

MAYOR OF LONDON

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A young girl with colorful braids is drinking water from a glass. She is wearing a pink quilted jacket and a blue floral patterned skirt. In the background, another child is eating at a table. The table is covered with a white floral tablecloth and has blue plates of food on it.

# THE LONDON FOOD STRATEGY

REPORT TO THE MAYOR ON CONSULTATION  
ON THE DRAFT LONDON FOOD STRATEGY

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# Executive summary

The London Food Strategy (LFS) is the Mayor’s vision for how to make food better in London for everyone. It is a non-statutory strategy and will replace the London Food Strategy which was published in 2006.

The draft LFS was published on 11 May 2018 for an eight-week public consultation period. As part of the consultation, the Mayor also consulted on a proposed ban on advertising of food and drink that is less healthy across the Transport for London (TfL) estate.

To ensure as many members of the public and stakeholder organisations had the chance to comment, the draft LFS was publicised through:

- A webpage on London.gov.uk;
- The Talk London webpage;
- Twitter;
- Direct emails to stakeholder groups; and
- A range of events and meetings

A large number of responses were received from:

- **stakeholder organisations** via emails, letters and an online webform
- **the public** via emails, focus groups, representative polling, online discussion threads and surveys.

This Consultation Report sets out a detailed summary of the consultation process for the draft LFS. It presents a summary of the consultation responses received in addition to key themes that emerged from the consultation, and the recommended responses to them.

Regarding the draft LFS as a whole, the key themes raised were:

Main theme	Recommended response
Overall support for the six key settings and structure of the draft LFS.	The six key settings and overall structure have remained broadly the same in the final LFS.
The most vulnerable groups need more consideration, particularly the most marginalised in society.	The needs of vulnerable groups are a priority for the strategy and further reference to these groups has been included, as well as a

Main theme	Recommended response
	commitment to measure household food insecurity.
A request for bolder action and for the strategy to go further across all six settings.	<p>Actions have been strengthened throughout the final LFS and additional actions included.</p> <p>However, it should be noted that the Mayor has limited powers in many areas therefore a balance needs to be struck.</p>
Clear indicators, targets and timescales are needed to ensure the strategy is implemented.	<p>An Implementation Plan will be published alongside the final LFS. This will include indicators, targets and milestones.</p> <p>This rolling plan will be reviewed and updated every two years.</p>
Strong support for, and some opposition to, the proposed advertising restrictions on the TfL estate.	A full options analysis of the proposals put forward during the consultation has taken place and the final policy has been amended to respond to some of the concerns raised by industry.
Changes to the obesogenic environment are welcomed by stakeholders.	Support is noted.

The main themes raised under each of the key settings were as follows:

Key setting	Main theme
Good food at home, and reducing food insecurity	The need to focus on marginalised groups
	A stronger focus needed on food poverty and food insecurity
Good food economy, shopping and eating out	Proposed advertising ban
	Food high in fat, sugar and salt

Good food in community settings and public institutions	Healthier Catering Commitment
	Support for public sector staff to eat healthy, sustainable food
	Support for breastfeeding in public institutions and community settings
	Food in the NHS
Good food for pregnancy and childhood	School food
	Early years nutrition
	Infant feeding
	Child obesity
	Healthy Start vouchers
	Proposed restriction on new hot food takeaways
	Oral health
Good food growing, community gardens and urban farming	Specific user groups
	Funding for projects
	Benefits of food growing
	Type of food growing
	Procurement
	Social prescribing
	Protection and provision of food growing spaces
	Food supply and production
	Skills and capacity building
Farming and food supply	

Good food for the environment	Food security and resilience
	Sustainable diets and procurement
	Food waste and redistribution

After considering all comments from the public and stakeholders, the London Food Strategy will be finalised and approved by the Mayor.

The final London Food Strategy will be published on the Mayor of London website, [London.gov.uk](http://London.gov.uk), alongside an Implementation Plan.

# Introduction and background

## Overview of the strategy

The LFS is the Mayor's vision for how to make food better in London for everyone. It is a non-statutory strategy and will replace the current version of the strategy which was published in 2006.

The LFS interlinks with the other Mayoral strategies and visions such as the draft New London Plan, Health Inequalities Strategy, Diversity and Social Inclusion Vision, Economic Development Strategy, London Environment Strategy, Mayor's Transport Strategy, Skills for Londoners Strategy, Tourism Vision and A Vision for London as a 24-Hour City.

As the LFS is non-statutory, there are no specific requirements for what it should contain.

## Strategy structure and aims

The draft LFS contains a vision to provide 'healthy and sustainable food for London'. It is structured under six key settings, each of which has an overarching aim:

- **Good food at home** – help to tackle rising levels of household food insecurity and ensure all Londoners can eat well at home.
- **Good food shopping and eating out** – support good food businesses to improve London's food environment and make healthy, affordable options more widely available to Londoners.
- **Good food in community settings and public institutions** – work with public sector partners to improve their food procurement for the communities they serve.
- **Good food for maternity, early years, education and health** – using good food to help give Londoners the best possible start in life.
- **Good food growing, community gardens and urban farming** – promoting the multiple benefits of food growing for individuals and communities.
- **Good food for the environment** – reducing the environmental impact of our food system by making it more efficient and less wasteful.

