APPENDIX 1

Cumulative Impact on Public Health
Scrutiny Review

A report produced by a Scrutiny Panel of
the former Policy & Performance Coordinating Committee

July 2016
# WIRRAL BOROUGH COUNCIL

## CUMULATIVE IMPACT ON PUBLIC HEALTH SCRUTINY REVIEW

### FINAL REPORT

## CONTENTS

| 1 | INTRODUCTION .................................................................................................................. 3 |
| 2 | CHAIR’S STATEMENT & REVIEW PANEL ........................................................................ 4 |
| 3 | EXECUTIVE SUMMARY & RECOMMENDATIONS ............................................................... 5 |
| 4 | METHODOLOGY ............................................................................................................. 7 |
| 5 | FINDINGS .................................................................................................................... 8 |
| 6 | APPENDICES ............................................................................................................... 19 |
1.0 INTRODUCTION

In June 2015 the Policy & Performance Coordinating Committee established a review panel to explore the issue of Cumulative Impact on Public Health. Cumulative impact refers to the principle that the increased presence of licenced premises and hot food takeaway’s is responsible for negative impacts on the health of people living in that locality.

The review was commissioned by Coordinating Committee because it was seen to cut across a range of Council Service areas. It commenced in September 2015 with the following objectives:

- To understand Wirral’s profile in terms of the prevalence and density of licenced premises and fast food outlets,
- To understand Wirral’s profile in terms of excessive alcohol consumption and poor diet,
- To establish what powers, policies and initiatives are at the Council’s disposal to mitigate against the harmful impact of high levels of alcohol consumption and poor diet,
- To determine if the Council is fully realising these powers as opportunities to improve public health outcomes.

A cross-party Panel of four Members was established and over a number of months convened a series of sessions with Council officers from related service areas and representatives from Merseyside Police. This report sets out the findings of the review and the recommendations arising.
2.0 CHAIR’S STATEMENT & REVIEW PANEL

_Councillor Moira McLaughlin (Chair)_

There is a clear understanding by policy makers that misuse of alcohol and poor diet are major factors which contribute to poor health and reducing life expectancy. It is also clear that people who live in the more deprived areas of our communities are more likely to be victims of these. Alcohol misuse can also lead to increased levels of anti-social behaviour and costs society a lot of money. This report carried out by a panel of the Coordinating committee did not set out to re-examine the detrimental effects of alcohol and diet, but to look at ways in which the local authority and other partner agencies can use existing policies to reduce them.

How can the consumption of the most damaging high strength alcohol be reduced? How can people be encouraged to eat more healthily and reduce the reliance on the much unhealthier fast food? Are the existing policies robust enough and, if not how can they be strengthened? How can they be implemented to maximum effect? These were the questions we asked and the findings have informed our recommendations. As a community, as a society, we welcome the fact that people are living longer, but we want lives to be both longer and healthier and the gaps in life expectancy to be reduced.

_Councillor Janette Williamson  Councillor Paul Hayes  Councillor Phil Gilchrist_
EXECUTIVE SUMMARY & RECOMMENDATIONS

Concern about levels of alcohol consumption and poor diet on public health are national issues that resonate strongly at the local level. The link between excessive drinking and poor diet with poor health outcomes is well documented. In reviewing the data for Wirral, it was clear to the review Panel the borough performs poorly against the national averages in relation to a number of key public health indicators linked to diet and alcohol consumption.

The ‘Wirral Resident’s Live Healthier Lives’ Pledge of the Wirral Plan sets out the Council’s commitment to improving local public health outcomes. The need for coordinated action to tackle these issues is clear. This work cuts across a range of different disciplines and Council teams including Licensing, Public Health, Trading Standards, Environmental Health and Planning. Joint working between these teams is improving but needs to be further integrated and coordinated in order to have the maximum impact.

In conducting this review, the Panel were impressed with a number of innovative schemes and initiatives that officers have collectively developed and implemented. However, the panel concluded that more could be done through formal mechanisms, specifically the Council’s planning and licensing policies. The Panel believes that a bolder and more ambitious approach should be articulated through the Council’s licencing and planning policies in line with steps that other authorities have already taken. This would contribute more explicitly towards improving public health outcomes in the borough. Based on the findings set out in section 5 of this report, the Panel has developed the following recommendations:

**Recommendation 1:** The Council’s Leadership is encouraged to lobby for a Public Health licencing objective in the Liverpool City Region and where possible at national level to ensure public health outcomes are given greater priority in licencing decisions.

