

**RECONSULTATION Public Health response to Havant Borough Council:
Mixed-use development comprising 191 apartments and two drive-through
restaurants, together with associated access, parking and landscaping (Ref:
APP/20/00658)**

Thank you for the opportunity to comment on this re-consultation. The specific document to which we refer is that which is titled “McDonald’s UK & Ireland comment on Public Health response to Havant Borough Council: Mixed-use development comprising 191 apartments and two drive-through restaurants, together with associated access, parking and landscaping”.

We thank the consideration of colleagues at McDonald’s UK and Ireland for their detailed response regarding this new development. We take these comments into account, and reiterate our support regarding the opportunities for employment enrichment in the Havant area. However, with all due consideration, we are unable to endorse the message that McDonald’s represent a key player in improving healthy food environments, and by extension, public health in Havant and nationally. Ergo, we maintain our opposition to both the development of McDonald’s and Costa Coffee drive-thru facilities opposite the proposed apartment blocks.

We respond henceforth to specific comments, but we continue to honour and expand on the validity of evidence provided in our original statement.

As of February 2021, Public Health England have published the addendum (Addendum: Hot food takeaways use in the new Use Class Order - GOV.UK (www.gov.uk)). The replacement of the A5 hot food takeaway use class with sui generis allows local authorities to have greater control, through using the planning application process, to prevent the proliferation of hot food takeaways, and is testament to the will and alignment of central Government to create healthier places.

Whilst we appreciate that the Local Plan 2036 statutory guidelines are not yet implemented, please note that as stated in the [Havant Healthy Borough Assessment](#):

“4.34 It is acknowledged that unhealthy food sources can be found in convenience shops (Land Use Class A1), as well as cafes and restaurants (Land Use Class A3). Nevertheless, given the health priorities of Hampshire County Council and Havant Borough Council (Chapter 3), **the health profile of Havant Borough (Chapter 3), and the findings above, it is considered that there is a justification for a policy in the HBLP 2036 which restricts fast food outlets in Havant Borough.”**

The Healthy Borough Assessment further states the rationale for restricting hot food takeaway establishments, much of which we have reiterated in our previous response.

We also refer to guidance as set out in Public Health England’s 2020 report, [Using the planning system to promote healthy weight environments: Guidance and supplementary planning document template for local authority public health and planning teams](#):

“Each application for new hot food takeaways are made on its own merits and the 400m zone must be considered in the context of the individual application. There are mitigating factors that can be considered, for example the potential for natural or manmade barriers that limit accessibility from schools. There have been examples where applications have been submitted just outside of the 400m zone, resulting in difficulty in applying the exclusion policy despite public health concerns. **It may be appropriate to restrict hot food takeaway premises just beyond the 400m zone, subject to the local circumstances, such as:**

- **childhood obesity levels**
- **main school routes used by majority of children**
- **density of existing food retail uses”**

In subsequent paragraphs we reiterate the prevalence of childhood obesity in Havant, particularly in the ward in which the proposed development would be sited, and the high density of existing food retail uses. We reiterate that this is a likely route taken by children and parents on the school commute as there are multiple schools located within half a mile of the proposed development and residential dwellings. There is also a football club, skate park and community hubs, all of which provide opportunities for healthy living in Havant.

The developer cites recent examples where planning permission for McDonald’s drive-thru facilities were granted, however there are also plenty of recent UK-wide examples of proposed premises being rejected by Councils for similar reasons to those stated in this and previous responses. For example, Cheriton High Street in Folkestone, Musselburgh in East Lothian, Ottery St. Mary in East Devon, Palmers Green in Enfield, and Hawkeswood Road in Southampton.

The developer mentions ‘Havant’s current rate of hot food takeaways (89.6 per 100,000) sits below the national average (96.1 per 100,000)’. Whilst it may be lower than the national average, we have outlined clearly that Havant has a higher number of hot food takeaways than the Hampshire region, and that this is exacerbated in areas of higher deprivation. We reiterate this evidence from our previous response in the next few paragraphs.

