

Modification Ref	Section	Page in draft	Policy/Para/Table/Figure	Tracked Change/Change
HFT_M1	2 Background	9	Paragraph 2.31 Hot Food Takeaways in Kirklees	Delete and insert text: The Current Living in Kirklees (CLIK) survey undertaken in 2016 <u>2021</u> found that 19% <u>24%</u> of adults have fast food or a takeaway at least once a week. Those living in the most deprived areas (<u>10% most deprived</u>) are the most likely to eat takeaway food at least once a week (21% <u>30%</u>) and those living in the least deprived areas are <u>among</u> the least likely (14% <u>18%</u>).
HFT_M2	2 Background	10	Paragraph 2.34 Adult Obesity in Kirklees	Delete and insert text: Over half of all adults in Kirklees are overweight or obese. The proportion of adults who are obese has increased from 1 in 6 (17%) in 2005 to 1 in 5 (22% <u>21%</u>) in 2016 <u>2021</u> .
HFT_M3	2 Background	11	Figure 1 Links between deprivation and obesity	Insert revised Figure 1: REVISED FIGURE 1 TO BE INSERTED TO REFLECT UP TO DATE ADULT OBESITY DATA FROM 2021 CLIK SURVEY
HFT_M4	2 Background	11	2.4 Kirklees Council Food Strategies and Initiatives	Delete and insert text: <u>A whole systems approach to support healthy environments and reduce obesity</u> Kirklees Council Food Strategies and Initiatives
HFT_M5	2 Background	11	Paragraph 2.39	Delete and insert text: <u>Within Kirklees there</u> There are a number of food initiatives <u>and a broader set of system wide actions which support our healthy weight ambition and to</u> available within Kirklees to assist and raise awareness of healthy alternatives for fast food operatives.
HFT_M6	2 Background	12	Paragraph 2.45 Fusion Housing	Delete text: 2.45 Fusion Housing offer a number of workshops and courses, including 'Come Dine With Me' Healthy Eating Course, and a Healthy Eating and Cooking workshop, both courses cover topics including a balanced diet, how to eat healthily and the importance of having a good diet. 2.46 Further information about Fusion Housing and the courses that they have to offer can be found here: 2.47 www.fusionhousing.org.uk/Our-Services/learning-and-employment/
HFT_M7	2 Background	12	New Paragraph 2.45	Insert text: <u>Everybody Active: Kirklees Physical Activity and Sport Strategy 2015-2020</u> <u>Everybody Active is a Kirklees-wide partnership that makes it easier for people to be active and for activity to be an enjoyable part of everyday life. The Everybody Active vision is more people, more active, more often in Kirklees. Which seeks to create conditions to encourage and make it easier for people to be more active. By making changes across all sectors like workplace, schools, travel, regeneration, community development, it can make it much easier for us all to be active and for activity to be an enjoyable part of everyday life.</u>
HFT_M8	2 Background	12	New Paragraph 2.47	Insert text: <u>Kirklees Food Charter 2020</u> <u>This is designed to drive change in the Kirklees food culture. It has action plans to impact on health, the economy and environment by promoting better local food, skills training, local food businesses and healthy eating. A culture that promotes safe, affordable, accessible, sustainable local food and that supports the environment.</u>
HFT_M9	3 What is a Hot Food Takeaway?	13	Table 4 Examples of Hot Food Takeaway Sui Generis Use	Delete and insert text: Fast Food <u>Some</u> Drive Throughs
HFT_M10	3 What is a Hot Food Takeaway?	13	Paragraph 3.3	Delete and insert text: <u>It is for the applicant to determine whether their business will trade as a hot food takeaway which sell hot food where the consumption of that food is mostly undertaken off the premises and apply for planning permission for the correct use. In deciding whether an application is for a hot food takeaway, consideration will be given to the proportion of space designated for hot food preparation. To help with this, key considerations of how the business will operate are set out in paragraph 3.5. Where clarification is required, applicants are advised to consult with Kirklees Council. Restaurants and cafes often have an ancillary takeaway element and hot food takeaways can have ancillary eat-in facilities.</u>
HFT_M11	HFT2 Town Centre Vitality and Viability	15	HFT2 Vacancy level considerations	Delete and insert text: In centres where vacancy levels are more than 10% (or 25% in local centres) the Council requires evidence that occupancy of the unit has been attempted with a main town centre use other than a hot food takeaway before it will be supported. Where evidence suggests there is no demand for an alternative use, hot food takeaways could be considered favourably even if this would increase the proportion of hot food takeaways to above the threshold set out in this guidance. <u>Hot food takeaways will be supported in centres that have reached the threshold in this guidance where it can be demonstrated that there is no demand for an alternative use and there is a vacancy level of 10% or more in principal, town, and district centres or a vacancy level of 25% or more in local centres and at least one alternative use in all other centres.</u>
