



Bristol City Council Local Plan Review

Takeaways - Topic paper



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Introduction

1. This topic paper seeks to provide supporting information and justification for the inclusion of **Policy HW3 Takeaways** in the local plan review.
2. This topic paper situates the policy within the national and local context and identifies the evidence available, including relevant policy and guidance, that has informed the policy approach. This topic paper also reviews and comments on feedback that has been received in response to consultation on the draft policy at Regulation 18 stage.

Local plan review background

3. Bristol City Council currently has an adopted Local Plan which comprises of the following documents:
 - The Bristol Core Strategy (2011).
 - The Site Allocations and Development Management Policies (2014).
 - The Bristol Central Area Plan (2015).
 - Supplementary planning guidance.
4. The adopted Local Plan contains two policies with relevance to the health impacts of hot food takeaways:
 - Policy DM10 Food and Drink Uses. This policy seeks to limit the development of takeaways in close proximity to schools and other youth facilities, defining ‘close proximity’ as being within 400m.
 - Policy DM14 The Health Impacts of Development. This policy aims to prevent development which would have an unacceptable impact on health and wellbeing. It requires development to consider its impact on health and wellbeing and in some instances provide a health impact assessment.

Policy HW3: Takeaways - overview

5. Policy HW3 has been consulted upon as part of the local plan review process twice, in 2018 and 2019. It builds on existing requirements in the local plan. By drawing existing requirements out into a specific policy and providing greater detail as to its application, HW3 will better support the council’s wider public health ambitions which are considered material to the consideration of planning applications. Policy HW3 seeks to manage the development of takeaways within walking distances of places where young people gather, in such a way as to limit children’s exposure to the influences on making less healthy food choices. Furthermore, the policy aims to prevent concentrations of takeaways which can harm the health of all sections of the community through reducing choice and opportunities for less healthy food choices and prevents such outlets from dominating the offer within local centres.
6. The effect of the policy is that proposals for takeaways located within approximately 5 minutes walking distance of schools, youth facilities or other locations where young

people gather would not be permitted if they would be likely to have a harmful influence on health. Additionally, proposals for takeaways would not be permitted where there would be a harmful concentration within a retail centre including if the development would result in three or more adjacent takeaways.

7. The policy supports the aims of Bristol City Council in improving health and wellbeing, tackling obesity (particularly childhood obesity) and reducing health inequalities in the city. Policy HW3 seeks to help achieve Bristol City Council objectives to stop the increase in childhood obesity and to close the childhood obesity gap in which children in more deprived areas are more likely to be obese than those in less deprived areas.

The policy also identifies possible amenity impacts on an area which will be taken into consideration when assessing a takeaway proposal, including:

- The impact of noise and general disturbance, fumes, smells, litter and late-night activity, including those impacts arising from the use of external areas;
- The impact on highway safety;
- The availability of refuse storage and disposal facilities; and
- The appearance of any associated extensions, flues and installations.

The policy indicates that where appropriate, the council will require conditions be placed on any permission to mitigate these potential impacts.

Justification for policy approach

National policy background

National Planning Policy Framework

8. The National Planning Policy Framework (NPPF) (September 2023) has three key objectives for achieving sustainable development. One of these – the social objective – seeks to support strong, vibrant and healthy communities, in which an environment is created which supports communities’ health, social and cultural well-being. It states that the three objectives should be delivered both through the preparation and implementation of plans and the application of the NPPF policies.

9. Section 8 of the NPPF provides a more specific framework for health, stating in paragraph 92(c) that planning policies and decisions should (emphasis added):

*‘enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, **access to healthier food**, allotments and layouts that encourage walking and cycling.’*

10. The NPPF also states at paragraph 93(b) that the planning policies and decisions should take into account and support the delivery of local strategies which seek to improve health, social and cultural wellbeing of the community.

National Planning Practice Guidance

11. The national Planning Practice Guidance (PPG) Healthy and Safe Communities sets out further guidance on the relationship between planning policy and decision-making, and health. It states that ‘a healthy place is one which supports and promotes healthy behaviours and environments, and a reduction in health inequalities for people of all ages’.