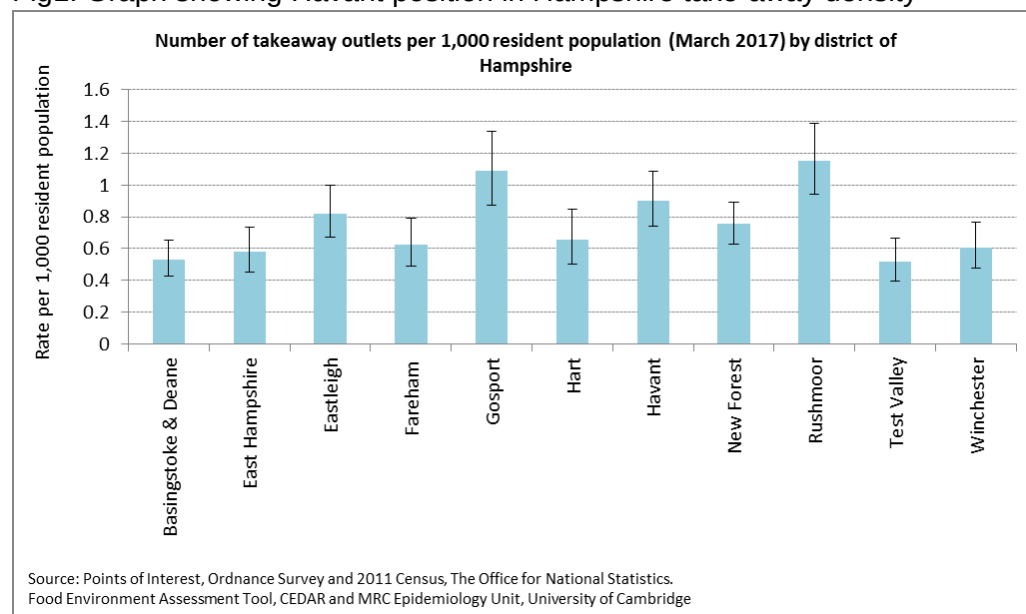
Take-away prevalence in Havant

To understand the potential impact of in takeaways in Hampshire, we have analysed Points of Interest (PoI) data from Ordnance Survey to look at how they are distributed by area, by deprivation and over time. Our data suggest that we have seen a growth in takeaways over the last four years, and the highest growth has been seen in our areas of greatest deprivation.

According to the PoI method there are 110 take-away style businesses in Havant. In Hampshire, the number of takeaway outlets per 1,000 resident population in the most deprived decile is more than two times greater than in the least deprived (average of 1.17 and 0.56 per 1,000 resident population, respectively). When analysed by district, Havant has the third highest concentrations of takeaway outlets in Hampshire, with an average of 0.91 per 1,000 resident population. In comparison,

these are almost double those for Test Valley and Basingstoke and Deane, which have the lowest concentrations in Hampshire. See Figure 1.

Fig1: Graph showing Havant position in Hampshire take-away density



Even in referring to Public Health England's fast food density tables published in June 2018⁶, which use different criteria (Food Standards Agency (FSA) Food Hygiene Rating Scheme (FHRS) data), there are 111 (a rate of 89.6 per 100,000 population) reported take away establishments in Havant. The evidence suggests that Havant has a high density of take-away establishments, compared to the rest of Hampshire. The application for a Costa and McDonalds drive-thru would further increase the density and availability of out-of-home food.

Furthermore, the respondent has neglected to reassure us regarding the unequal health impacts of fast-food takeaways. We reiterate that fast food takeaways such as McDonald's are usually situated in areas of higher deprivation, leading to a vicious cycle whereby those with lower incomes have manipulated choice architecture in their immediate food environment. Indeed, there has been an association made between areas of high deprivation and proximity to McDonald's outlets in England and Scotland (Mackins, Macintyre & McKay, 2005).

The proposed site straddles the Havant wards of Battins and Bondfields. In Bondfields 34.9% of children live in poverty (this is high for Havant, the SE region, and nationally). 33.4% of Reception-aged children in the Bondfields ward are thought to have excess weight, and 36.7% of Year 6 children. These figures are even higher in Battins (Public Health England, Local Health Fingertips data via [Local Health - PHE](#)).

It may be indeed the case that consumers are striving to become healthier. Many years of public health campaigns, such as 5-a-day, have resulted in consumers being more aware of nutrition and health. Along with our partners, we help residents to achieve this through the work carried out within our most recent edition of the Hampshire-wide Healthy Weights Strategy (2021...) as well as devolved strategies

within districts themselves, i.e. in Havant Borough Council Healthy Borough Assessment (2018). However, McDonald's restaurants are not necessarily where consumers go to achieve health, considering McDonald's has an international reputation as a fast-food franchise. We appreciate the will from McDonald's to improve the menu offering to provide healthier options, however, some evidence suggests that when consumers are faced with a food environment where they can access calorie dense, saltier and sweeter foods, compared to carrot slices or salads the former is preferred – i.e. foods high in sugar, salt and fat are seen as more palatable and enjoyable (Fazzino, Rohde & Sullivan, 2019). Whilst we note that McDonald's do not publicly release sales information, it could be hypothesised, based on the findings of Fazzino et al and other similar studies, that those items high in fat, salt and sugar represent a greater proportion of the sales and revenue than the healthier alternatives.