**Recommendation 2:** The Council’s Statement of Licensing Policy is refreshed to accommodate the renewed priorities as set out in the Wirral Plan. It is also recommended that consideration be given to introducing a Cumulative Impact Policy in areas where there is strong evidence to suggest such a policy would address the negative impact of over-saturation of licenced or off-licenced premises.

**Recommendation 3:** The Panel recommends that a statutory Supplementary Planning Document is urgently developed and consulted upon (thus becoming a material consideration), in line with the approach taken in St Helens, as part of the preparation of the Council’s Core Strategy Local Plan.

**Recommendation 4:** The panel encourages the planning and public health teams to work closely together to address the borough’s public health issues in relation to poor diet and obesity, as outlined in the 2020 pledge to support Wirral Residents to Live Healthier Lives.

**Recommendation 5:** The panel acknowledges the wide ranging benefits of the voluntary participation of businesses in the Reduce the Strength campaign in promoting responsible selling of
alcohol. It is recommended that priority be given to encouraging the take up of this initiative so the number of outlets taking part is increased. The Council should also explore the possibility of approaching national supermarket chains to adopt this as a policy.

**Recommendation 6:** It is recommended the effective delivery and marketing of the ‘Eat Well Wirral’ and ‘Takeaway for a Change’ initiatives is prioritised and the schemes are properly evaluated to demonstrate their long term impact. The development of EWW takeaways and their locations should be a matter drawn to the attention of the planning committee at regular intervals.

**Recommendation 7:** The Panel supports the creation of a cross-departmental working group and action plan for selling alcohol responsibly. The Health and Wellbeing Board should oversee the activities of this group and ensure they are joined up with the Wirral Resident’s Live Healthier Lives pledge delivery group so that further partnership opportunities and targeted initiatives are explored.
4.0 METHODOLOGY

Written Evidence

The Review was informed by written evidence including reports from other local authorities and documents from Public Health England and the Local Government Association. To support the evidence gathering sessions officers prepared a number of briefing papers and presentations.

Evidence Gathering Sessions

In order to further understand the issues, the panel met with a number of key stakeholders including Council Officers from different services and Merseyside Police. The timetable of sessions is set out below:

Evidence Gathering Session 1
Licensing and Community Safety, Wednesday 14th October 2015

Evidence Gathering Session 2
Public Health, Thursday 26th November 2015

Evidence Gathering Session 3
Environmental Health & Trading Standards, Wednesday 13th January 2016

Evidence Gathering Session 4
Merseyside Police & Licensing, Thursday 11th February 2016

Evidence Gathering Session 5
Planning, Thursday 7th April 2016
5.0 FINDINGS

Wirral’s Health Profile

Alcohol

Life expectancy in Wirral is lower than the England average for males and females. A breakdown of the causes of the life expectancy gap between Wirral and England (2012) highlights a significant number of deaths from alcohol linked diseases such as cancer and digestive issues.

Wirral had significantly higher rates of alcohol related hospital admissions than the England average in 2013/14, as shown in the figure below.

Source: Local Alcohol Profile for England (LAPE) data, 2015.

LAPE data also shows that Wirral had a significantly higher rate of alcohol specific hospital admissions (741 per 100,000 persons) than the England average (374 per 100,000 persons) in 2013/14.

The rate of alcohol related mortality in Wirral (55.9 per 100,000 persons) was also significantly higher than the England average (45.3 per 100,000 persons) in 2013.

Data suggests a correlation between the density of off licenses across Wirral and rates of alcohol related hospital admissions in these areas (see Appendix 1 and 2). Officers believe there is a
strong case to link the density of availability of alcohol to alcohol related illness, particularly in the most deprived areas of Wirral.

The economic cost to Wirral of alcohol problems in terms of health, social cost, criminal justice, and lost productivity is estimated at £127million per year, of which £25million is healthcare costs.