HFT_M12	HFT2 Town Centre Vitality and Viability	15	HFT2 Shutters	Delete and insert text: Conditions will be attached to any planning approval to ensure <u>that</u> shutters are not used between the hours of 9am and 5.30pm <u>designed</u> to prevent any harmful effects on the visual amenity of the street scene.
HFT_M13	HFT2 Town Centre Vitality and Viability	16	Paragraph 4.14	Delete and insert text: Shutters closed during the day can have a negative impact on the street frontage. The dead frontages created can deter shoppers and even deter other uses from locating on the high street. To encourage shoppers and visitors and create active and vibrant streets it is therefore important to ensure that shutters are not closed during the day <u>designed appropriately</u> . <u>There are a number of different grille options available in modern shutters. Grilles that allow views through are preferred and can be open mesh or transparent. Solid grilles are to be avoided.</u>
HFT_M14	HFT3 Proximity to Schools	16	HFT3	Added definition of 'over the counter' as a footnote: <u>The selling of a product directly to the public in the premise</u>
HFT_M15	HFT3 Proximity to Schools	17	Paragraph 4.16	Insert footnote: <u>http://www.fhf.org.uk/meetings/2008-07-08_School_Fringe.pdf</u>
HFT_M16	HFT4 Noise Abatement and Extraction of Odours	18	Paragraph 4.22	Delete text: A common concern associated with hot food takeaways is the impact on the amenity of adjoining occupiers through the generation of noise and odour.....
HFT_M17	HFT4 Noise Abatement and Extraction of Odours	18	Paragraph 4.23	Delete text: Noise generated internally usually from the kitchen can also be a nuisance to occupiers of premises adjacent to the hot food takeaway, as can noise generated from normal customer activity such as vehicle movements, particularly motorcycle delivery vehicles and slamming car doors and general customer noise outside the premises.
HFT_M18	HFT4 Noise Abatement and Extraction of Odours	18	Paragraph 4.24	Delete text: The position and appearance of flues providing odour extraction for hot food takeaways can be detrimental to the street scene if they are prominently located, of poor quality and/or inadequately maintained.....
HFT_M19	HFT4 Noise Abatement and Extraction of Odours	19	Paragraph 4.27	Delete text: The takeaway operating hours are also relevant to noise issues that can arise from the operation of a hot food takeaway.
HFT_M20	HFT5 Waste Disposal	20	Paragraph 4.31	Insert text: All applications must be accompanied by a Waste Management Strategy so that waste disposal details can be properly assessed. The Waste Management Strategy should include details of the storage of trade waste including the <u>location</u> , number and size of bins, the size and storage facilities for which must be commensurate with the amount of waste produced,
HFT_M21	HFT5 Waste Disposal	20	Paragraph 4.33	Delete and insert text: Consideration should also be given to t he Kirklees Council Waste Management Design Guide for New Developments (Waste Collection, Recycling and Storage Facilities Guidance) <u>contains guidance on the storage and collection of commercial waste, including size, nuisance issues, security, access and fire risk. This guidance should be taken into account when preparing a Waste Management Strategy. to ensure that effective waste management provision is made.</u>
HFT_M22	HFT5 Waste Disposal	20	Paragraph 4.34	Insert Footnote: <u>Waste Management Design Guide for New Developments (kirklees.gov.uk)</u> Insert text: The council also encourages the Waste Management Strategy to consider recycling and other initiatives such as 'litter picks' in the vicinity of the takeaway. <u>There should be enough space within the bin storage area to include separate bins for dry mixed recyclables and glass.</u> Applicants are also encouraged to consider the use of sustainable food packaging, such as cardboard boxes and paper straws.
HFT_M23	HFT6 Takeaway Design and Community Safety	21	Relevant Local Plan Policy	Insert text: <u>LP24, LP25, LP35</u>
HFT_M24	Appendix 1	26	Supporting information and evidence for HFT1 Public Health Toolkit	Delete and insert text: Appendix 1: Supporting information and evidence for HFT1 Public Health Toolkit <u>The Obesogenic Environment</u> This is an evidence base focusing on the harms of excess weight and the relationship between hot food takeaways and levels of obesity. It provides the evidence to support the requirements shown in HFT1 <u>and HFT3</u> . This appendix covers the impacts of obesity and the current situation locally.
HFT_M25	Appendix 1	26	Explanation of points based Public Health Toolkit	Move this section to a new Appendix 4.
HFT_M26	Appendix 1	28	Explanation of points based Public Health Toolkit	Delete and insert text: 5 year olds with excess weight Next update: <u>July September</u> 2022 11 year olds with excess weight Next update: <u>July September</u> 2022
HFT_M27	Appendix 1	28	Wider Determinants of Health	See attached document for all amendments to this section of Appendix 1