We advocate for citizens to have a healthy relationship with food, hence are not opposed to the mission of McDonald's to be an enjoyable outlet in which to dine. The problem arises where there is market oversaturation and a consumer's food environment is manipulated with less healthy options, such as fast-food and coffee and cake shops, like the proposed development occupying the adjacent site. We reiterate that there are existing McDonald's outlets within short walking, cycling, or transport distance. Furthermore, the developer suggests that the menu has become healthier over the years through reformulation and introduction of lower calorie options. Academic research suggests that these improvements have been marginal (Soo et al, 2018; Hearst et al, 2013).

We also maintain that despite McDonald's commendable work with local football organisations, drive-thru establishments by nature do not encourage physical activity and hence this does not align with the sporting rhetoric. Drive-thrus by nature require that one uses a personal car to order food, and quite often eat it inside the car. Customers are not able to access drive-thrus on foot. Furthermore, we would like to add that there is a potential for the drive thru to encourage anti-social behaviour, litter and noise in the area – the main use for which is proposed to be a housing site – this could affect the new and existing residents' wellbeing.

Thank you for your additional comments in the Appendix. We would like to reiterate, that despite staff carrying out litter picks around the area, there is still high prevalence of McDonald's litter as identified in Keep Britain Tidy surveys as referenced in our previous statement. Furthermore, the instalment of a drive-thru simply moves the litter problem away to where the customer chooses to eat the takeaway – this might not be at home hence we cannot assume that the litter will be disposed of in the correct way. To the other comments, we reiterate our previous statements.

We attach our previous response as an appendix upon which this consultation response has built.

Appendix

Previous response dated 7th January 2021

Public Health response to Havant Borough Council: Mixed-use development comprising 191 apartments and two drive-through restaurants, together with associated access, parking and landscaping (Ref: APP/20/00658)

The specific document to which we refer feedback is that which is titled “PLANNING, DESIGN AND ACCESS STATEMENT, INCORPORATING AFFORDABLE HOUSING STATEMENT, EMPLOYMENT AND SKILLS PLAN, SUSTAINABILITY STATEMENT AND UTILITIES ASSESSMENT”.

The application site and surrounds (pp.3)

We welcome the developer’s proposal to create C3 housing, a suitable use of a Brownfield site in response to a growing need for adequate, safe housing in Havant and surrounding areas, as a result of population increase. We hope that these apartments will be accessible and affordable to couples and single individuals, or at least that there will be a mix of affordable and more aspirational dwelling, in line with NPPF standards. From the mock-up provided, we anticipate that these dwellings will be tenure blind, making the affordable units equally attractive from the exterior. We welcome the developer’s recognition of the principles as set out in the Havant Borough Core Strategy, stating “*The Council aims to achieve an average of 30-40% affordable housing on sites of 15+ dwellings, with a tenure split of 65-70% rented and 30-35% intermediate*” to which we encourage the developer to adhere.

We welcome the use of a well-connected Brownfield site which facilitates active and sustainable travel for residents, due to its proximity to bus stops, local amenities and its integration of existing cycling and walking paths, as well as making the site attractive to prospective residents.

The proposed development (pp. 5-7)

Residential dwellings

We welcome the developer to create cycle storage and encourage motions to introduce adequate storage to serve the majority of dwellings, to promote active travel, and only using motorised vehicles where necessary. Equally, we welcome the development of resident parking to facilitate travel for less able users and for those who cannot access public or active transport means. We welcome the acknowledgement made by the developer that “*Cycle parking is required at a rate of one space per 1-bed and two spaces per 2-bed unit, plus an additional 20% for visitors.*” according to the Havant Borough Core Strategy, to which we anticipate the developer will adhere.

We welcome the proposal to surround the housing development with additional planting and lawn space as we know it is important for citizens to have access to greenery at home even in the absence of a garden, for mental and physical wellbeing. We also acknowledge that peripheral greenery will encourage biodiversity in the area.

McDonald's and Costa Coffee drive-thru

We have major reservations regarding the drive-thru proposed by the developer. We do not believe this aligns with Havant's bid to be a healthy nor a sustainable city, especially in light of Havant's particular health problems, with a stark prevalence of obesity compared to both neighbouring localities and the national average, as well as misalignment with Havant's 2019 declaration of a Climate Emergency. Most concerning, the food outlets proposed – McDonald's and Costa Coffee – clearly do not have health in their interests as multi-national corporate food industry outlets, nor do they feign to do so. Instead, they promote the consumption of ultra-processed, high fat sugar salt (HFSS) food and beverages with little regard for the damaging consequences of both their food and the way in which it is provided in a drive-thru environment. There is potential for users of either drive-thru facility to go to the second due to the convenient proximity, ergo doubling the access to and consumption of HFSS foodstuffs. This is a clear conduit for residents of the proposed housing developments to access cheap, convenience HFSS food and beverages which creates a poor food environment for these individuals, leading to poor health outcomes. The very features of a drive-thru remove opportunity for physical activity and necessitate sedentary behaviour (being seated as a driver or passenger). Physical activity and exercise are important for health and can help in the maintenance of healthy body weight.