Public Health has commissioned a Local Alcohol Inquiry. The aim of the project is to bring together a diverse and representative group of residents to deliberate and discuss, over a number of sessions, the question, “What can we all do to make it easier for people to have a healthier relationship with Alcohol?” The Inquiry will hear from a variety of expert witnesses from the field, providing them with a wide range of experience, knowledge and perspective.

The group’s findings and recommendations will help to inform a Local Wirral Alcohol Strategy and the group will become its ambassadors. From the Public Health perspective, there are three factors that have a significant impact on levels of alcohol consumption: Availability, Accessibility and Affordability.

Wirral’s Poor Diet Profile

The total number of obese people on Wirral is estimated at 66,803 with a further 97,184 estimated to be overweight. The annual cost to Wirral of healthcare for overweight and obese people was £109m (end of year 2015). The majority of this figure is spent on the treatment of type 2 diabetes.

Data from the National Child Measurement Programme showed that Wirral had more overweight Year 6 children than the national average. There is a clear link between deprivation and obesity for children and adults, particularly amongst adult women. Appendix 3 shows a geographic link between the density of available fast-food takeaways and overweight / obese children in the borough.

The Regulatory Environment in Wirral

Licensing Powers

The primary legislation governing Wirral Council’s licensing powers is the Licensing Act 2003 which came into force in 2005. This transferred responsibility for licensing from the Magistrates Court to the Local Authority. The other major change was the removal of the 11:00 pm limit on closing time, with applicants being able to apply for any closing time subject to upholding licensing objectives.

The Licensing Act sets out four licensing objectives:

- The prevention of crime and disorder
• The prevention of public nuisance
• Public safety
• Protection of children from harm

Under the legislation, the presumption is always to grant an application unless there is concern that the applicant is unable to satisfy all of the objectives. Any representations to challenge applications have to be made against one or more of the objectives. The process requires a 28 day notice period, where all Responsible Authorities are made aware of the application. Responsible Authorities include:

• The Licensing Authority
• The Police
• Trading Standards
• Environmental Health
• Planning
• Public Health

Public Health is not one of the four licensing objectives under current legislation. However, the issue of a public health licensing objective is gathering momentum nationally. A Local Government Association report, ‘Rewiring Licensing’ (2014) proposes that: “Licensing decisions should be reached locally based on a broader set of licensing objectives that includes the protection of public health.” Directors of Public Health England are also lobbying for the adoption of a fifth licensing objective on public health, as is the case in Scotland - ‘Protecting and Improving Public Health’.

As a Responsible Authority, Public Health makes regular representations to challenge licensing applications, but these tend to be on an area basis rather than in relation to the specific premises. As there is no public health objective within the licensing framework, representations based on national public health data do not tend to have sufficient relevance to the licensing objectives.

**Recommendation 1:** The Council’s Leadership is encouraged to lobby for a Public Health licensing objective in the Liverpool City Region and where possible at national level to ensure public health outcomes are given greater priority in licensing decisions.

Cumulative Impact Policies were introduced as a tool for licensing authorities to limit the growth of licensed premises in problem areas. Cumulative Impact is not referred to in licensing legislation although the statutory guidance issued under section 182 of the Licensing Act 2003 does refer to Cumulative Impact Policies (CIP) and provides advice regarding their implementation.
If a licensing authority wishes to introduce a CIP it must set out the detail of its CIP in its Licensing Policy Statement. Before implementing a CIP, a licensing authority will usually conduct a consultation exercise and consider the effect that additional premises will have on the cumulative impact in a defined area.

Merseyside Police made an application for a CIP to cover an area around Charing Cross in Birkenhead in 2014. The Police area command team had highlighted and collected evidence of an increasing problem with street drinkers and associated anti-social behaviour in the area. It was hoped that the introduction of a CIP in this area would assist in restricting access to strong alcohol and therefore help to reduce the impact on local residents and businesses.

As part of the CIP application process, the Licensing Act required the licensing authority to undertake a consultation exercise which included businesses within the area of the proposed policy. A 6 week consultation took place and the team were disappointed that no comments were received from either businesses or local residents. It was considered that although the application was supported by local Councillors, the lack of response to the consultation weakened the overall case for the CIP.