12. The PPG also, crucially, sets out explicitly the role that planning can have in creating a healthier food environment, stating that it can influence the built environment to reduce obesity and excess weight, and improve health, in local communities. It states that local planning authorities can have a role in supporting communities to access a wide range of healthier food production and consumption choices. This includes the use of planning policies and supplementary planning documents which seek to limit the proliferation of particular uses, where this is justified and evidenced as appropriate (and where such uses would require planning permission) (paragraph: 004).¹

13. The PPG states that such policy may need to have regard to the particular issues of:

- Proximity to locations where children and young people congregate such as schools, community centres and playgrounds.

¹ PPG Healthy and Safe Communities

- Evidence indicating high levels of obesity, deprivation, health inequalities and general poor health in specific locations.
- Over-concentration of certain uses within a specified area.
- Odours and noise impact.
- Traffic impact.
- Refuse and litter.

14. The PPG identifies measures which local authorities should consider for proposed takeaway developments to help control the litter associated with hot food takeaway and ensuring there is no unacceptable impact of litter to the amenity of the area.

Such measures include:

- Proposals to include litter bins.
- Advisory signage.
- Requiring commitments to undertake litter picking in the wider area.

14. Considering the wider effect on local amenity, Councils can ask premises to undertake litter picking to collect litter (generated from off-sales from that premises) which has been deposited further away from the immediate vicinity. It will, subject to meeting the relevant tests of conditions, often be appropriate to impose conditions to require ongoing compliance with any measures proposed (PPG paragraph: 013)

Local evidence: Bristol health profile

15. Although having a lower rate than the national average, over half of the adult population in Bristol is overweight or obese (55.7%). There are significant disparities across the city in terms of healthy weight, and other key health indicators. The prevalence of excess weight in Bristol is relatively stable; however, amongst deprived groups there is a continuing trend towards obesity. Bristol also suffers from varying levels of access to healthy food, with a number of food deserts across the city.²

16. Additionally, just under half of Bristol residents eat the recommended five portions of fruit and vegetables a day, with areas of deprivation typically exhibiting lower rates. This is a trend which appears to be worsening, with nearly a quarter of people living in the 10% most deprived areas of Bristol buying less healthy food over the last year. In areas such as Hartcliffe and Withywood, more than a quarter of households bought less healthy foods than the previous year.³

17. As part of a wider effort to improve health and wellbeing across the city, Bristol City Council has acted in recent years to improve the city's food system. In 2021, Bristol was named a Gold Sustainable Food City by the UK partnership programme Sustainable Food Cities, making it the second city in the UK to achieve this status. The award focuses on

² Bristol City Council, 'Bristol Quality of Life Survey 2022/23', 2023 ([JSNA 2022.23 - Healthy Weight \(bristol.gov.uk\)](https://www.bristol.gov.uk/jsna-2022-23-healthy-weight))

³ Ibid.

reducing food waste, community action, growing Bristol's good food movement, buying better, urban growing, eating better and food equality.

18. The council has also taken other actions towards this end, including the Bristol Eating Better Award – an award for food businesses and schools that provide healthier food options and promote sustainability. The council is also continuing its cooperative work with organisations including the Bristol Food Network, the Bristol Green Capital Partnership and Resource Futures. The council is also a major partner in the One City Plan – Bristol's city-wide and collaborative vision for Bristol's future; and the One City Plan includes the ambition for a healthier Bristol where citizens are supported to make healthier choices.

19. To support the progress made so far, the Policy HW3 is intended to build on the requirements in existing local plan policy and ensure proposals appropriately consider the potentially harmful impacts of the development of takeaways and helps promote healthy and safe communities.

20. There is a strong evidence base of policy and strategy in Bristol City Council relating to the creation of healthy weight environments and tackling obesity, including amongst children and through schools.

Joint Strategic Needs Assessment (JSNA)

21. The JSNA reports on the health and wellbeing needs of people in Bristol, bringing together detailed information on local health and wellbeing needs, and identifying projected future needs or challenges. It is led by BCC Public Health but includes other services and organisations, including the NHS Clinical Commissioning Group and other partners.

Excess weight in children

22. The JSNA profile on Healthy Weight in children for 2022/23 shows that in Bristol, approximately 1 in 5 children in reception (4-5 years old) and 1 in 3 children in year 6 (10-11 years old) have excess weight (are overweight or very overweight). The data shows that in 2022/23 the prevalence of excess weight for reception pupils in Bristol was lower than the national average in 2021/22, but statistically similar to the national average for year 6 students.

