

# Response from the Obesity Alliance Cymru

## Theme 1: Healthier Shopping Baskets - Making the Healthy Choice the Easy Choice

**Q1. Should we introduce legislation to restrict the following types of promotion of High Fat Salt or Sugar products?**

- temporary price reductions
- multi-buy offers
- volume offers

Yes/No/Not sure

Yes

Please explain

*Volume based promotions drive greater sales,<sup>1</sup> promote quick consumption rather than sensible stockpiling,<sup>2 3</sup> and are much more prevalent for unhealthy products rather than core staples.<sup>4</sup> We are keen to emphasise that price promotions are not free gifts and should not be considered so by Welsh Government or by the Welsh public; they are mechanisms used to drive sales. Rather than being designed to save people money, they encourage shoppers to spend more than they otherwise would on products which raise the risk of poor health.*

*Polling by Cancer Research UK in November 2018 highlighted that 86% of Welsh adults felt that multi-buy type promotions caused people to buy more unhealthy food, and that Welsh adults more frequently saw unhealthy food on promotion than healthy food or core staples. As obesity rates have increased since 2018, this polling is still reflective of Wales's unhealthy shopping baskets.*

*Research by Cancer Research UK which included a sample size of 800 Welsh adults, published in March 2019, found that almost 30% of food and drink in Welsh shopping baskets is bought on promotion. The study found that people who bought more on promotion were more likely to be overweight, and that they were more likely to buy unhealthy food and less likely to buy fruit and vegetables. As promotion use increases, adults buy more carbohydrates, sugar and saturated fat, and less protein and fibre.*

*Evidence also shows that low-income families are not dependent on price promotions to feed their family – evidence by Cancer Research UK (supported by*

evidence from Food Standards Scotland) show that higher income families buy more on promotion as a proportion of their shopping basket than lower income families.<sup>5 6</sup>

We would also like to see significant emphasis given to the positive facilitation of promotions of healthy food product choices, both unprocessed foods (e.g., fruit and vegetables) and healthier processed foods.

**Q2. Should we introduce legislation to restrict the placement of HFSS products in the following retail areas?**

- store entrance
- at the till
- end of aisle
- free standing display units

Are there any other locations you think we should consider?

Yes/No/Not sure

Yes

Please explain

*We encourage Welsh Government to restrict retailers and manufacturers from promoting unhealthy food and drink by location – particularly at the end of aisles, checkouts, front-of-store and island/bin displays. Evidence suggests that in-store marketing is widely used in the UK to promote unhealthy foods.<sup>7 8</sup> Promotions act as trigger factors to encourage people to buy food, with impulse purchasing representing between 45% and 70% of food purchases.<sup>9 10 11 12</sup> An NHS Health Scotland rapid evidence review on location-based promotions found that the evidence base on increasing consumer purchasing behaviour is both strong and consistent.<sup>13</sup> Research by the University of Cambridge found that restrictions on the promotion of sweets and confectionary at checkouts led to an immediate 17% reduction in purchases, with shoppers still purchasing over 15% fewer items compared to when no policy was in place.<sup>14</sup> Polling by Cancer Research UK in April 2018 found that 58% of Welsh adults saw confectionary and other unhealthy food sold at checkouts in supermarkets within the last week.<sup>15</sup> Further polling by Cancer Research UK in November 2018 found that 65% of Welsh adults believed item placement was influential in unhealthy food purchases.<sup>16</sup> As rates of obesity have*

*increased since 2018, we feel that this polling is still reflective of Wales's unhealthy shopping baskets.*

*Legislation should also be accompanied by guidance on what (healthier) products should instead be placed at store entrance, till, end of aisle and free-standing display units.*

**Q3. How should we determine which categories of food should be caught by proposal 1 and 2 restrictions?**

Option A – Products high in fat, sugar or salt which are of most concern to childhood obesity

Option B – All Products high in fat, sugar or salt

[both options to restrict the promotion of HFSS products captured by the Sugar Reduction Programme, Calorie Reduction Programme and Soft Drink Industry Levy based on the Nutrient Profiling Model]

