



ORGANISATION	McDONALD'S
ID	2650
MATTER	M91 HOT FOOD TAKEAWAYS

Overview

1. McDonald's has played a proud part in London's history since 1974 when we opened our first UK restaurant in Woolwich, and our UK headquarters in Hampstead in the same year (relocating to Finchley in 1978). Nearly half a century later there are 183 McDonald's restaurants in London, directly employing over 15,000 people, and contributing £540 million in revenue to the city's economy.
2. As the city has grown and changed, so have we. Our continued growth and success in the UK is inextricably linked to London's. Our longevity as a London business means we share many of the policy aspirations of the Mayor and our scale can help make a positive impact on a range of London-wide issues, from access to sport to waste reduction.
3. In responding to the draft London Plan, our goal was to demonstrate how we can work in partnership with the Mayor, the GLA and London councils to ensure the city's continued success.
4. We have always been clear that we share the Mayor's ambition to reduce childhood obesity in the capital and believe there are few restaurants operating in London who can claim to have made so many positive changes to support healthier lifestyles. We have a strong track record of using our expertise in product reformulation, marketing and in supporting community and sporting activities to encourage our customers to make healthier choices.
5. On this particular policy however (M91 Hot Food Takeaways), we do believe it is worthy of further consideration.
6. As it stands, our view is that policy M91, while well intentioned, is inconsistent, discriminatory and disproportionate. In addition, national policy contains no support for a policy approach containing a blanket ban or exclusion zone for A5 (or indeed any other) uses.
7. We have therefore proposed an alternative policy approach that would broaden the criteria used to determine an application. It is an approach that would allow Boroughs the discretion to consider criteria based policies that assess impacts of proposals in the particular circumstances of each case.
8. Given McDonald's track record of investment in London, as well as in product reformulation, investing in community and sport activities and encouraging customers to make healthier food choices, we hope the Inspectors will seriously consider our proposition in full.



Are policies E9C and E9D relating to proposals containing hot food takeaways justified and consistent with national policy and guidance about healthy communities and limiting the proliferation of certain use classes in identified areas, in particular:

a) Is the development of hot food takeaways and associated planning conditions a matter of strategic importance to London, or a detailed matter that would be more appropriately dealt with through local plans or neighbourhood plans?

9. McDonald's has 183 restaurants across London, with a presence in every Borough, and we are proud to be responsible neighbours in all of these communities. Our scale in the Capital also gives us an insight into the profiles and challenges of, not just individual boroughs, but neighbourhoods and high streets.
10. These vary from place to place – whether it is age and income, public health outcomes, traffic and the build environment, crime and anti-social behaviour or access to parks and open spaces. We believe communities, and their local representatives, are best placed to respond to these issues and should be empowered to do so.
11. This is not to denigrate the strategic importance of maintaining and enhancing the vitality of London's high streets and town centres. However, the scale and form of hot food takeaway development in Westminster is different to development in Barking. It is common sense for London's councils to deal with this issue through their local and neighbourhood plans.

b) What evidence is there indicating high levels of obesity, deprivation and general poor health in London?

12. McDonald's fully supports the policy aim of promoting healthier living and tackling obesity. However, the proposed policy approach is not a sound or evidence-based way of achieving this aim – in fact it has been found to be unsound by several planning inspectors.
13. We are aware of a number of studies which highlight issues of obesity, poor health and their connection to deprivation. However, as stated above, our strong belief is that the solutions put forward so far to respond to this challenge, while well intentioned, have failed.
14. A review of publicly available public health data shows that, where they have been introduced, school proximity policies have not delivered noticeable improvements to childhood obesity rates. For example, in the case of Waltham Forest, which introduced a school proximity policy in 2008, the Public Health England data for the Borough shows that there has been no discernible impact on childhood obesity rates – with these actually worsening in recent years. The borough's Health Profile for 2017 records childhood obesity (year 6) at 26.1% up from 20.3% in 2012, the year London hosted the Olympic Games.
15. While it is accepted that the causes of obesity are complex, the exclusion zone policy has had no discernible effect in Waltham Forest. It is clear that more research and investigation is needed before such a policy approach can be justified by evidence. The test of soundness requires policy to be evidence based. However, there is no evidence of any causal link between the presence of A5 uses within 400m of schools and increases in obesity or poor health outcomes.
16. There is also a risk that the policy, as currently drafted, may have unintended consequences such as pushing young people to buy more sugary snacks from supermarkets and other outlets as opposed to from takeaways. Policy E9 does nothing to address the supply of hot food high in fat, salt or sugar (HFSS) from other outlets that operate under A1, A3 and A4.



17. Essentially, the policy takes an inconsistent approach towards new development that sells food, and discriminates against operations with an A5 use. Given the objectives of the policy, it ought to apply equally to all relevant food retailers.
18. As such, we believe this warrants further investigation. As set out in our response to the London Plan, we would be keen to partner with the Mayor and local authorities to fund a study into young people's snack choices and to determine the best measures to effectively intervene to reduce childhood obesity.

c) What evidence is there of over-concentration and clustering of hot food takeaways in London?