Moreover, these drive-thru outlets will create pollution from the characteristic disposable packaging, which will affect the residents in the proposed dwellings. It was estimated by Keep Britain Tidy that half of all fast-food litter in the UK in 2020 was from McDonald's.

The residents will also be affected by the air pollution created by vehicles accessing the drive-thru. The installing of not only one, but two drive-thru facilities will create local traffic on an already busy road, creating further traffic and congestion, especially at peak times. These developments do not support a Green Transition which is necessary to respond to the Climate Emergency in Havant and surrounding localities. Any new trips might add to peak-time congestion idling. Regard should be given to the impact of vehicle emissions on air quality standards from localised traffic movements and queuing & idling vehicles.

The developer states that local residents will benefit from the installing of a McDonald's and Costa Coffee, providing '*new local facilities that are not currently available to the community*', continuing on to say the nearest McDonald's is 1.2 miles away on West Street, Havant. We would refute that it would be a commendable use of local transport links as praised and encouraged by the developer, for patrons to walk (26 minutes), cycle (seven minutes) or use the bus (11 minutes) to access this McDonald's should they wish to. The nearest Costa Coffee, the developers mention, is 3.9 miles away in Waterlooville, however we note that there are alternative chain coffee shops (Greggs and Gypsy King) in convenient proximity to the aforementioned West Street McDonalds, should patrons wish to access both.

Whilst we appreciate that the development of the two named food outlets would create around 90 jobs for the local community, we believe that this may come at the detriment of the health of said new employees, with any economic benefit to Havant outweighed by the potential public health harm of creating two new fast-food outlets. Healthy workplaces are a key priority for Hampshire County Council's planning agenda.

In light of the clear public health issues brought to the fore, we object to the development of these drive-thru outlets.

Response Regarding Obesity, Health and Well-being

Evidence on Obesity

In simplified terms, obesity can be a result of one regularly consuming more calories from food and drink than one burns through daily living. Nationally and locally, overweight and obesity is a serious public health concern, with prevalence in children and adults increasing. Our environment, especially the ready availability of food high in calories from supermarkets, takeaways, restaurants and cafes, is considered to be a significant contributory factor.

According to the **Public Health Outcomes Framework** 61.6% of adults in Hampshire are estimated to be overweight or obese¹.

Out-of-home food outlets such as restaurants, cafes and takeaways influence our dietary habits. Nationally, the proportion of meals eaten outside of the home is increasing, with more than one quarter (27.1%) of adults and one fifth of children now eating from out-of-home food outlets at least once a week².

Data published by Public Health England in 2017 show that fast-food outlets are more densely concentrated (i.e. greater number of outlets per 1,000 resident population) in areas of greater deprivation compared to more affluent areas. Meals eaten out of the home tend to be associated with larger portions, higher intakes of fat, sugar and salt and lower intakes of micronutrients than meals eaten at home².

Such concentrations of these establishment types may be contributing to the widening of health inequalities, as recognised in the Marmot Review³.

Greater access to takeaway outlets at home, work and on commuting routes has been associated with increased takeaway consumption⁴.

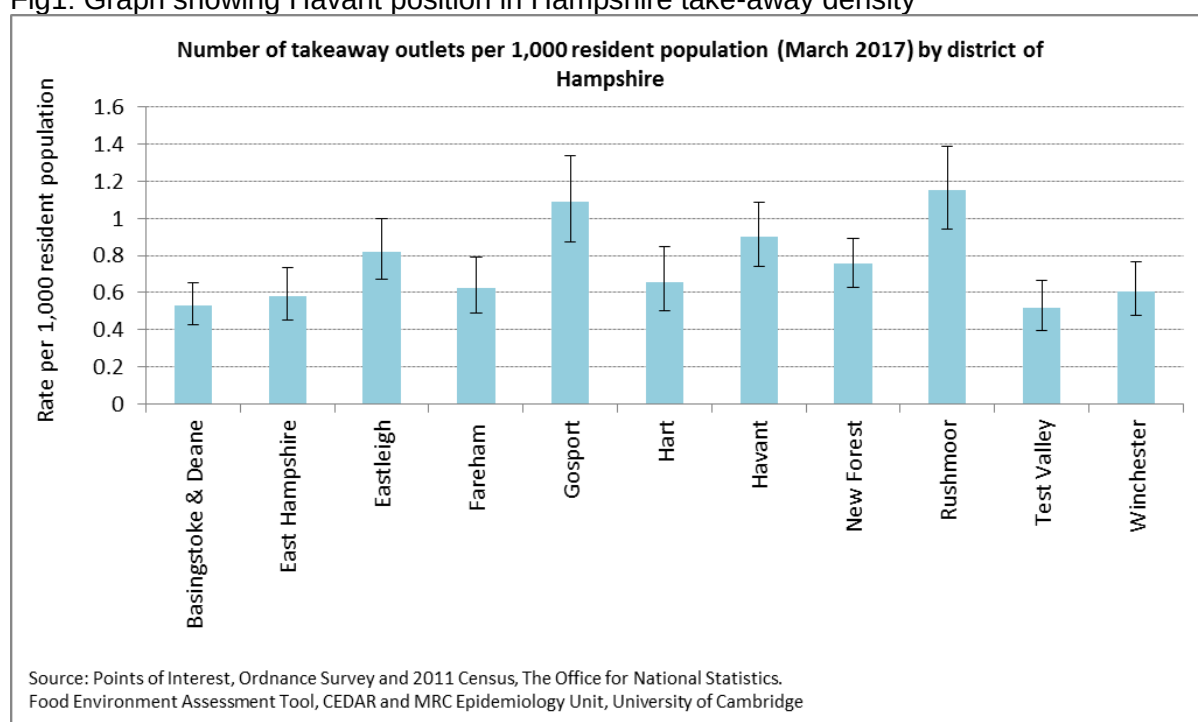
There is also a tendency for fast-food outlets to cluster around schools, increasing children's access to and opportunities for purchasing energy-dense, unhealthy food⁵. We observe that the proposed development is in close proximity to Sharps Copse Primary School, Trosnan Infant School and Riders Junior School amongst others. This creates an unhealthy food environment for children travelling to and from school, where parents may be pestered into buying fast food from these outlets.