Other- please give details

Please explain

*Option B*

*From a public health perspective, and with the end goal of reducing obesity levels throughout the population, we would urge the Welsh Government to apply restrictions on promotions to all products classified as HFSS by the NPM, not just those of most concern to childhood obesity.*

**Q4. Should restrictions for both proposal 1- value promotions and proposal 2- location promotions cover online purchasing?**

Yes/No/Not sure

Yes

Please explain

*We agree that the restrictions should also apply to online shopping, to reflect the increasing trend of people shopping online and to ensure a level playing field with retailers that only operate online.*

*A survey conducted in 2022 found that over half of UK consumers (60%) buy at least a portion of their groceries online. <sup>17</sup>*

*There is also evidence that positioning unhealthy products to be less prominent online can help shift consumers to make healthier purchases. <sup>18</sup>*

**Q5. Should the following exemptions apply for value promotion restrictions (proposal 1)?**

- micro and small businesses (unless they are part of a symbol group with 50+ employees)
- close to use-by-date price reductions
- non-pre-packed products
- other

Yes/No/Not sure

Please explain

*‘Yellow label’ items that are close to expiry should be exempt from restrictions, as these promotions make up a small proportion of the market and can be helpful for some very low-income households. They also help to reduce food waste.*

*It is also our preference that micro businesses and non-pre-packed foods should not be exempt but that extra support is in place to allow businesses to adhere to these regulations.*

**Q6. Should the following exemptions apply for location promotion restrictions (proposal 2)?**

- micro and small businesses (unless they are part of a symbol group with 50+ employees)
- stores that are smaller than 185.8 square metres (2,000 square feet) (even if they employ more than 50 employees or are part of a symbol group which does)
- specialist retailers that sell one type of food product category, for example, chocolatiers or sweet shops
- *other*

Yes/No/Not sure

Please explain

*We feel that there is a need to provide consistency and a level playing field for businesses so that rules are clear and applied uniformly, and so that all consumers in Wales are supported to make informed choices on their food and drink purchases.*

*We understand that smaller businesses may have specific challenges in implementing the proposed changes, so we recommend that the Welsh Government work with small businesses to understand what support they will require to successfully do so.*

*A high number of businesses affected by these proposals are likely to be micro businesses, and evidence from a study by Sheffield University shows that 1.2 million people in the UK are now living in 'food deserts,' where people have to shop in more expensive small convenience stores, with a limited stock of good value fresh products. The study also showed that these are more likely to be located in deprived communities and are also likely to be the types of premises that school children will use at lunchtimes.<sup>19</sup>*

*Exempting such premises could potentially lead to a widening inequalities gap in diet and obesity and leave young people unable to access healthy options.*

## **Theme 2: Healthier Eating Out of the Home – Understanding how it contributes to your weight**

**Q7. Should we mandate calorie labelling in all out of home settings regardless of the size of business?**

Yes/no/not sure

Please explain

*We support measures to improve the information provided about the food purchased or eaten outside of the home. Research has found that 9 in 10 people in the UK say that clearer food labelling would help them make healthier food choices<sup>20</sup>. Currently, nutritional information is often confusing and inconsistent, or even absent in some out-of-home settings. Everyone should be able to access quality nutritional information about their food wherever they eat and drink, so that they can make informed choices.*

*Experimental evidence also indicates that energy labelling (calories) on menus could, for an average meal of 600kcal, reduce the calories bought by about 8%*

*(equivalent to about 50kcal).<sup>1</sup>In addition, the products of companies that include calorie labelling on menu items have consistently less fat and salt overall.<sup>2</sup> Research also suggests that food outlets whose menus are labelled offer significantly healthier products, indicating that calorie labelling could work through encouraging food companies to develop healthier products.*

*We also feel that smaller businesses should receive support to produce calorie labels.*

### **Q8. Should energy labelling be limited to calories (Kcals)?**

Yes/no/not sure

Yes

Please explain

*The most widely used and understood measure of energy in food and drink in the UK is calorie (Kcal) content so we would suggest sticking with that to communicate as clearly as possible with children and families.*

### **Q9. Should menus marketed specifically at children be exempt from calorie labelling?**

Yes/no/ not sure

If no how do you think this information should be presented?

