newcastle Retail Centre is excluded from HFE1 due to its regional role.</p> <p>Studies have strongly suggested links between BMI and proximity to fast food outlets (Carroll-Scott et al. 2013), (Davis & Carpenter. 2009), (Fraser et al. 2012). Fraser et al found that increasing fast food consumption led to a decrease in fruit and vegetables. Exposure to an obesogenic environment could lead to subsequent health problems in the future (Patterson et al. 2012). No changes needed to the SPD.</p> <p>This policy will be applied on a case-by-case basis, this is set out in the SPD.</p> <p>This policy will be applied on a case-by-case basis, this is set out in the SPD.</p>

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	<ul style="list-style-type: none"> • HFE5 – the consortium are supportive of the council’s objective to reduce clustering of HFTs. • HFE6 – the consortium is committed to creating and protecting a high standard of residential amenity. • HFE7 – given the high standard of pedestrian access across NGP, we anticipate that the inclusion of HFTs will encourage residents to walk to the NGP centre from their homes, with ample parking provided if required. • HFE8 – any retailer at NGP centre must comply with extraction requirements. • HFE9 any retailer at NGP centre must work harmoniously and respectfully with neighbours to minimise disturbance. • HFE10 – the NGP centre benefits from on-site refuse disposal facilities. 	<p>Support noted. No changes needed to the SPD.</p> <p>Comment noted. The SPD includes a residential amenity policy.</p> <p>Comment noted. No changes needed to the SPD.</p> <p>Comment noted. Guidance on Extraction Systems will be included in the SPD appendix.</p> <p>Comment noted. The SPD includes a residential amenity policy.</p> <p>Comment noted. The SPD includes a disposal of waste products policy.</p>

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The Coal Authority	<ul style="list-style-type: none"> No specific comments on this document. 	Comment noted. No further action required.
Individual	<ul style="list-style-type: none"> Healthier hot food takeaways should be encouraged, there are too many unhealthy outlets, particularly in low-income areas. Independent hot food takeaways are more likely to offer better job prospects for employees than fast food chains. They also add character to local high streets, as opposed to fast food chains which have the same branding regardless of their location. 	<p>Unfortunately, it is not possible through planning regulations to control the food options available from HFTs. No changes needed to the SPD.</p> <p>Comments noted. Newcastle Retail Centre is excluded from Policies HFE1, HFE2 and HFE3 in recognition of its regional role.</p>
Individual	<ul style="list-style-type: none"> Tackling unhealthy lifestyles should be at the forefront of council policies. Many of the issues emanating from poor health and fitness cause spiralling poverty. Especially pleased with the breadth of the policy's reach, which will particularly affect the communities of the west end. 	<p>Comments noted. The council's whole systems approach to healthy weight, physical activity and nutrition aims to support individuals, families, and communities to access, adopt and sustain healthier diets. Improving the food environment, including by limiting further growth of hot food takeaways, and the availability of typically high in fat, salt and sugar foods, is part of this approach as set out in the SPD.</p> <p>Comment noted. No changes needed to the SPD.</p> <p>Comment noted. No changes needed to the SPD.</p>

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	<ul style="list-style-type: none"> • Several national policy reports have been cited in this section, all looking into the effects of obesity and unfitness, with recommendations for action. There seems to have been a lot of talk and very little action at government level. • Impressed, and appalled, by the granular data gathered in this report, which gives incontestable evidence that multi-level change is needed. • We have been looking for this leadership in the west end for some years and are pleased to see it being tackled on all sides. • A pity that new applications from existing take-away businesses can continue without new planning permission. • HFE2: very pleased that the opening of fast food takeaways will be curtailed in areas where 16% of year 6 pupils are deemed obese. 	<p>Comments noted. No changes needed to the SPD.</p> <p>Comments noted. No changes needed to the SPD.</p> <p>Comments noted. No changes needed to the SPD.</p> <p>Comments noted. The SPD is unable to control existing hot food takeaways.</p> <p>Support noted. Newcastle Retail Centre is excluded from HFE2 due to its regional role.</p>