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To understand the potential impact of in takeaways in Hampshire, we have analysed Points of Interest (PoI) data from Ordnance Survey to look at how they are distributed by area, by deprivation and over time. Our data suggest that we have seen a growth in takeaways over the last four years, and the highest growth has been seen in our areas of greatest deprivation.

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The evidence suggests that Havant has a high density of take-away establishments, compared to the rest of Hampshire. The application for a Costa and McDonalds drive-thru would further increase the density and availability of out-of-home food.

Figure 2 details the average (mean) calorie, saturated fat, sugar and salt content of typical McDonald's menu items for an adult meal. Analysis of the menus is based on

publicly available nutrition information¹. Figure 3 details the same², for Costa, looking at the nutritional information for a latte coffee beverage and a portion of cake.

The result of the menu analysis demonstrates that the food and drink offer at McDonald's and Costa can be considerably high in calories, saturated fat, sugar and salt, compared to the daily references intakes.

The main cause of obesity is the regular consumption of excess calories through food and drink. The proposed development provides further opportunity for the overconsumption of potentially unhealthy food and drink. For example, a large mocha with whole milk from Costa can provide as many as 321 calories and 27.4g of free sugar. It is recommended that most adults consume between 2000 and 2500 calories a day and no more than 30g of free sugars. Therefore, despite Costa being positioned in the wider out-of-home food and drinks market as a café/coffee shop, which may have healthier connotations than traditional "fast-food", the available food and drink products at Costa are not necessarily any healthier than alternative outlets. Figure 3 below demonstrates that it is feasible that an adult could consume almost half of their daily calorie intake in one sitting at Costa, if they chose to have a hot drink (e.g. mocha with whole milk, 321 calories) and a snack (e.g. carrot and walnut cake, 576 calories). If consumed regularly, these high calorie, high sugar foods and drinks could contribute to weight gain, obesity and associated health conditions (e.g. type 2 diabetes).

¹<https://www.mcdonalds.com/gb/en-gb/good-to-know/nutrition-calculator.html>

²<https://www.costa.co.uk/docs/store-allergen-guide.pdf>

Fig. 2 McDonald's (mean) nutritional content of typical adult meal (Bic Mac, medium fries, strawberry milkshake)