*Given the issues we face around childhood obesity, we support providing parents and carers with calorie information to support them to make more informed decisions on the food provided for their children.*

### **Q10. Should we mandate businesses to make menus without calorie labelling available at request?**

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<sup>1</sup> R.A. Crockett et al. 2018 'Nutritional labelling for healthier food or non-alcoholic drink purchasing and consumption' Cochrane Database Syst Rev 2: Cd009315: <https://doi.org/10.1002/14651858.CD009315.pub2>

<sup>2</sup> D.R.Z. Theis and J. Adams 2019 'Differences in energy and nutritional content of menu items served by popular UK chain restaurants with versus without voluntary menu labelling: a cross-sectional study' PLoS One 14(12): e0226704 <https://doi.org/10.1371/journal.pone.0226704>

Yes/ No/ Not Sure

Are there other mitigations we could put in place for people with eating disorders?

Please explain

*There are concerns that calories on menus will exacerbate problems faced by those already living with disordered eating, who find eating out very stressful. This is a valid concern, based on feedback from people with eating disorders and it must be taken seriously in the context of rising eating disorder prevalence. The Welsh Government should consult with eating disorder specialists to understand the impact of this policy and ensure mitigations are in place to protect those with or at risk of developing eating disorders.*

*Because research is lacking, the Welsh Government should also continue to monitor and review the policy with a detailed evaluation as the policy is implemented. It is essential to look at all aspects of the policy, including eating behaviors on different population groups so that restaurants can be supported to implement this in a non stigmatising way. For example, restaurants could ensure that menus without calories are easily accessible.*

**Q11. Should the requirement to display calorie labelling extend to online sales?**

Yes/No/Not sure

Yes

Please explain

*We agree that the restrictions should also apply to online shopping, to reflect the increasing trend of people shopping online and to ensure a level playing field with retailers that only operate online.*

*There is also a potential to exploit functionalities that can only be implemented online (e.g., add 'summary kcal label' of total shopping basket), which could be useful for customers to make better decisions about their diet as a whole.*

*However, we would like more clarification on how the duty will be put on businesses to provide calorie labelling, and how this will work with online sales by businesses outside of Wales that deliver to Wales?*

**Q12. Should we prohibit free refills of sugary soft drinks in the out of home sector?**

Yes/No/Not sure

Please explain

*We support plans to restrict the sale of unlimited refills to sugary soft drinks. Similar restrictions were introduced in France in early 2017, which targeted soft drinks – including sports drinks containing added sugar or sweeteners (although the OAC are not looking to target drinks with sweeteners as there is currently no UK precedent for this). A study by the Cambridge University Press also found that fast-food customers with a refillable soft drink consumed an additional 250 calories from their soft drink.<sup>21</sup>*

*We also believe that Welsh Government should go further and restrict the sale of unlimited refills of all HFSS products which are not part of main meals. This includes unlimited refills of products such as ice-creams. We are aware that some out of home chain outlets offer unlimited ice creams, with unlimited sweets and sauces.*

**Q13. Should we restrict larger portion sizes of sugary soft drinks in the out of home sector?**

Yes/No/ Not sure

Yes

Please explain

*We support this as it would be consistent with the policy of no free refills.*

**If yes, do you think this should be limited to 1 pint (0.57 litres)?**

Other

Please explain

**Q14. Should the following settings be excluded from both the calorie labelling and soft drink restriction requirements?**

- schools and colleges
- early years and childcare settings
- hospital in-patients
- care homes and settings



- charity sales
- other

Yes/No/Not sure

Please explain

*We feel that schools and colleges could be exempt but only if the current nutritional guidelines are adhered to nationally.*

*We are aware that concerns have been raised about adherence to the current guidance,<sup>22</sup> so we feel that the Welsh Government could take this opportunity to make sure that schools and other settings are:*

- *Meeting Welsh Government guidance and standards.*
- *That this is being robustly monitored.*
- *Parents can easily access information on what meals are being given to their children in schools.*

**Q15. Should small and medium out of home businesses be covered by both the calorie labelling and soft drink restriction requirements?**