HFT_M28	Appendix 1	32	Table 7 Number of fast food outlets per 1,000 population by ward	<p>Insert revised Table 7:</p> <p>REVISED TABLE 7 TO BE INSERTED TO REFLECT CHANGES IN MID-YEAR POPULATION ESTIMATES</p>
HFT_M29	Appendix 1	33	Adult Obesity in Kirklees	<p>Delete and insert text:</p> <p>Over half of all adults in Kirklees are overweight or obese. The proportion of adults who are obese has increased from 1 in 6 (17%) in 2005 to 1 in 5 (22% 21%) in 2016 2021. It is important to recognise that levels of adults who are overweight or obese can vary significantly between different wards in Kirklees. The areas with the highest percentage of overweight or obese adults are Heckmondwike, Golcar Dalton (65%) and Dewsbury West (62% 74%) whilst the lowest proportions of overweight or obese adults are in Dewsbury South (50%) and Batley West (51%) Holme Valley South (51%) and Liversedge and Gomersal (53%).</p>
HFT_M30	Appendix 1	33	Table 9 Adult obesity levels in Kirklees by ward	<p>Insert revised Table 9:</p> <p>REVISED TABLE 9 TO BE INSERTED TO REFLECT 2021 CLIK SURVEY</p>
HFT_M31	Appendix 2	37	National Town Centre context	<p>Delete and insert text:</p> <p>The Royal Society for Public Health's latest report published October 2018 on 'Health on the High Street Running on empty' has identified that the clustering of unhealthy outlets is leading to a lack of diversity on the High Street which is not healthy for local communities, economically or otherwise. It highlights that limits for different types of outlets through legislation would be particularly useful in particular where clustering of fast food outlets is a local concern.</p> <p><u><i>A lack of diversity on high streets where there is the clustering of unhealthy outlets including fast food outlets has been identified and it is not healthy for local communities or the economy.</i></u></p> <p>Add footnote: <i>Royal Society for Public Health, Health on the High Street Running on empty 2018 https://www.rsph.org.uk/static/uploaded/dbdbb8e5-4375-4143-a3bb7c6455f398de.pdf</i></p>
HFT_M32	Appendix 2	37	Local Evidence	<p>Delete and insert text:</p> <p>The Local Planning Authority assesses the health and vitality of defined centres within the Kirklees District on an annual/bi annual basis through the town centre audit programme. Principal, town and district centres are assessed annually and local centres are assessed every other year. The occupancy of ground floor units and gross ground floor floorspace within defined town centre boundaries are monitored including the number of hot food takeaways.</p> <p><u><i>The audit programme data provides a snapshot of the occupancy of centres at the time the survey was undertaken. Therefore, the number and occupancy of shop units including those in use as hot food takeaways will change over time effecting the mix and balance of the type of shops, services, and unit vacancy within centres. Therefore, the percentage of hot food takeaway units, vacant units and total number of shop units surveyed will also change overtime. The latest occupancy data is published in the council's authority monitoring report and is used as a starting point for the consideration of planning applications.</i></u></p> <p>The <u><i>data in Table 10 is from the</i></u> occupancy surveys of principal, town and district centres undertaken in 2019 and local centres undertaken in 2018 <u><i>prior to the Covid pandemic, as shown in the table below This data highlights the mix of main town centre uses within each of the defined centres at the time of the survey. As part of that mix the survey</i></u> has identified that the number of hot food takeaways within the principal centres primary shopping areas (PSA) is 2.6 %, town centres is 6.7% and in district centres it is 10.3% of all the units recorded in main town centre uses (as defined in the glossary of the Local Plan and National Planning Policy Framework) including those that are vacant. The number of hot food takeaway units cumulatively within the 61 defined local centres is 15%, however, this ranges from an individual centre having no hot food takeaways at all to the highest of 40%.</p> <p><u><i>The hot food takeaway thresholds set out in this guidance reflect the role and function that the centres undertake which are set out in Local Plan policy LP13 Town centre uses.</i></u></p> <p><u><i>Principal town centres and town centres provide for the shopping needs of residents across Kirklees and are the focus for financial services, offices, entertainment and leisure, arts, culture, tourism, further education, and health services.</i></u></p> <p><u><i>District Centres provide a range of shopping for everyday needs and are the local focus for basic financial services, food and drink, entertainment, leisure and tourist facilities and health services with Local centres providing for top-up shopping and food and drink.</i></u></p> <p><u><i>Some centres have existing high concentrations of Hot Food Takeaways for their role and function such as Heckmondwike Town Centre at 12.4%.</i></u></p>
HFT_M33	Appendix 3	42	Further evidence supporting a restrictive buffer around Kirklees schools	<p>See attached document for all amendments to this section of Appendix 3</p>
HFT_M34	Appendix 3	43	Evidence for using a 400m-walking-distance restrictive buffer relative to Kirklees schools	<p>Delete and insert text:</p> <p>One of the assumptions used to support the criteria is that 0.4km (or 400m) is a convenient distance people are willing to walk to either access facilities or services on foot or foot or walk to a bus stop to access a facility, this distance is used by many local authorities who have adopted similar policies. This distance is approximately equivalent to a 5-10 minute walk time, <u><i>resulting in a total 10 minute walk time</i></u> (five minutes in each direction)(47) . The 400m distance and the resultant 10 minute walking duration leaves sufficient time for pupils to leave school, purchase the hot food and subsequently return for the afternoon lessons.</p> <p>A 10 minute walk <u><i>one way (total 20 minutes' walk time there and back)</i></u> was considered as there is some evidence to show that it is this greater distance that can impact on the consumption of food from hot food takeaways by pupils(48) ,.....</p>
HFT_M35	New		New Appendix 4: Explanation of points based Public Health Toolkit	<p>New Appendix 4: Explanation of points based Public Health Toolkit</p>