Fig. 3 Costa nutritional content of sample menu items

a. Sample Costa confectionery nutritional content

Product Description	Dietary Choices		Cereals Containing Gluten				Allergens																Nutrition per 100g/ml										Nutrition per portion						
	Suitable for Vegetarians	Suitable for Vegans	Wheat Products	Rye Products	Barley Products	Oat Products	Soye products	Egg products	Milk products	Fish Products	Crustacean Products	Mollusc Products	Sulphite Products	Sesame Products	Celery Products	Mustard Products	Peanut Products	Lupin Products	Tree Nut Products	Tree Nut Source (if present)	kJ	kcal	Fat (g)	Saturated (g)	Carbohydrate (g)	Sugar (g)	Protein (g)	Salt (g)	Portion weight (g/ml)	kJ	kcal	Fat (g)	Saturated (g)	Carbohydrate (g)	Sugar (g)	Protein (g)	Salt (g)		
FOOD																																							
CAKES																																							
BAKEWELL TART	YES	NO	YES	N	N	N	C	YES	YES	N	N	N	N	YES	N	N	N	N	N	N	YES	Around	1901	453	18.7	7.8	65.7	37.5	4.7	0.1	86	1635	389	16.0	6.7	57.0	32.0	4.0	0.1
BANANA AND PECAN LOAF CAKE	YES	NO	YES	C	C	C	C	YES	YES	N	N	N	N	C	N	N	N	N	N	N	YES	Peanut	1699	407	23.0	4.9	44.0	22.0	5.2	0.5	80	1360	325	18.0	3.9	35.0	18.0	4.2	0.4
BLUEBERRY MUFFIN	YES	NO	YES	N	C	YES	C	YES	C	N	N	N	N	N	N	N	N	N	N	N	C		1552	370	17.4	1.5	48.1	24.3	4.4	0.5	110	1707	407	19.0	1.6	53.0	27.0	4.8	0.6
CARROT & WALNUT CAKE	YES	NO	YES	N	N	N	C	YES	YES	N	N	N	N	N	N	N	N	N	N	N	YES	Walnut	1631	389	17.3	3.4	52.9	30.6	4.3	0.5	148	2414	576	26.0	5.0	78.0	45.0	6.3	0.7
CHOCOLATE TIFIN	YES	NO	YES	N	N	N	YES	N	YES	N	N	N	N	N	N	N	N	N	N	N	C		2099	502	27.8	14.4	56.5	29.6	5.5	0.8	80	1679	402	22.0	12.0	45.0	24.0	4.4	0.7
CINNAMON BROCHIE BUN	YES	NO	YES	N	C	C	C	YES	YES	N	N	N	N	N	N	N	N	N	N	N	C		1345	319	8.5	3.5	52.5	13.6	7.0	0.6	104	1399	332	8.8	3.6	55.0	14.1	7.3	0.6
LEMON CURD TART	YES	NO	YES	N	N	N	YES	YES	YES	N	N	N	N	YES	N	N	N	N	N	N	C		1996	478	26.8	15.1	52.8	24.4	4.7	0.2	70	1397	335	18.8	10.6	37.0	17.1	3.3	0.1
LEMON DRIZZLE LOAF	YES	NO	YES	N	N	N	C	YES	YES	N	N	N	N	N	N	N	N	N	N	N	C		1613	385	16.6	1.5	53.9	26.1	4.4	0.6	95	1533	365	16.0	1.4	51.0	25.0	4.2	0.6
LEMON DRIZZLE CAKE SLICE	YES	NO	YES	N	N	N	C	YES	YES	N	N	N	N	N	N	N	N	N	N	N	C		1613	385	16.6	1.5	53.9	26.1	4.4	0.6	91	1468	350	15.0	1.4	49.0	23.7	4.0	0.5
SILKMAN LEMON MUFFIN	YES	NO	YES	N	C	C	C	YES	YES	N	N	N	N	YES	N	N	N	N	N	N	C		1607	383	17.8	2.6	50.9	32.6	4.6	0.5	101	1623	387	18.0	2.6	51.4	32.9	4.6	0.5
MIUK CHOCOLATE CHUNK SHORTBREAD	YES	NO	YES	N	C	C	YES	C	YES	N	N	N	N	N	N	N	N	N	N	N	C		2178	521	29.8	18.9	55.9	25.8	6.4	0.2	70	1459	349	20.0	13.0	37.0	17.0	4.3	0.1
MILLIONAIRE'S SHORTBREAD	YES	NO	YES	N	C	C	YES	C	YES	N	N	N	N	N	N	N	N	N	N	N	C		2147	515	31.1	17.5	52.8	30.5	5.2	0.5	77	1653	396	24.0	13.0	41.0	23.0	4.0	0.4
RASPBERRY AND ALMOND BAKE	YES	NO	YES	N	N	N	N	YES	YES	N	N	N	N	N	N	N	N	N	N	N	YES	Around	2038	490	32.8	12.1	38.4	25.6	8.5	0.3	95	1936	465	31.0	11.0	36.0	24.0	8.1	0.3