Yes/No/Not Sure

Yes

Please explain

*A franchise which can include subway, kaspas deserts, burger king, german donner kebab, pieminister are classed as a small business. We therefore would like to ensure that there are no potential loopholes for large franchises operating legally as small businesses.*

*Consistency is also really important for consumers, and there are many small businesses which will primarily sell HFSS foods like bakeries, and independent takeaways that sell pizza and kebabs.*

*We therefore feel that the calorie labelling, and soft drink requirements should be applied consistently to support all consumers in Wales and that the Welsh Government should work with small businesses to ensure they're well supported as the new rules come into force.*

**Q16. Should the following products be exempt from the calorie labelling requirement?**

- menu items for sale for 30 days or less
- items prepacked off premises (which already displayed nutrition information)
- condiments added by the customer
- loose fruit or vegetables
- other

Yes/No/Not sure

Please explain

*We feel that menu items for sale for 30 days or less should not be exempt given that a lot of the out of home sector will change their menu items more frequently than 30 days.*

*We also feel that calories for condiments and loose fruits should be provided on menus. Condiments can be very calorie dense, for example 1 tablespoon of mayonnaise or ranch dressing can add up to 94 calories.*

## Theme 3: Healthier Local Food Environments – Shifting the Balance

**Q17. What support and measures could we put in place to help improve the availability of healthier options within local areas?**

Please explain

**Q18. Should we review existing planning and licensing support, including guidance, to address the distribution of Hot Food Takeaways, particularly close to secondary schools and colleges?**

Yes/No/Don't know

Yes

Please explain

*We want Welsh Government to commit in Healthy Weight: Healthy Wales to strengthening its national planning guidance to explicitly require planners to consider health and wellbeing when reviewing applications. National guidance will enable local authorities to introduce local supplementary planning guidance which requires an assessment of the health and wellbeing impacts of planning applications. We support this with a view to ensuring that no new hot-food takeaways can be set up in areas near schools and where there is excess supply. While not a silver bullet, it will be an important step in tackling the obesogenic environment and ensuring that people can make healthier choices. We would also like to see how licensing powers can be used to support this aim.*

*In 2018, Welsh Government defined a hot food takeaway as an outlet where hot food is sold for consumption off premises, and where there is mixed take-away and restaurant use with drive through facilities.<sup>23</sup> This is in line with how hot food takeaways are defined in England.*

*Hot food takeaways are a growing part of the Welsh food environment, with the number of fast-food outlets having increased 48% from 2010 to 2018 – 670 new establishments.<sup>24</sup> Access to hot food takeaways by secondary school children – especially during school hours - is a problem across Wales. At least three Welsh Public Service Boards (Newport, Torfaen and Vale of Glamorgan) identified hot food takeaways as a factor contributing to childhood obesity in their wellbeing assessments.<sup>25 26 27</sup> Research conducted both UK-wide and for Scotland found that children have very easy access to hot food takeaways and frequently use them to buy food off the school site.<sup>28 29</sup>*

*An evaluation of research on the health impacts of hot-food takeaways near schools identified that “overall the evidence would suggest that increased exposure to outlets selling unhealthy food increases a person’s likelihood of gaining weight”.<sup>30</sup> Similarly, a study of secondary school students in England found a link between the proximity of outlets to schools and unhealthy diets among children.<sup>31</sup>*

*We believe that Welsh Government can learn from case studies in England on the practicalities and impact of introducing national planning guidance. For example, the UK Government updated its National Planning Policy Framework (NPPF) in 2012 to set out how planning can play an important role in creating healthy, inclusive communities.<sup>32</sup> This was followed in 2014 by Planning Practice Guidance (PPG) to provide clarity for English local authorities on how to do this.<sup>33</sup> Newcastle Council later introduced a Supplementary Planning Document in 2016, referencing this guidance and setting several policies to be considered when assessing planning applications for hot food takeaways.<sup>34</sup> This included assessing:*