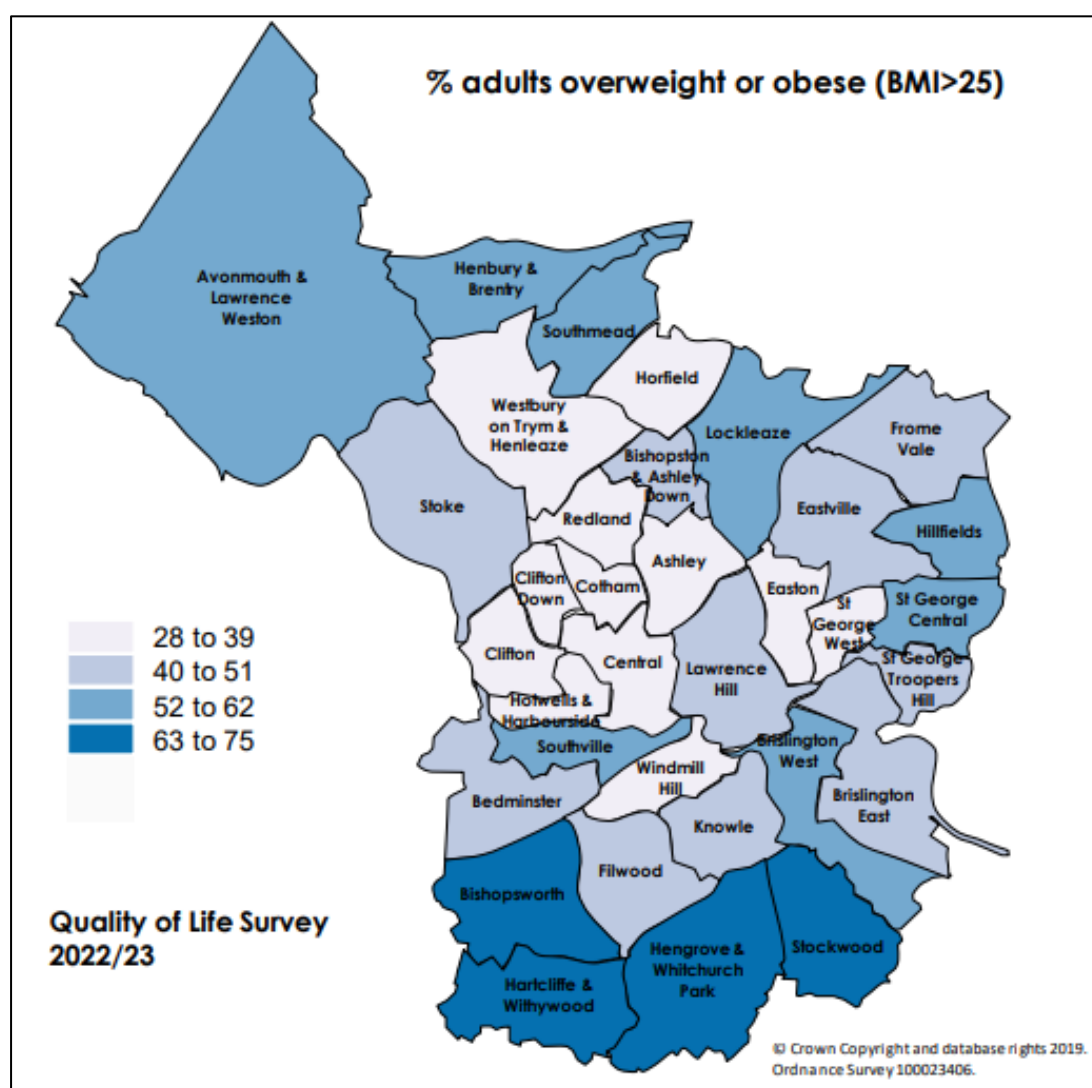
23. Bristol has the lowest rates of excess weight in children at both reception and year 6 age of the eight 'Core Cities'. However, the data shows that there has been little change in excess weight rates in the city over the decade and figures have remained static. Thus, while the issue of excess weight in children in Bristol does not appear to be a worsening issue, it is also not improving and remains at national average levels, which are themselves considered too high by health authorities.

