





GUY'S & STTHOMAS' CHARITY

The recommendations in this report are based on research done in partnership with Guy's and St Thomas' Charity

Routing out childhood obesity

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During the small window of time that young people travel to and from school every day, the street environment around them has a disproportionate effect on their diet and lifestyle. Building healthy food environments in the school and home are crucial, but these efforts can to some extent be compromised by the obesogenic world they experience between the school gates and the front door.

Following the outcome of a mixed-method research project in partnership with Guy's and St Thomas' Charity (the Charity), the Royal Society for Public Health (RSPH) are making a range of calls to transform the street environment, particularly around schools, with the ambition that all children should have access to a healthy route home.

1: Addressing the junk food offer



- Local authorities to introduce A5 planning restrictions within 400m of all primary and secondary schools.
- Exploration of novel licensing tools as a means to reduce after-school consumption of food at unhealthy fast food restaurants.
- An end to the school children discounts offered by unhealthy fast food outlets near schools.
- A ban on app-based food delivery services delivering junk food to school gates.



2: Places to go

- Youth-led improvements to green spaces.
- Physical signage outside school gates directing children to their nearest park or green space as they leave school.
- More safe and social areas for young people to congregate near schools.
- Open up school grounds during the school holidays.





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3: Transforming active travel for young people

- Councils to consider implementing and extending the 'School streets' scheme, transforming roads outside schools, so that only pedestrians and cyclists can use them at school start and finish times.
- The Department for Transport update traffic sign regulations to permit the building of zebra crossings without beacons or zig-zag lines.
- Cycle storage to be made available at all schools, enabling more children to cycle to school.
- Safe and segregated cycle lanes separated from traffic-heavy roads to be established, tracking popular routes to schools.
- The Department for Transport to propose a revised funding settlement for active travel. The Government must increase spending on active travel now, and provide future funding that is sustained, long-term, and increases as a proportion of overall transport spend over time.

4: Limiting the reach of advertisements

- Local authorities to ban junk food advertisements across council owned advertising sites.
- Councils to be further supported to restrict advertising of HFSS products on public telephone boxes and remove obsolete phone boxes which can still be used to advertise unhealthy foods.
- Limits to be placed on shop-front advertisements for unhealthy foods.
- The Advertising Standards Authority (ASA) to review the 100m restriction on HFSS advertisements near schools.
- The ASA to have, and use, powers to levy fines on any company that breaks advertising rules more than once in 3 years.
- Limits to be placed on shop-front advertisements for unhealthy foods.



With nine children in every year 6 class overweight or obese, childhood obesity in the UK poses a serious, yet fixable, public health challenge.¹ The widening gap between rates in the most and least deprived areas shows that the environments where children grow have a profound effect on their health.² We believe all children deserve the same chances to thrive and be healthy, no matter where they live.

Guy's and St Thomas' Charity (the Charity), working primarily in the London boroughs of Lambeth and Southwark, have a goal of bringing the high obesity levels in neighbourhoods with the lowest incomes down toward the level of more affluent ones. These two boroughs have especially high childhood obesity rates, often concentrated in pockets of high socioeconomic deprivation, and London itself has higher childhood obesity rates than any of its global peers.^{3,4}

However, as urgent as this challenge is, there are concrete measures within our grasp to address it. Society is awash with unhealthy options and opportunities, and we know this affects how healthy and active our children can be – but at the same time we must recognise that this puts the solution in our hands. We have created these environments: it remains in our power to change them.

The Royal Society for Public Health (RSPH) has campaigned on and conducted research into how to build healthy environments for the public, primarily as part of their *Health on the High Street* campaign. As organisations with priorities in common, RSPH and the Charity have collaborated on a project with two key goals in mind.

First, we aimed to understand what can be learnt by looking more closely at the obesogenic environment: mapping the most obesogenic elements of the street environment, and understanding how they tie into local obesity rates. This mapping included generating a scale for measuring the obesogenic environment, developed by adapting earlier work by RSPH, and which took into account factors such as availability of green space, levels of junk food advertising, and attractiveness to pedestrians. Second, we aimed to combine street-level mapping and fieldwork with first-hand insight from children throughout Lambeth and Southwark, in order to paint a picture of the key street-based influences on diet and activity experienced by a child over the course of an ordinary day.