- *Proximity to secondary schools – where applications would likely be turned down if they were in a location within a 10 minutes’ walk from school (except for where it was in an allocated retail centre).*
- *Over-concentration – where a proposed hot-food takeaway would result in an over-concentration to the “unacceptable detriment” of the vitality of a centre or shopping parade.*
- *Transport hub – e.g., bus stations*
- *Workplaces - A paper by the BMJ shows that the ‘exposure to takeaway food outlets was positively associated with consumption of takeaway food. Among domains at home, at work, and along commuting routes, associations were strongest in work environments.’<sup>35</sup>*
- *Clustering – where two or more hot-food takeaways existed adjacent to one another.*
- *Other factors – residential amenity (unacceptable noise, vibrations, odours, traffic), highway issues, general odour and noise, hours of operation, disposal of waste products.*

*In developing it’s Supplementary Planning Document, Newcastle Council:*

- *Collected food samples from takeaways outlets and tested them for nutritional quality and portion size.*
- *Measured the concentration of hot food takeaway outlets within each ward and measured them using the retail health checks survey.*
- *Reviewed the academic evidence on the link between obesity and exposure to takeaway outlets.*
- *Obtained ward level prevalence of obesity among Year 6 children.<sup>36</sup>*

*Since these measures were introduced, no new planning applications have been approved.<sup>37</sup> An analysis by Newcastle Council on the reasons for this include the impact on residential amenity, over concentration and clustering, the application falling within the exclusion zone of a school, and highway issues.<sup>38</sup> None of the other 40 councils that have implemented similar guidance have yet reported any unintended consequences from making their planning guidance more robust. Please also see the Gateshead Council example.<sup>39</sup>*

*While it is too early to see the overall impact this measure has had on prevalence of obesity and overweight in the city, this example highlights that with the political will, the planning system can support healthier environments near schools in a tangible way.*

## **Respondent information**

**Q19. Are you responding as an individual, or on behalf of an organisation or business? (select only one option)**

- Individual
- On behalf of an organisation
- On behalf of a business
- **Other, please specific**

*This is a response on behalf of the Obesity Alliance Cymru. The OAC is an Alliance of charities, health organisations and Royal Colleges with an interest in preventing and reducing obesity in Wales. Together we are a strong voice with a comprehensive evidence base. Organisations endorsing this Consultation Response are:*

*Cancer Research UK, Royal College of Paediatrics and Child Health, Diabetes UK, British Dietetic Association and dietitians from LHB's, British Medical Association, British Heart Foundation, Royal College of Physicians, Bowel Cancer UK, Tenovus, Welsh NHS Confederation, Chartered Society of Physiotherapy, Royal College of Surgeons of England, Nesta, Royal College of Nursing, Royal College of Occupational Therapists, Royal College of Podiatry.*

**Q20. If answering on behalf of a business, what is the size of the business? (select only one option)**

- Micro business (0-9 employees)
- Small business (10 – 49 employees)
- Medium business (50 – 249 employees)

- Large business (250 employees or more)
- Don't know

## Other potential measures and wider impacts

**Q.21 Please provide details of other options you feel could help drive positive change in the food environment, and support people in Wales to make healthier choices.**

**Are there any other matters you would like to raise?**

*Many of the member organisations of Obesity Alliance Cymru endorsed the recent Welsh NHS Confederation and Royal College of Physicians paper, Mind the gap: What's stopping change? The cost-of-living crisis and the rise in inequalities in Wales. This calls for a cross-government approach to tackling health inequalities by consolidating commitments on inequality in one delivery plan to improve accountability, introducing health impact assessment regulations as a priority, providing more detailed guidance on implementation to local delivery bodies and improving access to prevention programmes, especially for those living in poverty.*

*Wider social determinants of health include access to healthy food and drink: this is why we need to shift the focus from the NHS to addressing factors such as poor housing, transport and food quality. Addressing the factors that cause ill-health in the first place should be a central focus for the Welsh Government. After all, "deprived areas have on average nine times less access to green space, higher concentrations of fast-food outlets and more limited availability of affordable healthy food," The King's Fund. This is why we need to bring all commitments, targets and measures on inequalities and poverty into one overarching delivery plan so that we can ensure that everyone is working to the same end goal.*