24. The JSNA data evidences that there is a consistent association in Bristol between deprivation and prevalence of excess weight amongst both age groups.

Excess weight in adults

25. The JSNA profile on healthy weight in adults for 2022/23⁴ finds that over half the adult population in Bristol are overweight or obese (55.5%), however this is lower than the national average and the lowest of the Core Cities. It is noted that self-reported data indicates this to be much lower (47.5%). The data finds that deprivation is associated with a higher risk of excess weight in Bristol, however factors such as age, disability, gender and ethnicity also affect the likelihood of an individual to be overweight or obese. The JSNA demonstrates variation across wards, in which a much lower than average rate of excess weight in a ward such as Clifton Down (18%), can be compared with a rate of around 60% in more deprived areas such as Hengrove and Whitchurch Park, Southmead and Stockwood or obese by deprivation)

Rates of excess weight in Bristol by ward (source: JSNA 2022/23)



⁴ [JSNA 2022.23 - Healthy Weight \(bristol.gov.uk\)](https://www.bristol.gov.uk/jsna-2022-23-healthy-weight)

Prevalence of obesity and hot food takeaway premises in Bristol

29. The most recent data analysis published by the Joint Strategic Needs Assessment (JSNA)⁶ in Bristol shows that the city has rates of excess weight and obesity in children which are in line with the national average (see **Appendix D**). Approximately 1 in 4 children in reception (4-5 years old) in Bristol is overweight or obese, and that 1 in 3 children in year 6 (10-11 years old) is overweight or obese. While noting that amongst the 8 'core' cities in England, Bristol has the lowest obesity rates amongst children, the rate in Bristol has remained relatively static over the last decade. There is also a consistent correlation in the city between levels of deprivation and the prevalence of overweight and obese children.

30. Amongst the adult population, the JSNA shows that Bristol has a below-average prevalence of overweight and obese residents, however there are significant differences at ward level correlating to rates of deprivation⁷. This is mirrored in data measuring both dietary intake and the number of takeaway outlets⁸. Deprived areas of the city are more likely to have residents who do not eat sufficient fresh fruit and vegetables; who exceed maximum recommended intake of sugar; and, who have a higher number of takeaway premises in their area (outside of the city centre).

31. The Food Environment Assessment Tool (FEAT) further identifies that regionally, Bristol has the highest number of takeaway outlets per 1000 of the population than any other local authority in the South-West. A limited baseline desk-top survey carried out for the purposes of this paper (see **Appendix E**) sets out that amongst 14 local centres in Bristol, an average of 18% of their commercial units occupied by takeaway outlets, and that they account for 71% on average of all food and drink outlets.

Food Retail and Takeaway Data

The Food Environment Assessment Tool (FEAT)⁹

32. FEAT has been developed by the Centre for Diet and Activity Research (CEDAR) and the University of Cambridge and provides data on the geography of food retail access across England, Scotland and Wales. It is designed to support planning decisions and generate local evidence for strategy and policy, as well as measure change over time and identify where to target interventions.

33. The FEAT tool shows that as per data in June 2018, Bristol had a higher number of takeaway food outlets per 1000 of the population than surrounding local authorities (1.34/1000). This represents a slight increase in the figure in 2014 (as far as the FEAT data

⁶ <https://www.bristol.gov.uk/documents/20182/3849453/JSNA+2019+-+4.7+Healthy+Weight+FINALv2.pdf/46e6b3d7-9b07-a584-bbbe-9cc9a22af021>

