

Regulation 19 Consultation  
Planning Policy Team  
Third Floor  
Town Hall  
Lancaster Road  
Preston  
PR1 2RL

**Date:** 11 April 2025

**Our ref:** 67713/01/RCA/SRo/33653217v1

To Whom It May Concern

## **Response to the Central Lancashire Local Plan Regulation 19 Consultation**

On behalf of McDonald's Restaurants Limited ("McDonald's"), we set out below comments on the Central Lancashire Local Plan Regulation 19 Consultation version ("CLLP"). This has been published for public consultation on 24 February 2025 by Preston City Council, South Ribble Borough Council and Chorley Council ("the Councils"). The consultation is open for comments until 14 April 2025.

### **About McDonald's**

The McDonald's brand is globally recognised and has been trading in the UK since 1974. McDonald's operates more than 1,400 restaurants across the UK and employs over 200,000 people either directly or indirectly through the supply chain.

89% of McDonald's restaurants are operated as local businesses by franchisees. This provides an opportunity for local investors to benefit from the McDonald's global marketing and branding; comprehensive training programmes; and established supply chains.

Between 2018 and 2023 (inclusive), McDonald's invested £618 million in delivering new restaurants and reimagining their existing sites to ensure they provide the best possible customer experience. This activity supported on average 1,305 full-time equivalent ("FTE") construction jobs each year, with a further 1,540 FTE jobs supported in the supply chain and wider economy. It also included McDonald's first restaurant built to the UK Green Building Council 'net zero' emissions standard, in Market Drayton.

McDonald's supports local jobs across the three local planning authorities that make up the CLLP area. They operate from locations including Preston City Centre, Chorley Town Centre and Leyland Town Centre, amongst others.

The consultation asks respondents to relate any comments to the tests of soundness. Paragraph 36 of the National Planning Policy Framework (2024) (“the Framework”) states that, to be sound, a plan must meet the following tests:

- **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with National Policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

In addition, paragraph 16 of the Framework states:

*“Plans should:*

*a) be prepared with the objective of contributing to the achievement of sustainable development;  
...”*

And paragraph 85 of the Framework states:

*“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt...”*

McDonald’s comments on the CLLP are set out below.

## **Draft Policy HC2: Hot Food Take-aways**

Based on Lancashire County Council’s ‘Hot Food Takeaways and Spatial Planning’ topic paper, part (b) of this policy seeks to limit new hot food takeaways outside of centres listed in part (a) of the Policy. Part (b) states:

*“Outside of centres listed in a), hot food takeaways will not be permitted:*

*iii. In wards where the most recently published National Child Measurement Programme data classifies 10% or more of Reception pupils or 15% or more of Year 6 pupils as obese (including severely obese); or,*

*iv. Within 400m of a secondary school entrance, unless opening hours are restricted at school opening times, lunchtimes and school closing times.”*

McDonald’s both welcomes and shares the commitment of the Councils to taking action on public health and reducing health inequalities. Between 2020 and 2024, McDonald’s removed 150 tonnes of

fat, 18.8 tonnes of saturated fat, 34.9 tonnes of salt, 2,672 tonnes of sugar and 11.8 billion calories from their menu. 93% of their core food and drink menu in the UK is now 500 calories or under. 57% of their core menu is non-high in fat, salt and sugar (“HFSS”) and 68% of their Happy Meal products are non-HFSS.

In 2022, McDonald’s launched their Nutrition Innovation Council to create recipe reformulations and innovations that offer more balanced options that taste delicious. In 2023, McDonald’s switched to promote Grilled over Crispy Chicken in Wraps and Salads across all platforms resulting in an increase in the share of Grilled Wraps selected by customers. These changes are making a big difference to their menu and customers’ choices.

McDonald’s acknowledge all hot food takeaways must be mindful of their responsibilities in relation to public health. In assessing planning applications for these uses, therefore, this draft policy could explicitly require applicants to first demonstrate the wider economic, social and environmental contribution they would make to the communities which they intend to serve. In this regard, McDonald’s is committed to operating as a valued and responsible member of the communities in which it operates. Encapsulated by their ‘Plan for Change’, this is supported by a range of health and sustainability based initiatives, commitments and activities including:

- **Delivering strong staff training programmes** – McDonald’s invest more than £62.5 million in learning and development each year, supporting structured training including the opportunity to gain nationally recognised qualifications in hospitality, literacy, and numeracy all the way up to full business degrees. Approximately 70% of McDonald’s employees are aged between 16-24, further emphasising the importance of a strong training programme to enhance the development and work experience of school leavers and young people.
- **Encouraging young people to lead more active lives** – McDonald’s has a long tradition of supporting community football, having provided financial support to improve the standards and growth of grassroots football across England, Scotland, Wales and Northern Ireland since 2002. McDonald’s Fun Football programme is the UK’s largest mass participation football programme and seeks to deliver 10.5 million hours of coaching, recruit 100 female coaches, and provide training to over 800 coaches by 2026.
- **Ronald McDonald House Charities UK** - Together with their customers and franchisees, raising £10 million a year for Ronald McDonald House Charities UK up until 2025.
- **Makin’ it** – McDonald’s work with BBC Children in Need to improve outcomes for young people through Makin’ it, a programme set up to provide young people with genuine opportunities in their communities. As one of the country’s biggest youth employers, and together with BBC Children in Need, McDonald’s are using the power of youth work to provide safe, welcoming spaces in their restaurants and funding music and football programmes to provide training, real-world experience and opportunities for young people in their communities. It’s their mission that, by 2026, every one of their 1,435 restaurants will be connected with youth services, supporting 460 youth work projects and 100,000 people in the process.
- **Happy Readers** - Through their Happy Readers programme distribute a minimum of 7 million books across the UK and Ireland each year between 2023 and 2026.