2023/24 Representations Reference	Summary of main issues raised	How the issues have been addressed
	<ul style="list-style-type: none"> • HFE3 & 4: very pleased that over proliferation and over-concentration levels are being addressed. • HFE6 / 7 / 8 / 9: would have stopped in its tracks the proposed drive-through take away application in the west end. • Concerned about Dark Kitchens and wonder whether legislation has to get ahead of the game before premises become established. What are other local authorities doing in this respect? • Thank you for a thorough and well-thought out report. 	<p>Support noted. Newcastle Retail Centre is excluded from HFE3 due to its regional role.</p> <p>Comments noted. No changes needed to the SPD.</p> <p>Dark kitchens are catering venues typically located in employment areas with the sole purpose of providing takeaways for delivery only with no visiting patrons. All policies in this SPD will apply to all sui generis uses and include any proposal where an element of hot food takeaway use is carried out from the premises. The SPD has been amended to reflect this.</p> <p>Support noted. No changes needed to the SPD.</p>
Individual	<ul style="list-style-type: none"> • Agree with the aims. • I love the detail e.g., ratio of waistlines to takeaways. • Having fought against a drive thru takeaway in the old police station, 	<p>Support noted. No changes needed to the SPD.</p>

2023/24 Representations Reference	Summary of main issues raised	How the issues have been addressed
	Westgate Road, these policies would help us in the future.	
Individual	<ul style="list-style-type: none"> • Seems a comprehensive document. • This draft document covers all the concerns raised and hopefully it is fully implemented. 	Support noted. No changes needed to the SPD.
Individual	<ul style="list-style-type: none"> • The document would benefit from an easy to read introduction that summarises the key points of the rest of the document. This would make it more accessible to the general public and those that are not familiar with the technicalities of the planning system. • Currently the document is quite hard to read and understand. It is full of acronyms and expects the reader to have a high level of background knowledge about the planning system and relevant policy. • Pleased to see that permission will not be granted within 400m of a school, community centre, leisure centre or park. • Support the council in creating this draft document. It is important to limit the proliferation of fast-food outlets and the 	<p>Comments noted. SPDs often need to be written in complex English due to statutory requirements, and the technical nature of the subject matter. A Plain English summary of the main points covered in this SPD will be prepared and published alongside the adopted SPD.</p> <p>Unfortunately, SPDs can be quite technical as they supplement existing planning policies. A Plain English summary of the main points covered in this SPD will be prepared and published alongside the adopted SPD.</p> <p>Support noted. No changes needed to the SPD. Newcastle Retail Centre is excluded from HFE1, HFE2 and HFE3 due to its regional role.</p> <p>Support noted. No changes needed to the SPD.</p>

2023/24 Representations Reference	Summary of main issues raised	How the issues have been addressed
	<p>negative impact that this is having on the health and wellbeing of the surrounding population.</p> <ul style="list-style-type: none"> • The planning restrictions make sense and should help to deal with this problem. 	<p>Comment noted. No changes needed to the SPD.</p>

Consultation Summary

Overall, a total of 33 responses have been received during the preparation of the Healthier Food Environments SPD.

- **Scoping SPD Consultation** – was carried out from 6 October 2022 until 17 November 2022. 23 responses were received from organisations, individuals, statutory consultees and community groups.
- **Draft SPD Consultation** – was carried out from 18 December 2023 until 5 February 2024. 10 responses were received from organisations, statutory consultees and individuals.

A summary of the main comments raised:

- Supportive of policy to tackle obesity and unhealthy living.
- Supportive of the inclusion of primary schools and other locations where children and young people congregate.
- Concern of impact on jobs and employment.
- Greater reference to supporting healthier and active lifestyles.
- Considering transport routes children and young people take to and from school where HFT can be accessed.
- Restricting HFT where children and young people congregate, such as bus stops.
- Clarity of guidance.
- Reduce the number of existing Hot Food Takeaways.
- Concern on the impact on centres, particularly emerging centres.
- Lack of evidence to justify approach and some of the proposed policies.
- Concern some of the policies are contrary to adopted local plan policies.
- The policies are too restrictive.
- Support for the approach and policies proposed.
- Support for healthier hot food takeaways.

Conclusions following Consultation

The majority of comments received were in support of the SPD and the proposed policies. There were some comments opposing some of the proposed policies, particularly on the role hot food takeaways play within centres, providing employment opportunities and supporting the vitality and viability of centres. In response to these comments, the Newcastle Retail Centre due to its regional role as a major destination for retail and related uses is exempt from policies HFE1, HFE2 and HFE3 in the SPD.

The council considers that the approach taken is compliant with the council's adopted Local Plan (Core Strategy and Urban Core Plan and the Development and Allocations Plan) and national planning policy and is supported by appropriate evidence. Evidence will continue to be gathered to help inform decision making in relation to future planning proposals.

The comments made have been considered and where possible have resulted in the development of detailed policies. The policy options included in the SPD are considered to be justified and are enforceable.