During the consultation period Merseyside Police undertook a review of their evidence and gave consideration to new initiatives within the Birkenhead area to address anti-social behaviour. Merseyside Police also had regard to the Council’s revised Statement of Licensing Policy. Taking these factors into consideration at that time, Merseyside Police subsequently advised that they were no longer seeking the introduction of a Cumulative Impact Policy within the Birkenhead area.

At the time of withdrawal, it remained the aim of the Police to re-consider applying for a CIP in future should there be sufficient local support and evidence to do so. In the meantime, the Police would continue to challenge license applications on an individual basis, should there be concerns that businesses would contribute to public disorder.

It is difficult to gather robust evidence to link crime and disorder to particular off license premises. It was noted that it is easier to attribute (and gather evidence of) occurrences of crime and ASB to licenced premises such as pubs than it is for off licenses.

Other local authorities have implemented CIPs and the Panel were informed that Liverpool City Council has introduced CIPs in five areas. Only one of these (Kensington) relates to off sales. In order to support the CIP application in Kensington, the local authority commissioned an independent body at a cost of £20k to gather evidence of anti-social behaviour linked to specific premises.

Data provided on a CIP introduced in Lark Lane, Liverpool suggests that CIPs appear to be more effective when applied to areas with a proliferation of on-licences, where it is easier to make the link between specific premises and disorder. This is more difficult with off-licences and other initiatives to encourage responsible alcohol sales may be a more effective approach.
Merseyside Police informed the Panel that they were not opposed to CIPs in principle and believe that CIPs may have some impact alongside other initiatives. However, CIPs should not be viewed as the singular answer to problems around over-saturation of licenced premises. The introduction of a CIP in a particular area will not guarantee that no licenses will be granted in that area, but the presence of a CIP could lead to improvements in the quality of licensees and applicants.

The Public Health view is that Cumulative Impact Policies could be beneficial if they were applied to specific areas of high deprivation and high density of alcohol availability.

**Recommendation 2:** The Council’s Statement of Licensing Policy is refreshed to accommodate the renewed priorities as set out in the Wirral Plan. It is also recommended that consideration be given to introducing a Cumulative Impact Policy in areas where there is strong evidence to suggest such a policy would address the negative impact of over-saturation of licenced or off-licenced premises.

**Planning Powers**

As a Local Planning Authority, Wirral Council’s Planning department responsibilities include determining planning applications and producing a Local Plan. Local plans must be positively prepared, justified, effective and based on up to date relevant evidence about the economic, social, environmental characteristics and prospects for the area consistent with national policy in accordance with the Planning and Compulsory Purchase Act 2004. A Local Plan cannot be formally adopted as part of the statutory development plan unless it is found to be legally compliant and sound following independent examination.

The Council is currently preparing a Core Strategy Local Plan which will be reported to members submitted for public examination during 2017.

Current legislation requires planning applications to be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise. Supplementary Planning Documents can additionally be used to provide detailed advice on policies in the development plan and help applicants make successful applications, but must not conflict with the development plan nor add unnecessary financial burdens on development.

Material considerations include the National Planning Policy Framework, which sets a presumption in favour of sustainable development, a Council’s Local Plan and Supplementary Planning Documents. Other material considerations can also include past appeal decisions, case law, loss of privacy, noise and disturbance etc.
**Current Development Plan for Wirral**

The statutory Development Plan for Wirral currently consists of the Unitary Development Plan (UDP). The overall strategy of the UDP is urban regeneration to encourage investment and development particularly in areas suffering the worst conditions by making effective use of land and ensuring neglected land or buildings are brought into use.

Hot food takeaways are currently permitted in all the Borough’s existing centres and shopping parades, subject to the criteria in UDP Policies SH1, SH2, SH6, SH4 and Supplementary Planning Document (SPD) 3 ‘Hot Food Takeaways, Restaurants, Cafes and Drinking Establishments’.

The Council’s Supplementary Planning Document SPD3 for hot food takeaways, restaurants, cafés and drinking establishments specifies that:

“All proposed uses within Use Classes A3, A4 and A5 i.e. restaurants, cafes, drinking establishments and hot food takeaways should be at least 40 metres away from the main elevation of a dwelling house or a building used solely for self-contained flats, when measured along the public highway.”