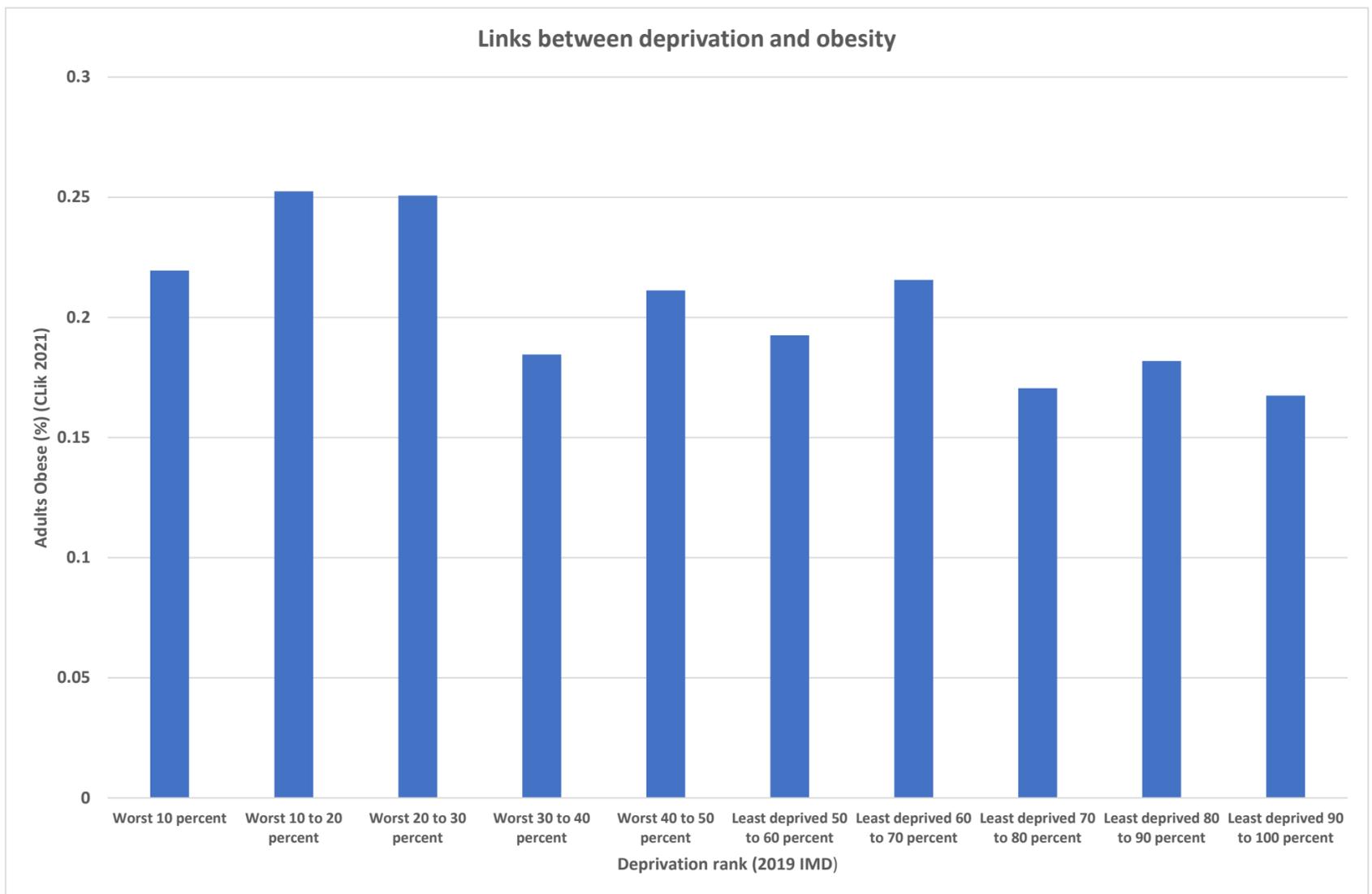


Figure 1 Links between deprivation and obesity (Current Living in Kirklees (CLik) Survey ~~2016~~ 2021 and IMD 2019)

Ward	Number of Fast Food Outlets	Fast Food Outlets per 1,000 population
Newsome (inc. Huddersfield Town centre)	75	3.14 <u>3.09</u>
Dalton	47	2.69 <u>2.72</u>
Greenhead	56	2.68 <u>2.64</u>
Cleckheaton	34	1.97 <u>1.96</u>
Heckmondwike	34	1.94 <u>1.96</u>
Dewsbury East	35	1.78 <u>1.74</u>
Batley East	28	1.43 <u>1.45</u>
Colne Valley	24	1.37 <u>1.35</u>
Dewsbury South	26	1.35
Crosland Moor and Netherton	25	1.29 <u>1.28</u>
Golcar	23	1.26
Birstall and Birkenshaw	20	1.19 <u>1.18</u>
Dewsbury West	24	1.08 <u>1.07</u>
Denby Dale	17	1.02 <u>1.01</u>
Mirfield	20	1
Liversedge and Gomersal	20	1
Batley West	20	0.98 <u>0.96</u>
Holme Valley North	16	0.94 <u>0.93</u>
Lindley	17	0.83 <u>0.82</u>
Ashbrow	16	0.78
Holme Valley South	13	0.68 <u>0.67</u>
Almondbury	12	0.66
Kirkburton	10	0.61

Table 7 Number of fast food outlets per 1,000 population by ward.

Source: Public Health England Fast Food Outlets at 31/12/2017 and ONS mid-2018 ~~2018~~ 2020 population estimates