- **Food redistribution** - Fund the redistribution of at least 1 million meals a year, every year, and connect their supply chain to FareShare to redistribute surplus food.
- **Food Waste** - McDonald's has developed a system to minimise food waste with restaurants utilising technology to ensure no ingredients are used up unnecessarily and that any waste in kitchens is responsibly managed by their logistics partner. Their logistics fleet has been powered by biodiesel from used cooking oil from their restaurants since 2007.

Planning Practice Guidance does promote healthier food environments and suggests limiting the proliferation of, but not banning, such uses. Broadly, this is a balanced policy approach. McDonald's already works closely with local planning authorities to ensure their new restaurant proposals are aligned with local and national sustainability objectives, 20-minute neighbourhoods and 'Town Centre First' polices.

However, there is a notable inconsistency in the current approach of development plans across the country to 'hot food takeaway' uses, which makes the planning application process more complex than it needs to be, and also makes it difficult for McDonald's in terms of their investment strategy. In particular, and despite the lack of any clear evidential link, some local plans already effectively ban such uses from certain wards with high levels of childhood obesity. Ultimately, this policy approach relies on a disproportionate link between a single land use classification (hot food takeaways) and the incidence of obesity in children, and penalises those operators making efforts to reformulate healthier menus and meal choices. It neglects to take account of both the many and varied wider contributions to adverse health outcomes in society, and the availability of unhealthy and calorific foods at a range of other types of outlets operating within a different land-use classification, such as restaurants, bakeries, coffee shops and supermarkets. It also ignores the innovations from businesses – like McDonald's - that are continuously evolving and will help to drive more sustainable practices.

This situation is exacerbated by inconsistencies in the classification of different land uses in England through the Town and Country Planning (Use Classes) Order 1987 (as amended most recently in 2020), which does not take into account the calorific content or potential health impacts of those specific uses and operations. For example, a 'Class E' operator which does not strictly 'cook' hot food for consumption off the premises, but retails highly calorific drinks, and baked goods /confectionery - including food and drink HFSS - is not currently subject to any potential restrictions. This is in contrast to McDonald's, who seek planning permission for Class E / Sui Generis Hot Food Takeaway (reflecting the significance of takeaway sales in most locations) and who are subject to policy restrictions.

In this context, there is not currently a level playing field across the food and drink sector – both in terms of planning and development, and indeed public health more generally. Whilst we appreciate that this is not the appropriate consultation to be seeking amendments to the Use Classes Order, the point remains valid as it demonstrates an inconsistent approach in relation to the food and drink sector. Linked to this, a consistent and proportionate approach should also be taken to the assessment of the economic benefits, in line with wider national policy aimed at delivering economic growth.

McDonald's is also committed to developing sustainable restaurants and, as part of their 'Plan for Change', has set an ambition to be Net Zero in the UK & Ireland by 2040. The 'Plan for Change' builds on the progress McDonald's have made over several years which includes buying 100% renewable electricity for use in their restaurants and opening their first Net Zero standard restaurant that will

provide the blueprint for all future new builds. Also, in the context of the transition to electric vehicles that is currently taking place, McDonald's have committed to rolling out electric vehicle (EV) rapid charging points across all drive thru restaurants throughout the UK.

McDonald's therefore has concerns about the evidential basis which has informed the use of arbitrary administrative boundaries (i.e. wards) in part (iii) of criterion (b) of Policy HC2, which will effectively impose a blanket ban on new hot food takeaways in their entirety in the majority of wards across Central Lancashire. As well as limiting consumer choice, this has the effect of stymieing McDonald's development pipeline across whole swathes of the country and, in doing so, exacerbating symptoms of extreme overtrading (including adverse effects on nearby residential amenity, antisocial behaviour etc.) which their development pipeline ultimately seeks to address. Over time this will cause major issues for both McDonald's and the hospitality sector as it will impact future investment and the associated economic and regeneration benefits from such developments.

This represents a significant obstacle for McDonald's in seeking to deliver sustainable development and therefore is in conflict with the aims of the Framework which seek to generate investment and create jobs (§85), encourage footfall (§90a), and stimulate regeneration (§129d). The draft policy as written therefore conflicts with the requirement for local plans to be positively prepared, justified and consistent with national policy.

To be made sound, the emerging policy should take a positive, justified and sustainable approach to development, as required by national policy and Section 39(2) of the Planning and Compulsory Purchase Act 2004, by deleting part (iii) of criterion (b) of Policy HC2.

It is also considered that part (iv) of criterion (b) of Policy HC2 should be amended in order that it is more precise, and clearly defines the 400m zone, as set out below:

*"Within 400m **walking distance** of a secondary school entrance, unless opening hours are restricted at school opening times, lunchtimes and school closing times."*

If you require any clarification or additional information, please let us know and we will be happy to assist. We would be grateful if you could keep us informed of any future consultation on this or other emerging planning documents.

Yours faithfully



**Steve Rowe**  
Senior Planner  
BSc (Hons) MSc MRTPI