## Equality Questions

**Q22. Do you think the proposals in this consultation document might have an effect on the following?**

- Those living in rural areas
- Specific socio-economic groups
- Children and young people
- Equality in relation to;
  - Age
  - Sex
  - Race
  - Religion
  - Sexual orientation
  - Pregnancy and maternity
  - Disability
  - Gender reassignment
  - Marriage/civil partnership
  -

If yes, please explain

**Q23. We would like to know your views on the effects the consultation would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.**

**What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?**

**Q24. Are there any other groups within society not already referenced you think any of the proposals would have an impact on?**

## **Business Support and Impact**

**Q25. What support could be provided to help your business prepare for the following proposals;**

- promotion restrictions (Theme 1- proposals 1 and 2)
- mandatory display of calories (Theme 2-proposal 3)
- place restrictions of the servings of sugary soft drink (Theme 2- proposal 4)
- limits on hot food takeaways near schools and colleges (Theme 3- proposal 6)

**Please Explain**

**Q26. We have calculated illustrative transition costs in both impact assessments. Do these calculations reflect a fair assessment of the costs that would be faced by your organisation/business?**

Yes/No

If no, please provide any further evidence which could be used to improve our estimates. If you are referring to a specific calculation in one of the IAs, please state which one(s).

**Q27. Do you have any further evidence or data you wish to submit for us to consider for our final impact assessment or any specific comments on the methodology or assumptions made?**

Yes/No.

If yes, please provide further evidence which could be used to improve our estimates. If you are referring to a specific IA question or calculation, please state which one(s).

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<sup>1</sup> Public Health England (2016) *Sugar Reduction: The evidence for action. Annexe 4: An analysis of the role of price promotions on the household purchases of food and drinks high in sugar* ([pdf](#))

<sup>2</sup> NHS Health Scotland (2017) Rapid evidence review – restriction of price promotions ([pdf](#))

<sup>3</sup> NHS Health Scotland (2017) Rapid evidence review – restriction of price promotions ([pdf](#))

<sup>4</sup> Food Standards Scotland (2018) *Monitoring retail purchase and price promotions in Scotland (2010 – 2016)* ([pdf](#))