19. We recognise that part of the original intent behind over-concentration and clustering policies was to reduce the number of hot food takeaway premises in urban and suburban centres. As stated above, we believe this is too sweeping and reject the underlying assumption that all hot food takeaways are alike and will have the same impact locally.
20. Unlike many other A5 premises, McDonald's is a major local employer and one of the few global corporations that continue to anchor itself in urban and suburban town centres. We take our responsibilities to litter, anti-social behaviour, noise and hygiene very seriously and believe our presence on a high street contributes to the vibrancy and vitality of London's town centres.
21. Implementing a blanket policy that prohibits the growth of all A5 premises is not progressive. It punishes businesses like McDonald's which have taken considerable steps to promote healthier food choices and does not allow the flexibility for other hot food takeaways to bring in healthier options.
22. A blanket 400m school proximity policy for London also has the perverse effect of potentially increasing clustering and over-concentration as the number of available sites for new restaurants in the Capital decreases dramatically.
23. In our response to the Draft London Plan, we recommended developing an alternative policy proposal that allows Boroughs the discretion to introduce criteria-based policies that assess the actual impacts of proposals in the circumstances of each case. We recommend these criteria consider the following:
 - The range of food and drink options on offer, including the nutritional content of the food;
 - The extent of nutritional information made available to potential customers;
 - The food provenance, quality and cooking methods used;
 - The extent to which the proposals supports healthy living;
 - The content and likely effect of any measures proposed to mitigate health impacts or otherwise support healthy living; and
 - Any other impacts of the proposals which may have an effect on health and wellbeing, including the economic, environmental and social impacts of the proposal.
24. This alternative approach would ensure that development plan policies adopted at the Borough level were evidence based and that planning applications were only allowed – or only refused – where the evidence justified it. It would result in a more progressive and fairer policy approach. It would also ensure that the underlying aims of promoting healthier living and tackling obesity were met in a positive way without undermining the social, economic and environmental benefits that some development involving A5 uses could bring.



25. As stated in our response to the London Plan, we believe the more challenging – but ultimately more effective – approach should be to improve those examples of bad takeaways by helping them to promote healthier options and explore reformulation to reduce unwanted salt and sugar. Nobody has been as successful at this as McDonald's and we would be delighted to share our experiences to help other takeaways achieve our standards. We also await with interest the next iteration of the Healthier Catering Commitment.
26. We recognise that there are less responsible A5 businesses than McDonald's – those which pay little regard to promoting healthy or more balanced options. However, by assuming all hot food takeaway operators are the same, this policy may disincentivise other A5 premises from adopting healthier menu options and reduce the positive impact businesses like McDonald's bring to communities across London.
27. In addition, national policy contains no support for a policy approach containing a blanket ban or exclusion zone for A5 (or indeed any other) uses. Such an approach conflicts sharply with central planks of Government policy such as the need to plan positively and support economic development, and in particular the sequential approach that seeks to steer town centre uses – which include A5 uses - to town centres.

d) Would restricting development of hot food takeaways within 400 metres walking distance from the entrances and exits of existing and proposed primary and secondary schools positively support the delivery of policy GG3 “creating a healthy city”?

28. As outlined above, this question assumes all hot food takeaway operators are the same. We believe we have demonstrated through our responses here - and our submission to the Draft London Plan consultation - that they are not, and this should be reflected in policy.
29. McDonald's fully supports the policy aim of promoting healthier living and tackling obesity. In fact, we are proud of our track record on nutrition, reformulation and promoting healthier meal choices. This, along with the jobs our restaurants create, the community leadership of our franchisees on issues like sport and litter, and our investment in London's town centres and high streets, makes us a responsible operator whose presence contributes towards policy GG3.
30. We recognise that there are other A5 operators that do not have the same impact in their local communities. Many of these operators have also not gone to the same lengths as McDonald's to reduce sugar, salt and fat content in their menus, or encourage healthier meal choices. Restricting proliferation of these operators would support policy GG3.
31. This, however, is why a broader definition for A5 premises is needed, one which distinguishes between responsible operators like McDonald's and others. Good policy should reward and encourage good behaviour from business. As it stands Policy E9 punishes everyone and neither addresses the root cause of the problem nor supports delivery of policy GG3, as demonstrated through the experience of Waltham Forest.
32. As well as a broader definition for A5 premises, we want to make our experience and expertise available to the Mayor, GLA and London councils to help less responsible operators offer healthier meal choices.
33. In summary, we do not believe that in all cases restricting the development of hot food takeaways within 400 meters walking distances from the entrance and exits of primary and secondary schools would positively support the delivery of creating a healthier city.



34. As set out above, we share the ambition to improve health outcomes and believe responsible businesses, such as McDonald's, that operate under A5 can make a significant contribution to the creation of vibrant and healthy communities.