The Review Panel referred to examples of supplementary planning guidance from other local authorities which specifically relate to the location of hot food takeaways near schools. Stoke City Council’s draft SPD (which following objections in 2013 has not yet been formally adopted), proposed to place a 400 metre exclusion zone around the boundary of secondary schools for hot food takeaways (Use Class A5). Wirral’s planning officers explained there are no reported planning appeals where proximity to schools has been cited as the sole reason for refusal, referring to briefings from the Local Government Information Unit highlighting the importance of providing local evidence specific to proposals being considered. It is suggested a lack of evidence on effectiveness weakens the argument for preparation of such policies in Wirral. Research into planning decisions regarding hot food takeaways, shows that there is normally a combination of reasons why a planning application for a hot food takeaway is refused. Because of the multiple factors that are taken into account when assessing a planning application and appeal, it is not possible to give a precise number of hot food takeaways that have been rejected due to public health influenced policies developed by local authorities across the country.

Planning officers highlighted the need for caution in that reasonable grounds to refuse planning applications must be clearly demonstrated and supported by expert witnesses. There must be confidence in the evidence base to support such decisions as refused planning applications can be subject to appeal and claims for costs, which would be decided by the Planning Inspectorate.

In order to develop a successful health argument in relation to planning, substantive evidence which clearly shows a negative impact on health in specific cases would be required. Officers noted the importance of working alongside Public Health colleagues to produce such detailed evidence and to defend refusal reasons on health grounds if needed at appeal. There are issues
regarding the availability of data and evidence linking individual fast food outlets to harm caused. There is a need for more specific and detailed data to oppose the granting of planning consent that would withstand appeal and legal challenge.

An example of the level of detail required in evidence, would be if a street contained five fast food outlets in close proximity and an application was received for a sixth to occupy a vacant shop, an assessment would be required to measure the difference in health and other impacts between having five outlets in the vicinity and having a sixth.

The Planning Team shares the Panel’s concern regarding the proliferation of fast food outlets and the public health impact in certain parts of Wirral, emphasising the need for robust policies, based on sound evidence, to tackle these issues. The Planning Team are working with Public Health with regard to incorporating public health considerations into the emerging Core Strategy Local Plan.

**Public Health and Planning Policy**

The Department of Health’s public health strategy “Healthy Lives, Healthy People: A call to action on obesity in England” (October 2011) explicitly recognises that “health considerations are an important part of planning policy” and refers to maximising the contribution of the planning system to promote and support healthy living. It refers to a number of local authorities taking steps to use existing planning powers to limit the growth of hot-food takeaways.

In this context and responding to concerns from Planning colleagues, the Panel was keen to explore whether other local authorities were taking a bolder approach to their use of planning powers as a tool to improve public health outcomes. In particular, the emergence of supplementary planning guidance to aid planning decisions over the location and clustering of hot food takeaways became a key area of focus.

The Public Health team highlighted Stoke on Trent City Council’s Hot Food Takeaway draft Supplementary Planning Document (SPD) which seeks to introduce principles to be considered when considering new hot food outlet applications. Principle 1 of the SPD proposes to introduce Secondary School Exclusion Zones and states that planning permission will not be granted for new hot food takeaway premises within School Exclusion Zones, i.e. within 400m of all secondary schools. The document also contains a section on Healthy Eating Options. In response to concerns in Stoke over obesity levels, (reported as 31.2% of adults compared to the national average of 24%) the Council aims to promote interventions and policies which improve health outcomes, particularly for children and young people.

It is the view of Public Health that Supplementary Planning Guidance (such as Stoke City Council), could be used to prevent fast food takeaways opening in areas such as near schools or areas of high deprivation. Guidance could also be used to encourage local businesses to provide healthier alternatives and engage with local campaigns / initiatives.
Further research around supplementary planning guidance revealed the existence of a St Helens Council SPD for hot food takeaways, adopted in 2011. St Helen’s Council has implemented a wide-ranging policy including a number of restrictions, granting planning approval only “within identified centres, or beyond a 400m exclusion zone around any primary or secondary school and sixth form college either within or outside local education authority control”. The council’s SPD is a material consideration in determining planning applications. As well as proximity to schools and health impact, it covers issues such as over-concentration and clustering, highway safety, cooking smells, and litter, which are also included in Wirral’s own existing planning policies.