Feeding into both goals was a series of focus groups and interviews with school children from across Lambeth and Southwark, conducted between February and June 2019, as well as national polling conducted in August 2019 looking into public attitudes towards potential measures for shaping a more health-promoting environment.ⁱ The public opinion statistics quoted hereafter are sourced from this polling, and the quotations distributed throughout are sourced from the qualitative work undertaken.

Fundamental to this collaboration is the conviction that change is possible, and that any genuine and lasting approaches to ensuring healthy and active lives for all children must focus predominantly on altering the environment in which an individual exists. It is often remarked that obesity is 'a normal response to an abnormal environment'.⁵ The recommendations set forth in this report aim to improve the health and wellbeing of all children by disrupting that abnormal environment.

¹Polling conducted through Populus in August 2019, with a UK-representative sample of 2,000 adults.

Key learnings

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People's **lived experience** of their neighbourhood has an important impact on how they differentially interact with features of their environment.



There is often a crucial window of exposure to obesogenic environments for children during their **daily routes to and from school**, which can have a substantial impact on food consumption.



Unhealthy fast food outlets have in some cases become de facto **extensions of the school environment**. This often isn't driven by a desire for food but by a lack of other appropriate, safe, affordable and socially acceptable spaces for young people after school.



Positive food environments in the school and home can easily be undermined during the post-school period.



Advertising exposure and tailored marketing has a large influence on driving young people to consume more.



More attention must be paid to **the needs of teenagers in the design of green space**, with youth-led initiatives to address the lack of age-appropriate equipment in many parks.



The healthy route home

Throughout our research we found that for children living in large urban centres, the period of the day after leaving the school gates but before arriving home was absolutely crucial in influencing what children eat and how much they run, play or otherwise exercise. When the bells ring at the end of the day, a typical school child finds themselves in a situation they would otherwise rarely experience: with time to spare, friends to follow, change in their pocket, no adult direction, little or no youth provision, and a junk food offer within minutes on foot.

The majority of the children we spoke to said that nearly all their visits to fast food outlets were on the return route from school to their home. This means that understanding the immediate environment around schools and how to influence it is a critical stage in improving the flow of healthier food options in a child's everyday experience.

The broader message from these insights is that the context in which children experience the street environment is critical. Understanding the positive and negative assets of an urban environment is important, but it is not useful without an understanding of the ways children experience and interact with the street environment in their everyday lives.

This point was further backed up by the mapping work conducted across Lambeth and Southwark. For this, an 'obesogenic environment scale' was used to provide a measure for how obesogenic each electoral ward was across the two boroughs – based on the prevalence and quality of various features of the street environment, such as fast food outlets and green spaces. These scores were then compared to the childhood obesity rates in each ward, and as one would expect, the more obesogenic wards tended to have the higher levels of childhood obesity. However, this correlation was not strong, and there were some notable wards that bucked the trend completely, having either sky-high obesity rates but a (relatively) healthy environment score or vice versa. One good reason for these anomalies is that children gain a lot of their exposure to the obesogenic environment when in the vicinity of their school, and often this is some distance from their home (and well outside the ward they live in). This reflects the wider point that children, like adults, do not exist in isolated settings, but live their lives in multiple overlapping contexts, and as such we need to better understand the key transitions between them. One of these key transitions – and the one which this report focuses on – is the journey between the school gates and the front door. There is a lot of good work being done within schools in terms of improving diet, but our qualitative work showed that, unless we transform the immediate street environment for children, positive food environments in the school and home can easily be undermined during the postschool period – at which point teachers and parents have little to no influence.



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Further research into the environmental influences at play during a young person's journey from the school gates back home.

The route home from school is potentially a difficult thing to learn about and influence, as it is often a time children spend with their peers, and not with adults. But it is for this same reason that it is such an influential period in a child's day. The forces of peer conformity, convenience of access, and the rare freedom to spend what loose change they have all come together to make this post-school window of time a crucial determinant of diet. Future research would benefit from aiming to understand this crucial context to a child's everyday life in more detail.

The following four sections of this report are all aimed at disrupting different parts of that journey to and from school: tackling junk food outlets, providing healthier places for young people to go, boosting the active travel offer, and limiting the influence of advertising. Guided by these four distinct but related challenges, the recommendations we set out aim to address that critical window in a child's daily routine – joining the dots to support a healthy route home.



1. Addressing the junk food offer

If you wanna go to a fried chicken shop you find the nearest secondary school, and then you know, there's gonna be one there

A trip to the nearest fast food outlet is a common feature in the after-school period for many children. A variety of reasons were given for the popularity of these outlets, but for the large part the motivations are simple: they're cheap, and they're there.