b. Sample Costa drink nutritional content

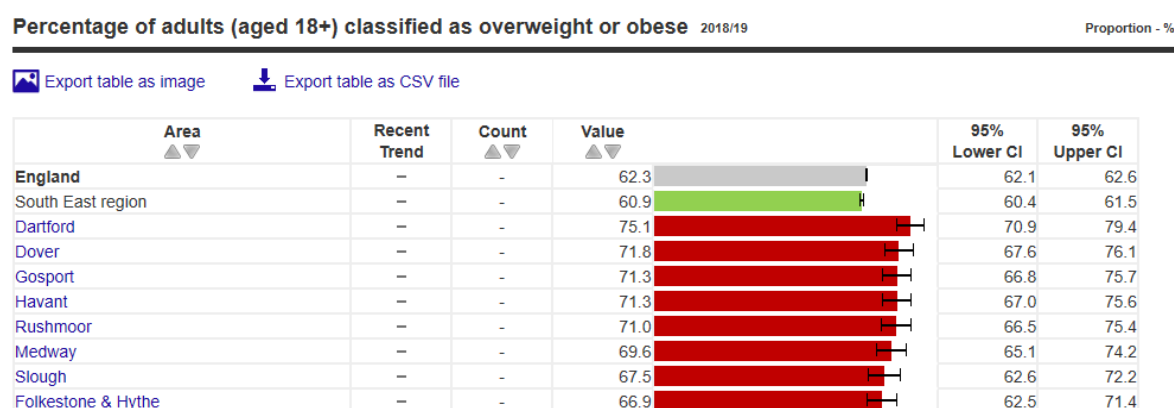
Product Description	Dietary Choices		Allergens																Nutrition per 100g/ml							Nutrition per portion													
	Suitable for Vegetarians	Suitable for Vegans	Cereals Containing Gluten					Soya products	Egg products	Milk products	Fish Products	Crustacean Products	Mollusc Products	Sulphite Products	Sesame Products	Celery Products	Mustard Products	Peanut Products	Lupin Products	Tree Nut Products	Tree Nut Source (if present)	kJ	kcal	Fat (g)	Saturated (g)	Carbohydrate (g)	Sugar (g)	Protein (g)	Salt (g)	Portion weight (g/ml)	kJ	kcal	Fat (g)	Saturated (g)	Carbohydrate (g)	Sugar (g)	Protein (g)	Salt (g)	
			Wheat Products	Rye Products	Barley Products	Oat Products																																	
MOCHA - MADE WITH WHOLE MILK - SMALL	YES	NO	N	N	N	N	N	N	YES	N	N	N	N	N	N	N	N	N	N	N	N		323	77	3.3	2.1	8.5	6.6	3.1	0.1	277	895	214	9.1	5.8	23.7	18.2	8.7	0.4
MOCHA - MADE WITH WHOLE MILK - MEDIUM	YES	NO	N	N	N	N	N	N	YES	N	N	N	N	N	N	N	N	N	N	N	N		337	81	3.2	2.1	9.4	6.9	3.2	0.1	332	1119	268	10.8	6.8	31.2	23.0	10.5	0.5
MOCHA - MADE WITH WHOLE MILK - LARGE	YES	NO	N	N	N	N	N	N	YES	N	N	N	N	N	N	N	N	N	N	N	N		318	76	3.1	1.9	8.8	6.5	3.0	0.1	422	1344	321	12.9	8.2	37.3	27.4	12.8	0.6
MOCHA - MADE WITH SOYA DRINK - MINI - TAKE AWAY	YES	NO	N	N	N	N	N	YES	N	C	N	N	N	N	N	N	N	N	N	N	N		285	68	2.0	0.6	8.5	6.2	3.3	0.1	172	490	116	3.5	1.0	14.7	10.6	5.6	0.2
MOCHA - MADE WITH SOYA DRINK - SMALL	YES	NO	N	N	N	N	N	YES	N	C	N	N	N	N	N	N	N	N	N	N	N		253	60	1.9	0.5	7.3	5.1	3.1	0.1	277	702	166	5.1	1.4	20.1	14.2	8.7	0.3
MOCHA - MADE WITH SOYA DRINK - MEDIUM	YES	NO	N	N	N	N	N	YES	N	C	N	N	N	N	N	N	N	N	N	N	N		271	64	1.9	0.6	8.2	5.6	3.2	0.1	332	899	213	6.2	1.8	27.1	18.5	10.5	0.4
MOCHA - MADE WITH SOYA DRINK - LARGE	YES	NO	N	N	N	N	N	YES	N	C	N	N	N	N	N	N	N	N	N	N	N		256	61	1.8	0.5	7.7	5.2	3.0	0.1	422	1080	256	7.5	2.2	32.4	21.9	12.8	0.5
MOCHA - MADE WITH COCONUT DRINK - MINI - TAKE AWAY	YES	NO	N	N	N	N	N	YES	N	C	N	N	N	N	N	N	N	N	N	N	C		257	61	1.6	0.9	9.0	6.8	1.9	0.1	172	441	105	2.8	1.5	15.4	11.6	3.3	0.2
MOCHA - MADE WITH COCONUT DRINK - SMALL	YES	NO	N	N	N	N	N	YES	N	C	N	N	N	N	N	N	N	N	N	N	C		226	54	1.5	0.8	7.7	5.7	1.8	0.1	277	626	149	4.1	2.2	21.3	15.8	5.1	0.3

It is established that take away and out of home eating, such as McDonald's and Costa drive-thru formats, have potential to contribute to increasing incidence of overweight and obesity in Havant, and increasing health inequity. On this basis it is further recommended that such a planning application is refused.