The Panel were encouraged by evidence which demonstrated that the St Helens policy is robust and effective. An appeal against a decision to refuse a hot food takeaway application referenced the SPD as a material consideration when the appeal was dismissed in 2012. Whilst it is acknowledged that the decision was not solely based on public health grounds, the Planning Inspector’s decision notice stated:

“The objective of the SPD, to establish healthy eating habits and reduce childhood obesity, is important, and whilst not determinative in this case, the failure to comply with it adds weight to my decision.”

Recommendation 3: The Panel recommends that a statutory Supplementary Planning Document is urgently developed and consulted upon (thus becoming a material consideration), in line with the approach taken in St Helens, as part of the preparation of the Council’s Core Strategy Local Plan.

Research into the Stoke City Council Supplementary Planning Document and discussions between colleagues from Wirral Public Health and their Stoke counterparts highlighted a recent decision at Stoke to locate a Public Health funded officer within the Planning Policy team:

“Since November 2014, Public Health has funded a specific city council Healthy Urban Planning Officer who works within the Planning Policy team. He has reviewed the SPD document and carried out further research on the weight being given to health considerations by inspectors at planning appeals at a national level, in order to ensure the SPD is robust and defendable and can respond to objections being made by national fast food chains.” City of Stoke on Trent Planning Committee Policy Group, Report – Hot Food Takeaway Supplementary Planning Document, 30 September 2015.

Feedback from Stoke Public Health (via Wirral Council Public Health Officers) suggests that this arrangement has proved beneficial in strengthening links between Planning and Public Health.
**Recommendation 4:** The panel encourages the planning and public health teams to work closely together to address the borough’s public health issues in relation to poor diet and obesity, as outlined in the 2020 pledge to support Wirral Residents to Live Healthier Lives.

Wirral’s innovative response to the issues of alcohol consumption and poor diet.

In response to issues around alcohol consumption and poor diet in Wirral, a number of campaigns and initiatives have been implemented by Wirral Council and partner agencies.

**Reduce the Strength (RtS) Campaign**

‘Reducing the Strength’ refers to initiatives designed to tackle the problems associated with street drinking by removing from sale low price high-strength alcohol products through voluntary agreements with local retailers.

Wirral Council Environmental Health and Trading Standards department implemented RtS in Wirral following discussions with the Admissions Consultant at Arrowe Park Hospital. There was concern over the number of emergency beds being taken by patients suffering from the effects of severe intoxication, alcoholism and alcohol related injuries or illnesses.

A pilot area was selected for the campaign and the ‘7 Beats’ area in the Birkenhead & Tranmere ward was chosen due to the density of alcohol availability (6.7 licensed premises per 1000 head of population) and the high level of alcohol related ASB incidents and crimes in the area.

RtS is a voluntary scheme which encourages local retailers in targeted areas to voluntarily cease sales of cheap super-strength alcohol, to limit the supply to problem drinkers. RtS focussed on two areas – the impact of super-strength alcohol on the local community and the impact of super-strength alcohol and associated issues on the businesses themselves.

The campaign has been successful with 23 retailers in the 7 Beats area now signed up to RtS and demonstrating a responsible approach to alcohol retailing. Other successes include increased public sector partnership working and the identification of criminality associated with off licenses, such as illegal alcohol and tobacco sales, tax evasion, utilities fraud and people trafficking.

The Public Health team view the RtS initiative as a good example of joined-up working with Council and agency partners. RtS has had a significant impact in reducing the availability of cheap super-strength alcohol in a targeted area.

Feedback from retailers signed up to the initiative is positive. The success of the campaign comes from the face to face approach taken by the team, their patience and their ability to talk to retailers. The campaign is being rolled out slowly targeting specific areas of concern. It would not be possible to replicate this approach across the entire borough at one time with current
resources. However, the campaign’s success has encouraged some retailers from outside the pilot areas to sign up to RtS.

Following the success of the RtS pilot, the team has applied for public health funding of £135k to enable the campaign to be continued in other areas of the borough where there are concerns about high levels of alcohol related crime, ASB and high densities of Off Licences.