At 2:50 everybody will go to the chicken shops and flood the chicken shops

You can see very clearly lots of children in the chicken shop round school [...] and so it's very visible that they're eating lots of junk food outside schools

(Secondary school teacher, Lambeth)

This is backed up by the data: the number of fast food shops within 400m of schools (approximately a 5 minute walk) is increasing in England, according to data from Cambridge University's Centre for Diet and Activity Research (CEDAR), and is particularly high in London boroughs.⁶ Schools in London have an average of six fast food shops within a 5 minute walk of the gates, with this figure rising to eight or more in some of the poorest areas. Across England as a whole, areas in the poorest decile play home to a density of fast food outlets five times higher than areas in the richest decile.⁷ As one school child in north Lambeth worded it during an interview, "if you want to find a fried chicken shop, go to the nearest secondary school."

If there was no chicken and chips around this area, everybody would just eat at lunch and then go home and have some food

A number of studies both at home and abroad have indicated a significant link between repeated exposure to fast food outlets along daily commutes, fast food consumption, and obesity.^{8, 9} Given what is known about the link between availability and consumption of fast food, one would expect that reducing the number of outlets near schools would have a positive effect on the diets of school children. A survey of 2,500 secondary school students in Brent illustrated this point: those at schools with fast food shops within a 400m radius were substantially more likely to visit those outlets once a week or more than those at schools with no such shops within 400m (43%).¹⁰

* All quotes attributed to 11-14 year old school children from Lambeth and Southwark, unless otherwise stated.

A number of English councils have already implemented 400m exclusion zones by writing the restrictions into their planning policies – some notable examples include St Helen's, Sandwell,¹¹ Dudley,¹² Milton Keynes,¹³ and Luton (ongoing)¹⁴ – and it was also proposed by Mayor Sadiq Khan in the new draft London plan.¹⁵ While far from all councils have taken these steps, a significant number (164 out of 325) now have policies specifically targeting takeaway food outlets in some way, with 56 of those focused on health.¹⁶



Local authorities to introduce A5 planning restrictions within 400m of all primary and secondary schools.

We are calling for local authorities to introduce planning restrictions on fast food in their local planning schemes; however, it must be noted that this approach is necessarily limited as it can only be used to stop outlets opening, and not to close existing ones. While it is important that comprehensive planning policies are in place so that fast food prevalence near schools cannot increase, it is also vital that councils are able to reduce the current number of outlets near schools (or at least their sales of unhealthy food to school children) - which is already unacceptably high in many areas. Local authorities need the tools to tackle the existing problems, rather than just stemming the growth. Polling shows that these measures would have public backing, with two thirds (65%) backing a ban on unhealthy fast food outlets within a 5-minute walk of school gates.

Two thirds of the public (65%) back a ban on unhealthy fast food outlets within a 5-minute walk of school gates

One novel way of approaching this problem would be through introducing licences for unhealthy fast food outlets. Businesses would have to apply for a licence from the council in order to operate, and by placing certain conditions on that licence, those businesses would be either incentivised or required to reduce their unhealthy food offer near schools.



Exploration of novel licensing tools as a means to reduce afterschool consumption of food at unhealthy fast food restaurants.

Measures to be modelled and piloted could include restricting the operations of outlets within a 400m radius of schools, such as restrictions based on age or opening hours.

The closer the shop, that's what I'm attracted to.

McDonalds does breakfast now, so everyone just goes for breakfast at McDonalds as well

Licensing requirements for fast food outlets could be stipulated in one of three main ways. Some of the more promising options for targeting a child's unhealthy route home include a distance-based licence – e.g. requiring outlets to be more than 400m from any school - or a licence based on opening hours – e.g. banning the sale of unhealthy food during the post-school hours of the day. This latter proposal would be supported by almost half the general public (48%). The third and more direct option - age of sale restrictions - may be less feasible, but should also be explored. Another alternative model would be to financially disincentivise (rather than ban) the above practices. That is, businesses could continue to sell food near schools, but would have to pay a costly licence fee to do so.

These are exciting new possibilities as they could, if proved workable, lead to a significant upgrade in councils' ability to tackle unhealthy fast food outlets on their streets. Such a system would also provide an extra source of revenue for the council through the cost of the licence, which could potentially be directed towards improvements to park-based infrastructure – a proposal backed by 59% of the public.