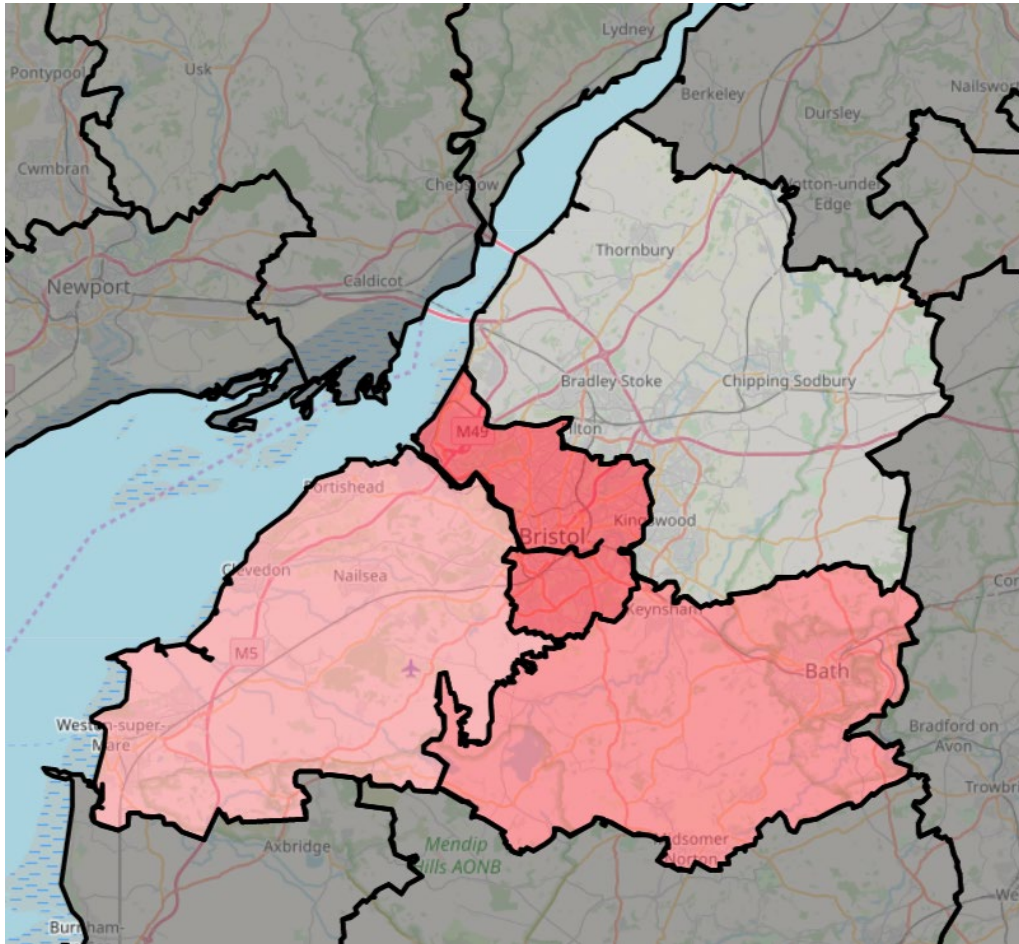
⁷ <https://www.bristol.gov.uk/documents/20182/3849453/JSNA+2019+-+Healthy+Weight+%28Updated+Oct+19%29.pdf/8aa49636-df69-59ed-d91c-0c61a7114103>

⁸ <https://www.bristol.gov.uk/documents/20182/3849453/JSNA+2019+-+Healthy+Eating+%28Updated+Sep+19%29.pdf/4db3cb71-d6eb-e030-6fa5-79134ddf7ce3>

⁹ <https://www.feat-tool.org.uk/>.

measures) which was 1.27/1000. This also represents the highest rate within the south-west region.

Figure 1 Density map showing takeaways per 1000 of the population, comparison to neighbouring authorities (Source: FEAT)