Ward	Adults overweight or obese	Adults overweight	Adults obese
Almondbury	52% 58%	29% 30%	23%
Ashbrow	54% 59%	36% 35%	18% 21%
Batley East	54% 57%	34%	20% 19%
Batley West	51% 63%	31% 34%	20% 25%
Birstall and Birkenshaw	60% 64%	35% 38%	25% 19%
Cleckheaton	58% 64%	40% 38%	18% 26%
Colne Valley	55%	39% 38%	16% 15%
Crosland Moor and Netherton	52% 54%	32% 31%	20% 21%
Dalton	59% 65%	32%	27%
Denby Dale	56% 53%	30% 27%	26% 18%
Dewsbury East	57% 63%	31% 28%	26% 31%
Dewsbury South	50% 64%	28% 43%	22% 19%
Dewsbury West	62% 74%	32% 42%	30% 25%
Golcar	62% 57%	40% 32%	22% 20%
Greenhead	53% 60%	33% 32%	20% 26%
Heckmondwike	62% 61%	34% 29%	28% 24%
Holme Valley North	53% 54%	33% 36%	20% 14%
Holme Valley South	52% 51%	36% 34%	16% 15%
Kirkburton	59% 57%	43% 37%	16%
Lindley	59% 55%	40% 38%	19% 17%
Liversedge and Gomersal	56% 53%	29% 35%	27% 14%
Mirfield	61% 64%	38% 37%	23% 24%
Newsome	52% 56%	33% 27%	19% 27%
Kirklees Average	56% 59%	34%	22% 21%

Table 9 Adult obesity levels in Kirklees by ward

Source: Current Living in Kirklees Survey 2016 2021