We don't have much money to like spend so I think putting chicken shops close to our schools and stuff, it's kind of taking advantage of... yeah, kids. It sounds really bad but it's true.

Four in five (80%) of the public would put an end to the school children discounts offered by unhealthy fast food outlets near schools.

Another aspect of the after-school fast food offer is that many outlets will offer targeted discount deals to school children, capitalising on the comparatively small purchasing power of school children. It was also reported by school children that even when a deal is not advertised explicitly, most unhealthy fast food outlets near schools will give an informal 'school kids' discount to anyone in school uniform. Four in five (80%) of the public agree that outlets should not target school children in this way. Both these practices are unacceptable targeting of children, and should also be considered in the context of potential licensing – for example, whereby such discounts are banned as a condition of the licence.

Parents only give us a small amount of money, so obviously we buy cheap food, which is the junk food.

fast food is quick and you don't want to wait when you're hungry.



project, although several focus group participants recalled vouchers for food delivery apps being given out to school children outside their school gates.

It is vital that as the fast food offer to children is reduced at physical outlets, app-based delivery services are not permitted to fill this gap via the back door.



A ban on app-based food delivery services delivering junk food to school gates.

Interestingly, there was no notion amongst any school children interviewed of a 'healthy' fast food option being possible. In contrast, 'unhealthiness' was perceived almost as if it was central to the concept of fast food. This lack of conceptual space for food that is both healthy and quick to arrive is reflective of the scarcity of such offerings on the high street.



An end to the school children discounts offered by unhealthy fast food outlets near schools.

Cause it's a one pound to get like four wings and chips... yeah, we'll just get that.

A separate but growing aspect of the junk food offer to children after school is through delivery from appbased food delivery services – behaviour that polling shows 80% of the public would have banned. In early 2019 it was reported by the Times that products from multi-national fast food chains were being delivered by well-known food delivery apps to school gates in Grenwich, despite the companies having an agreement in place that this would not happen.¹⁷ This specific behaviour was not reported during this



2. Places to go

Many school children identified a peer effect as one of the reasons so many frequent fast food outlets after school. They have, for many, become seen as the socially desirable place to go, leading to a positive feedback loop: often, people will go simply because others are going.

It's so much easier to just go with the group.

In some cases, fried chicken shops have become de facto extensions of the school environment. The focus groups highlighted that this often is not driven by a desire for food (though it sometimes is), but by a lack of other appropriate, cheap and socially acceptable spaces for young people nearby after school.

There's always teachers outside the chicken shop after school because they know we go there so much... there's even our school rules on the wall.

If no one went to a chicken shop there would be no one to go with so you would just go home or somewhere else.

The measures outlined in section one go some way to addressing this problem by making unhealthy food outlets less easily accessible, but they will not be fully effective unless accompanied by improvements to alternative spaces for young people to go and congregate after school. The opinion polling also shows that the proposals in this section are consistently popular among the public.

One of the most consistent findings from the focus groups was regarding the perceived quality of parks, and the effect this has on usage. All participants had little concern over the proximity or size of parks, but both the 11-year-olds and 14-year-olds were, as a rule, unsatisfied with the state of them, seeing parks as 'not for them'. The main reason given for this was the lack of age-appropriate infrastructure. For example, often parks have apparatus like small swings or features aimed at toddlers and small children, but nothing aimed at young teenagers - whether that be adventure playground apparatus, large swings, running tracks, or biking/skateboarding infrastructure and internet for the older groups. It is telling that the majority of the wider public (62%) also agreed that parks and green spaces are not designed with the interests of teens in mind. What is clear is that if young people are to be incentivised to spend more time in parks, either being active in the park or using it as a space to congregate socially, then improvements to the parks must be co-produced with those young people in order that the final offer is attractive to the right people.



There's a place with seesaws for like kids and there's a nature garden which is for like adults but for teenagers we don't really have a place, there's not like an allocated area.



Youth-led improvements to green spaces. Improve parks, by including more age appropriate infrastructure. Adventure playgrounds, running

tracks, skateboarding/biking facilities where appropriate, Wi-Fi and shelter.



More safe and social areas for young people to congregate near schools, as an alternative to congregating at the nearest

fast food takeaway – a target that more than four in five of the public are in favour of (83%).



Physical signage outside school gates directing to the nearest green space, with improved infrastructure along those routes

to better connect children to their nearest park as they leave school - backed by two thirds of the public (68%).