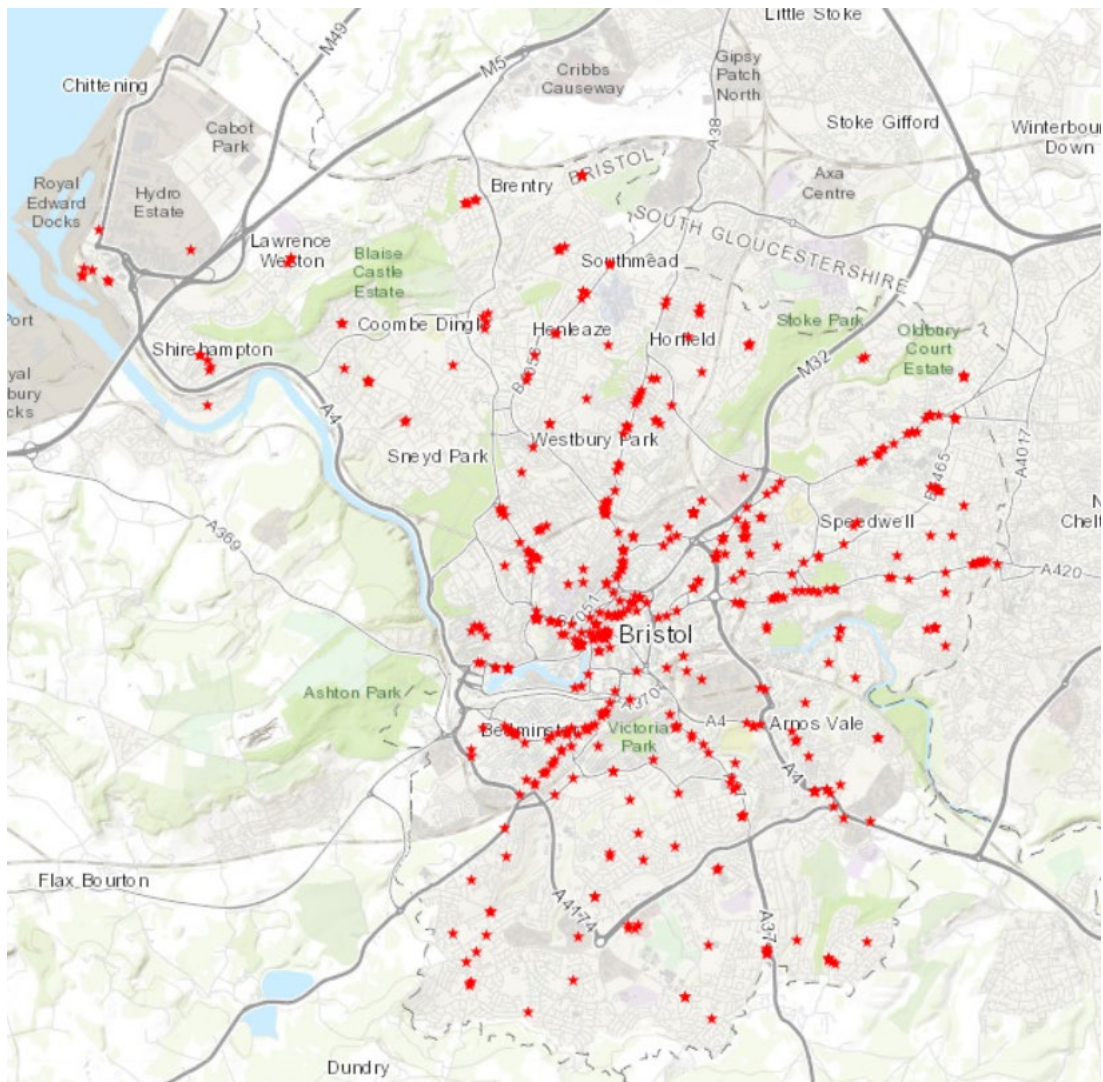
Bristol Food Environment Tool¹⁰

34. Bristol City Council also has a tool for understanding the food environment across the city. A GIS tool, it enables the exploration of the geography of types of food outlet and related features such as allotments and food banks, as well as the location of schools and community facilities.

35. The geographic spread of takeaways, as shown below, demonstrates the tendency for takeaway uses to cluster, particularly along roads and high streets.

¹⁰ <http://bcc.maps.arcgis.com/apps/webappviewer/index.html?id=3b2d87e963624c92b5b75ec57c3e18b1> f

Distribution of takeaways in Bristol (source: Bristol Food Environment Tool)



Summary

36. The most recent data on obesity in Bristol identifies that the city reflects national averages of obesity, the reduction of which is a major public health priority of the Government. Furthermore, the inequality of health outcomes in Bristol is reflected in its rates of overweight and obese residents, with a marked difference between the most and least deprived wards. Comparable to other local authorities in the region, Bristol has a high number of takeaway outlets as a proportion of the population.

37. It is considered that there is clear local evidence and justification for the inclusion of a hot food takeaways planning policy relating to health in the updated Bristol Local Plan. This policy would be, as per national recommendations, situated within the context of a whole systems approach that the Council has adopted to tackling the issue of obesity, poor diet and equality of access to healthy food. As mentioned previously, the Council has multiple cross-sector initiatives running concurrently to address the causes of obesity and

implement measures which seek to improve residents' ability to choose healthier lifestyles and diets. This is situated within the overarching One City Plan which seeks, in part, to improve the health and wellbeing of Bristol by 2050, reduce inequalities and promote a more sustainable food system.