**Recommendation 5:** The panel acknowledges the wide ranging benefits of the voluntary participation of businesses in the Reduce the Strength campaign in promoting responsible selling of alcohol. It is recommended that priority be given to encouraging the take up of this initiative so the number of outlets taking part is increased. The Council should also explore the possibility of approaching national supermarket chain to adopt this as a policy.

**Takeaway for A Change (TFAC) and Eat Well Wirral (EWW)**

Wirral has a higher than national average number of overweight children living in its most deprived socio-economic wards. These communities have a high density of takeaway premises. Data from the British medical Journal shows a direct link between exposure to takeaway food outlets and consumption of takeaway food. Trading Standards and Environmental Health officers introduced the TFAC and EWW projects as an innovative approach to tackling these issues in targeted areas of Wirral.

The aims of TFAC and EWW were to work with parents, children and fast food businesses to improve the healthiness of takeaway food, and to increase understanding and encourage a more positive attitude towards healthier diets. TFAC acknowledges the role of fast food businesses as a vehicle for positive change and seeks to work alongside local businesses rather than treating them as the enemy.

A pilot study of 214 families showed that most choose a takeaway outlet based on its proximity to home, supporting existing evidence that the ‘food environment’ has an impact on meal choices. Officers felt that making small, healthier changes to the food that children are already eating was the most realistic way of making significant impact.

The campaigns have faced significant barriers and challenges, such as local businesses’ reluctance to changing their practices, particularly changing frying oil, using less salt and MSG as these affect the taste of their food and this represented a risk to their business. Financial incentives were provided, e.g. paying for new cooking oil, in order to share the risk with businesses. Families were also initially wary and reluctant to engage, not wanting to admit or share their unhealthy eating habits. Officers spent weeks engaging with families to build trust, resulting in 214 out of 285 families signing up to the TFAC scheme at the first (pilot) school.
Using a joined up approach with EWW, businesses were guided to introduce and highlight healthier options menus and include healthier drinks and snacks in their offer. TFAC delivered workshops and awareness-raising sessions to families and issued vouchers to exchange for free healthy takeaway meals at EWW businesses.

The families’ responses to trying the healthier option were positive; with the majority of consumers saying they had ‘no reason’ not to continue choosing the healthier option. Short booster / catch-up sessions to keep in touch with families would maintain engagement and work towards sustained change. Schools, nurseries, health trainers and EHP’s could be well placed to administer such sessions.

Funding has been secured to roll TFAC out to another 10 schools across the borough, selected using National Child Measurement Programme (NCMP) data (Percentage year 6 Overweight & Obese). These schools are situated in some of Wirral’s most deprived areas.

It was acknowledged that the quality of marketing and publicity for EWW retailers was below the desired level. A bid for public health funding has been submitted to improve marketing.

The Public Health Team works alongside Environmental Health and Trading Standards to promote EWW. This is an example of the benefit of more integrated working across Council teams.

**Recommendation 6:** It is recommended the effective delivery and marketing of the Eat Well Wirral and Takeaway for a Change initiatives is prioritised and the schemes are properly evaluated to demonstrate their long term impact. The development of EWW takeaways and their locations should be a matter drawn to the attention of the planning committee at regular intervals.

Policy changes are not the only tools available to control licencing or planning. The initiatives described above demonstrate the effectiveness of partnership work. All stakeholders have emphasised to the Panel the importance of joint working, to better understand issues and to develop innovative solutions. A cross-departmental officer group is developing an action plan to improve joint working across teams and partners. This places a strong focus on whether licensed premises are selling alcohol responsibly. This is a broader approach which considers the wider data available to provide a comprehensive local picture of impact.

**Recommendation 7:** The Panel supports the creation of a cross-departmental working group and action plan for selling alcohol responsibly. The Health and Wellbeing Board should oversee the activities of this group and ensure they are joined up with the Wirral Resident’s Live Healthier Lives pledge delivery group so that further partnership opportunities and targeted initiatives are explored.
6.0 Appendices

Appendix 1

Wirral On & Off License Locations
Shading by Intensity

October 2015

SAFER WIRRAL
Wirral Community Safety Team
Data Intelligence Management
Appendix 2 - Hospital admissions for alcohol attributable conditions 2008/09 to 2012/13