Overweight and obese adults in Havant

Data from PHE indicate that 71.3% of Havant adults in 2018/19 were overweight or obese⁷. This has increased from 58.2% in 2016/17. This maintains the Borough status as 'significantly worse' than the national average of 62.3%. Havant has the fourth highest percentage of overweight/obese adults in the South East region, as shown in Figure 4.

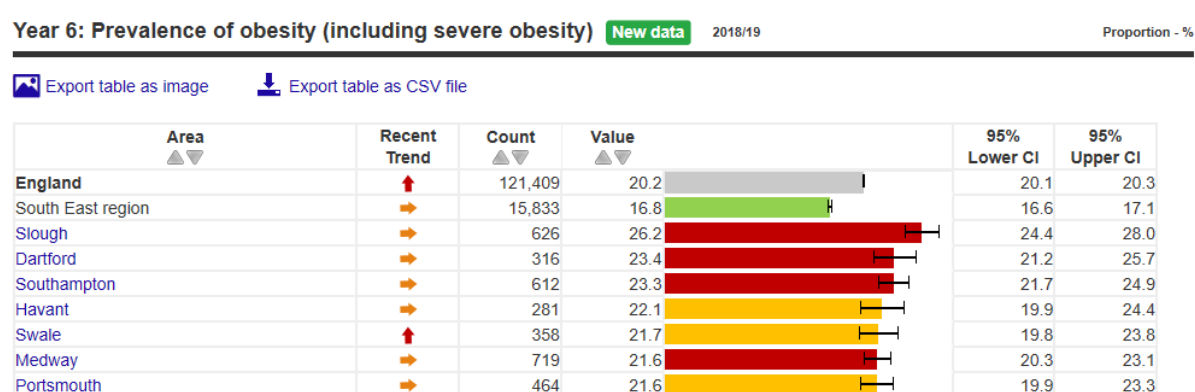
Fig 4. Havant position as fourth highest in South East for overweight and obese adults



Overweight and obese children in Havant

Data from PHE also indicates that childhood obesity in Havant is similarly to adults, fourth highest in the south east region, where, in the 2018/19 period, 22.1% of children in Year 6 were either obese or severely obese⁸. This is shown in Figure 5.

Fig 5. Havant position as fourth highest in South East for obese children in Year 6



Given that the proposed development loses opportunity for and discourages physical activity (by its nature, being a drive-thru facility) and evidence suggests it can contribute to the rising and already high levels of overweight and obesity in Havant, Public Health objects to this application.

Health and Well-Being Planning Practice Guidance (PPG)

Local authorities are obliged to take the new section of the Health and Well-Being Planning Practice Guidance (PPG) into account when deciding on planning applications.

As part of the PPG, authorities are encouraged to use their planning decisions to restrict the growth of new fast-food outlets, including: at locations where children and young people congregate such as schools, community centres and playgrounds, in areas with high levels of obesity, deprivation and general poor health, and in areas with over-concentration and clustering of outlets within a specified area. Town and Country Planning Association guidance⁹ echoes these principles in its recommendations for the planning and design of a new/existing development and further recommends that *“Development avoids overconcentration of hot-food takeaways (A5 uses)... and restricts their proximity to schools or other facilities for children”*.

On the basis of the PPG this application should be refused because the proposed development is sufficiently close to local schools (with three in proximity), close to community facilities (leisure/sports facility and open grounds), in an area already well served by take-away and drive-thru businesses and proposed to be located in Havant which has wards in the deciles of greater deprivation.

Through the **Hampshire Healthy Weight Strategy (2015-2019)**¹⁰ there are work-streams being pursued to work with caterers and food outlets. These include encouraging the reformulation of less healthy products whilst increasing the availability of healthier options, sharing evidence from behavioural insight techniques to make healthier choices easier consumer choices, and promoting healthy food environments, for example through the planning process, having established a **Public Health and Planning Position Statement**¹¹. The Statement seeks to support Planning Authorities in making informed decisions about shaping their local food environment. It is within this context that these recommendations are made.

Summary recommendation

It is the opinion of Hampshire County Council Public Health that this planning application should be refused. The use proposed conflict with National Planning Practice Guidance on health and well-being and are contrary to the intentions of Planning Policy C8 of the Havant Local Plan 2037, which proposes to limit density of hot food takeaways in the Borough. As such the proposal would undermine these aims, including detracting from opportunities to pursue physical activity, in an area already well served by similar food outlets. The proposals therefore have great potential to negatively impact on the health and well-being of residents in an area of Havant already affected by levels of overweight and obesity which are higher or significantly higher than average rates in Hampshire, the South East and England.

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