Open up school grounds during the school holidays, to increase the green space available to young people in the area – again backed by four in five of the public (79%).

3. Transforming active travel for young people

Incorporating active travel into young people's lives is a relatively easy way to promote routine physical activity. Being physically active can have multiple benefits for physical health that go beyond curbing weight gain, as well as for mental health and wellbeing. It is also a great way to reduce traffic congestion and with it the alarming levels of air pollution and road accidents seen in London and other large urban areas.

Unfortunately, for many young people and their parents, the built environment still offers many obstacles to taking up active travel, and this is reflected in the persistently low proportion of journeys taken on foot or by bicycle. The percentage of all pupils walking to school in England has now remained at 44% for the past two years (51% at primary age; 37% at secondary).¹⁸ Despite a brief upturn in 2016 (to 46%), these figures are the latest in a steady downward trend in walking rates since 2006, when they peaked at 49%.¹⁹ In London the numbers choosing to get to school on foot are higher, but only slightly - at 52% of all pupils leaving much room for improvement still.²⁰ This much was acknowledged by London's walking and cycling commissioner, Dr Will Norman, who said in December 2018 that 'sadly, far too many children in London aren't as active as they should be. Walking, cycling and scooting to school are fun and easy ways to build more activity into the day.'21

One way to improve the prospects of pedestrianfriendly cities in the future is to make it easier for councils to build street features which enhance footfall, favouring pedestrian journeys over cars. An example of this is the zebra crossing. At present under UK law, new zebra crossings require wiring to the electric mains and Belisha beacons on both pavements. If the crossings were legally permitted with just the road painting alone (as is widespread practice across Europe), they could be introduced by the council for just £300, representing a 100-fold cut in costs.²² Greater Manchester's walking and cycling commissioner has argued in favour of this as part of plans for a fully joined-up cycling and walking network including 'thousands of zebra crossings across Manchester' - an approach that could be emulated elsewhere, should zebra crossing regulations be amended to permit it.23





The Department for Transport to cut the cost of pedestrian crossings 100-fold by updating traffic sign regulations to permit the building

of zebra crossings without beacons or zig-zag lines.

The picture for cycling is bleaker, with the proportion of pupils using a bike to get to and from school hovering on around 3% (rising to around 4% among secondary school students).²⁴ A cursory glance abroad tells us that things need not be this way. In the Netherlands, where there has been sustained investment in cycling infrastructure over time, students who cycle to school are in the majority, with four in five 12-15 year-olds choosing to travel to school by bike.²⁵

Moreover, analysis has shown that this gulf in cycling rates cannot be explained by flatter terrain and shorter journeys in the Netherlands.²⁶ Models using the Department for Transport-funded 'Propensity to Cycle' Tool (PCT) suggest that if English children felt as able to cycle to school as their Dutch counterparts (for trips of the same hilliness and length), more than two in five of them would do so – a more than twenty-fold improvement on current levels.²⁷ Progress towards realising this potential is possible, but only if we are prepared to reshape the built environment, and create the conditions that will prioritise children over cars. Responses in the focus groups indicated that few participants even knew anyone who cycled to school, and the two recurring justifications for not doing so themselves were unsafe roads, and the lack of cycle storage at school.

'School streets' are one example of interventions that put the interests of children's wellbeing above vehicles in this way. These are relatively simple schemes whereby councils put up signs, barriers or cameras around schools in order to stop non-residents driving through the area during peak school times, and are backed by two thirds of the public (64%). These have been implemented in many areas already, and shown to be effective at leaving streets clear for children to walk, cycle and play, free from the perceived and real dangers of nearby traffic.²⁸



Councils to consider implementing and extending the 'School streets' scheme, transforming roads outside schools, so that only pedestrians and them at appeal start and finish times

cyclists can use them at school start and finish times.

Through Transport for London's (TfL) 'STARS' scheme ('Sustainable Travel: Active Responsible Safe'), many London schools have now been supported through taking proactive steps to improve their active travel offer, and gain accreditation.²⁹ The STARS scheme supports over 125 school-based interventions and campaigns, all helping to drive up cycling and walking rates – though some will be more suitable than others depending on the local school environment. These include measures such as improving cycle parking at primary and secondary schools, with guidance on how to secure funding from local authorities.