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- <sup>5</sup> Cancer Research UK (2019) Paying the price ([pdf](#))
- <sup>6</sup> Food Standards Scotland (2018) Briefing paper on Discretionary foods ([pdf](#))
- <sup>7</sup> Cairns G. (2015) The impact of food and drink marketing on Scotland's children and young people. The University of Stirling ([pdf](#))
- <sup>8</sup> Cairns G, et al (2012) Systematic reviews of the evidence on the nature, extent and effects of food marketing to children. A retrospective summary. *Appetite*. 62: 209–215 ([website](#))
- <sup>9</sup> Garrido-Morgado A and Gonzalez-Benito O. (2015) Merchandising at the point of sale: differential effect of end of aisle and islands. *BRQ Business Research Quarterly*. 18(1): 57–67 ([website](#))
- <sup>10</sup> Inman JJ and Winer RS. (2008) Where the rubber meets the road: a model for in store consumer decision making. Cambridge MA Marketing Science Institute. 98–122 ([website](#))
- <sup>11</sup> Bezawada R, Balachander S, Kannan PK, Shankar V. (2019) Cross-category effects of aisle and display placements: A spatial modelling approach and insights. *Journal of Marketing*. 73(3): 99–117 ([pdf](#))
- <sup>12</sup> Roeder (2008) L'expérience de consommation: exploration conceptuelle, méthodologique et stratégique, thèse de doctorat. Université de Bourgogne, LEG-CERMAB; 2008. Cited in Bessouh N, Iznasni A and Benhabib A. Factors influencing impulse buying of Algerian shoppers. *International Journal of Science and Research* 2013 ([pdf](#))
- <sup>13</sup> NHS Health Scotland (TBC) Review of evidence in impact of marketing (title TBC) ([pdf](#))
- <sup>14</sup> Ejlerskov KT, Sharp SJ, Stead M, Adamson AJ, White M, Adams J (2018) Supermarket policies on less-healthy food at checkouts: Natural experimental evaluation using interrupted time series analyses of purchases. *PLoS Med* 15(12): e1002712. ([website](#))
- <sup>15</sup> All figures, unless otherwise stated, are from YouGov Plc. Total sample size was 1,077 adults. Fieldwork was undertaken between 29th March - 4th April 2018. The survey was carried out online. The figures have been weighted and are representative of all adults in Wales (aged 18+).
- <sup>16</sup> All figures, unless otherwise stated, are from YouGov Plc. Total sample size was 1,067 adults. Fieldwork was undertaken between 19th - 22nd November 2018. The survey was carried out online. The figures have been weighted and are representative of all GB adults (aged 18+).
- <sup>17</sup> <https://www.chargedetail.co.uk/2022/06/09/over-half-of-uk-consumers-now-purchase-groceries-online/#:~:text=A%20study%20from%20Spryker%20has,UK%20Online%20Grocery%20Report%202022>
- <sup>18</sup> <https://www.nesta.org.uk/report/reordering-food-options-on-delivery-apps-could-help-to-reduce-obesity/>.
- <sup>19</sup> <https://www.sheffield.ac.uk/social-sciences/news/12-million-living-uk-food-deserts-study-shows>
- <sup>20</sup> Diabetes UK (2018) Food Upfront Campaign ([website](#))
- <sup>21</sup> <https://www.cambridge.org/core/journals/public-health-nutrition/article/energy-contribution-of-sugarsweetened-beverage-refills-at-fastfood-restaurants/5A9FFA63C2CBF974F08709F6BFEECB6D>
- <sup>22</sup> <https://business.senedd.wales/documents/s87143/Committee%20Response%20to%20the%20Welsh%20Government%20Consultation%2011%20April%202019.pdf>
- <sup>23</sup> Welsh Government (2018) Consultation Document: Subordinate Legislation Consolidation and Review. Consolidation of the Town and Country Planning (Use Classes) Order 1987 and Town and Country Planning (General Permitted Development) Order 1995 ([pdf](#))
- <sup>24</sup> BBC News (2018) Takeaway Wales: Britain's fast-food capital? ([website](#))
- <sup>25</sup> One Newport PSB (2017) *Newport Community Well-being Profile 2017* ([pdf](#))
- <sup>26</sup> Torfaen Public Services Board (2017) *Torfaen Well-being Assessment* ([pdf](#))
- <sup>27</sup> Vale of Glamorgan Public Services Board (2017) *Vale of Glamorgan Well-being Assessment* ([pdf](#))
- <sup>28</sup> Royal Society of Public Health (2016) *The Child's Obesity Strategy: How our young people would solve the childhood obesity crisis* ([pdf](#))
- <sup>29</sup> Food Standards Scotland (2015) *Food and drink purchasing by secondary school pupils - Beyond the school gate* ([pdf](#))
- <sup>30</sup> Scottish Government (2018) Research project: To explore the relationship between the food environment and the planning system ([pdf](#))
- <sup>31</sup> Smith, D. Cummins, S. Clark, C. Stansfield, S. (2013) "Does the local food environment around schools affect diet? Longitudinal associations in adolescents attending secondary schools in East London" *BMC Public Health* 2013 13:70 ([pdf](#))
- <sup>32</sup> Ministry of Housing, Communities and Local Government (2012) National Planning Policy Framework ([website](#))
- <sup>33</sup> Ministry of Housing, Communities and Local Government (2014) Guidance: Health and wellbeing ([website](#))

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<sup>34</sup> Newcastle City Council (2016) Hot Food Takeaway - Supplementary Planning Document ([pdf](#))

<sup>35</sup> <https://www.bmj.com/content/348/bmj.g1464>.

<sup>36</sup> Public Health England (2017) Case study: planning document to limit the proliferation of takeaways ([website](#))

<sup>37</sup> Public Health England (2018) Public health matters blog: Putting healthier food environments at the heart of planning ([website](#))

<sup>38</sup> Newcastle City Council (2016) Hot Food Takeaway - Supplementary Planning Document ([pdf](#))

<sup>39</sup> <https://www.gateshead.gov.uk/article/3089/Hot-food-takeaway-Supplementary-Planning-Document>