On top of this, cycle lanes on popular school routes should be fully segregated from other traffic. This is important because it makes cycling safer – but also because it makes cyclists feel safer. Consequently, segregated routing is one of the most effective ways of encouraging cycling, as is supported by evidence both from London and from leading cycling cities abroad.³⁰

If cycling to school is to grow in popularity, it needs to be perceived by young people as both easy and attractive. Although not sufficient on their own, these two recommendations are vital for achieving that goal – and are both backed by 85% of the public.



Cycle storage to be made available at all schools, enabling more children to cycle to school.³¹



Safe and segregated cycle lanes separated from traffic-heavy roads to be established, tracking popular routes to schools.



Funding

The obstacles to improving walking and cycling rates to school are part of a wider problem of insufficient funding for active travel in England. In 2017 the Government set out its Cycling and Walking Investment Strategy, setting out various funding streams and ambitious targets, and yet has accepted that 2019 investment levels are nowhere near sufficient to achieve them.³² For example, there is a stated goal to double cycling activity by 2025, but no plan for how to achieve this without doubling investment.³³

Although Government spending on active travel has increased in recent years – and despite the welcome extra £20 million towards cycling routes announced in September 2019 - the current promised £400 million a year is dwarfed by the budget for other forms of transport, coming in at just 1.5% of total transport spending in England.³⁴ The Department for Transport should make sure a long-term funding settlement for active travel is provided to local authorities, as recommended by the Commons Select Committee for Transport in their July 2019 review of active travel.³⁵ This commitment would give councils the freedom they need to make long term plans that reprioritise in favour of active travel, and support them in implementing changes such as those recommended in this section.



The Department for Transport to propose a revised funding settlement for active travel. The

Government must increase spending on active travel now, and provide future funding that is sustained, long-term, and increases as a proportion of overall transport spend over time.

4. Limiting the reach of advertisements

Another typical feature of the street environment is the aggressive advertising of unhealthy food, too often taking centre stage in a child's everyday experience, with healthier options being pushed to the side.

In early 2019 the Mayor of London introduced a ban on unhealthy food and drink advertising across the entire Transport for London (TfL) network – including tubes, buses and bus stops.ⁱ Across the focus groups and interviews (which took place just as the policy was coming into force), the majority response among children when they were told of the ban was disappointment and consternation.

How are we going to find out about the next burger?

They regarded advertisements as an important source of information for their fast food choices, and as a result many ended up grudgingly suggesting that the ban was a positive step. Typical responses also included an acknowledgement of so-called 'pester power' and how influential it can be on parents' food decisions.

The ban is good because it stops you buying the food.

[It is] bad in the short term but good in the long term because parents don't have to buy junk food for kids as they [the kids] don't know what's available.

However, despite the ban in London, advertising remains prominent in many other locations, some of which were recalled by school children in the focus groups, such as large hoardings boards/billboards. Telephone boxes were another typical location children recalled seeing adverts for junk food, including both traditional (and mostly obsolete) payphones as well as new style BT 'InLink' phone boxes.

Many participants said that advertising was the number one influence on what food they eat – especially if there is a limited deal on a new product. This was reflected in the findings of a Cancer Research UK report in 2018, in which young people who recalled seeing junk food adverts every day were more than twice as likely to be obese.³⁷ The same report revealed that, when exposed to HFSS (High Fat, Salt and Sugar) product adverts, nearly nine in ten (87%) young people find them appealing and three in four are tempted to eat the food advertised in them. With this context, it is clear that though the TfL ban was a significant step forward in addressing the advertising landscape of unhealthy food to young people across the capital, there is far more to be done.

¹ This advertising ban was part of the much welcomed London Food Strategy, [GLA, December 2018] which set out the Mayor's plans to restrict HFSS advertising, restrict new hot food takeaways, support the creation of 'health super zones' around schools, and support existing takeaways to improve their food offer through the Healthier Catering Commitment.



"The old and the new"

New style BT 'InLink' phone boxes used as rolling advertising space for unhealthy products. Yards away, McDonalds chicken nuggets being advertised at a bus stop billboard.

[Southwark, 13.03.19, two weeks after the TFL ban came into effect.]

In June 2019, Southwark implemented a ban on the advertising of HFSS products at all council-owned advertising sites across the borough.³⁸ This is an important step forward which complements and builds on the TfL ban earlier in the year, but should not be limited to London. All councils, especially those where childhood obesity rates are above average, should consider emulating this policy, which is supported by more than two in three of the public (68%).

It was also found that many obsolete telephone boxes were still being used to advertise unhealthy foods, and that this was a key advert location recalled by focus group participants. For years, huge numbers of proposals for building telephone boxes were being received by councils, thanks to a legal loophole meaning that they do not require planning permission, allowing them to function as cheap advertising space. Instead, the rules treated phone boxes as 'permitted developments' – applications for which councils have less power to refuse. If all applications to Westminster council had been successful, for example, there would have been a phone box every 15 metres on Edgware Road in London, many of them displaying junk food adverts.³⁹ In February 2019, courts in the borough of Westminster ruled that such phone boxes now require planning permission – giving councils across the UK greater legal precedent to block similar applications in the future.⁴⁰ This landmark ruling has helped, as have two subsequent amendments to the permitted development right in May 2019,⁴¹ but more needs to be done to help councils restrict the types of advertising on phone boxes as well as remove the many remaining but obsolete phone boxes.⁴²



Local authorities to follow the lead of Southwark and other councils in banning all junk food ads across council owned advertising sites.



Councils to be further supported to restrict advertising of HFSS products on public telephone boxes and remove obsolete phone

boxes which can still be used to advertise unhealthy foods.



Four fast food outlets advertisement posters plastered on the the same telephone box station.

[Southwark, 13.03.19]

Looking beyond the powers of local authorities, the main regulatory landscape for outdoor advertising of junk food is provided by the Advertising Standards Authority (ASA), the self-regulatory organisation of the UK advertising industry.

The main way that ASA powers can be used to disrupt the unhealthy route home is through the rule that HFSS food advertisements cannot fall within 100 metres of primary and secondary schools. A 2019 report by Food Active and Sustain, which looked at the junk food advertising space in general but included a focus on the ASA, made several recommendations for strengthening the powers of the ASA and its effectiveness at enforcing restrictions.⁴³ This included reviewing the 100 metre rule and potentially extending it to other settings. Opinion polling indicates that nearly four in five (77%) of the public agree that any areas where children tend to congregate more should be considered unsuitable for junk food advertisements, suggesting that several other key settings should be in scope such as nurseries, children's centres, leisure centres, and family attractions.



The ASA to review the 100m restriction on HFSS advertisements near schools. This should consider an extension of

that distance to reflect the distance children travel from school, and also the case for ruling other areas where children congregate to be unsuitable for such advertisements (for example, nurseries, children's centres, leisure centres and family attractions).⁴⁴

Another finding of the Sustain report was that even when complaints about adverts close to schools were made and upheld, there was little in the way of penalty for the offending company, or disincentive from doing the same again. To address this and deter repeat offenders, the ASA should have greater powers to levy fines on companies that contravene rules more than once in 3 years. Proceeds from fines could be used to make improvements to children's routes home from school.



ASA to have, and use, powers to levy fines on any company that breaks advertising rules more than once in 3 years.⁴⁵

Finally, there is a need to address the extent of in-store advertisements for unhealthy foods, which includes displays that often stretch across entire street-facing windows and onto signs and placards outside on the street. There is no clear pathway to bringing such advertising under control, as it is not within the scope of the ASA; however, there are different options which should be explored.

One option to be explored would be for the current ASA remit around schools to be extended so that it applies to shop-front windows as well. Another route could be through Government, which is currently consulting on in-store promotions and could incorporate such restrictions of part of this or future policy.⁴⁶ A final possibility to be piloted is through restrictions on shop-fronts imposed through licensing, in the manner described in section one.



Limits to be placed on shopfront advertisements for unhealthy foods, particularly when aimed at school children.

Approaches to doing so require exploring and piloting before implementation, and could include novel licensing tools.

Conclusion

The children of today exist in a world that is not built with their health and best interests in mind. They are overwhelmed by the flow of affordable, convenient and unhealthy food options at the end of a school day, all while healthier options and routes are being pushed out of the spotlight as a result of aggressive marketing campaigns, traffic-heavy roads, and poorly equipped public spaces.

To rebuild this 'after-school-scape', we need to be need to be ambitious and keep in mind the whole picture. This means not just giving the retail and advertising environment a drastic makeover, but also committing to sustained investments in cycling and walking routes – making the active lifestyle the norm and not a chore. Meaningful change will not emerge until the Government fully invests in our civic infrastructure, giving councils the backing they need to put into motion a radical revamp of the street environment surrounding our schools. Only then will we stop settling for the current unhealthy offer, and begin to give young people in the UK the healthy options they deserve.

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