Each of the six chapters contains actions under the following headings:

- What the Mayor will do to deliver change
- What the Mayor will do to support change
- Priorities to be led by external partners

Several actions are set out under each of the headings, as well as actions that all Londoners can take to contribute to good food in London.

A key consideration in the draft LFS was the issue of integration, both within the draft strategy itself, and between other Mayoral strategies such as the London Environment Strategy, the draft New London Plan and the Health Inequalities Strategy. The draft final LFS has been updated to ensure it reflects the most recent published versions of other Mayoral Strategies, as well as policy developments that have occurred since the draft LFS was published.

### **Consultation on proposed ban of unhealthy food and drink advertising on Transport for London (TfL) estate**

As part of the consultation on the draft LFS, the Mayor also consulted on a proposed ban on advertising of food and drink that is less healthy across the TfL estate. This consultation was part of the Mayor's commitment to tackle child obesity and was included as an action in Chapter 2 of the draft LFS – Good food shopping and eating out - under 'what the Mayor will do to deliver change'.

The Mayor and the Greater London Authority (GLA) worked closely with TfL throughout the consultation period to ensure key stakeholders were given every opportunity to respond.

### **Purpose of this report**

This Consultation Report sets out a detailed summary of the consultation process for the draft LFS.

It presents a summary of the consultation responses to the draft LFS received by stakeholders and the public. It sets out the overall key themes that emerged from the consultation, as well as an overview of the consultation responses grouped by each of the six key settings, and the recommended responses to them. These include proposed changes and clarifications to the draft LFS, as well as justification when no change is recommended.

The report also recommends proposed changes to the draft LFS because of changes to other Mayoral Strategies or policy developments that have occurred since the draft LFS was published.

This Consultation Report aims to provide a fair and accurate overview so that the Mayor can have proper regard to the consultation responses when deciding whether to approve the draft final LFS.

It should be noted that it is not possible to summarise each individual response in this report or fully reflect all the detail, although each response has been analysed and properly considered. It should also be noted that whilst anyone could submit their views, individuals and organisations with an interest in the subject of food, and the capacity to



respond, were more likely to respond than those that did not. This means that the respondents' views can't be assumed to be the same as the wider population. Therefore, the main purpose of this report is not to determine how many people held particular views, but to present the full range of views that were expressed through the consultation.

# Consultation process

## The draft LFS consultation

The draft LFS was published on the London.gov.uk website on 11 May 2018 for an eight-week public consultation period. It sets out the Mayor's vision to ensure every Londoner has access to healthy, affordable and culturally-appropriate good food regardless of where they live, their personal circumstances or income.

An easy-read version of the draft LFS as well as a background paper on proposals to consult on banning adverts for food and drink that is not healthy on the Transport for London estate were published alongside the draft LFS and formed part of the consultation.

The draft LFS contains four annexes, which form part of the main document:

- Annex 1: Glossary
- Annex 2: Our definition of good food
- Annex 3: Food that is good for people and the planet
- Annex 4: The London Food Board

An Integrated Impact Assessment (IIA) of the draft London Food Strategy was also published for a three-week consultation period on 21<sup>st</sup> June. The IIA looks at how the Mayor's commitments in the draft LFS could affect a range of environmental, social and economic factors.

Given the non-statutory nature of the LFS, there is no requirement to consult on the draft LFS. However, to ensure that all Londoners, stakeholders and others had the opportunity to comment and make recommendations on the strategy the Mayor publicly consulted on the draft LFS for an eight-week period.

A wide range of people responded to the consultation. This included Londoners and those representing charities and NGOs, businesses, membership organisations, professional bodies, local authorities, advertising companies, and healthcare providers. These were split into two main groups; the public, and stakeholders. Stakeholders were:

- People responding on behalf of an organisation
- Individuals with a specific expertise in food (there were only a very small number of these type of respondents)

Members of the public were encouraged to comment on the draft LFS through the Talk London webpage, which was overseen by the GLA's Intelligence team, whilst stakeholders

were encouraged to respond through the online survey on the draft LFS webpage. However, consultees could respond in whatever way they chose, including by email to a dedicated consultation email address or letter directly to the GLA's Food Policy team.

The rest of this chapter sets out the range of consultation approaches used during the eight-week consultation period. These can be divided into:

#### Public engagement with the draft LFS:

- Talk London survey
- Talk London discussions
- Correspondence
- Qualitative research

#### Stakeholder engagement with the draft LFS:

- Digital engagement with stakeholders
- Correspondence with stakeholders
- Events
- Consultation with stakeholders on the proposed advertising ban on the TfL estate.

### **Public engagement with the draft LFS**

#### 1. Talk London survey

People were invited to 'have your say' on the draft LFS across the GLA's digital channels. They were directed towards the draft LFS landing page on London.gov.uk, from where they could proceed to Talk London to complete a survey relating to the ambitions of the strategy. The survey was available for completion between 11 May and 5 July 2018. Respondents were required to sign up to Talk London to take part, though they could request a version of the survey which did not require sign-up.

A total of 1,519 responses were received. It should be noted that this survey's sample has not been weighted, and therefore cannot be said to be representative of the London population.

**Table 2.1** below provides a breakdown of the demographic characteristics of survey respondents. The findings from these surveys have been compared against the findings from representative polling, and key differences between the two surveys are highlighted in the full consultation reports available on London Datastore.

<b>Gender</b>	<b>Age</b>	<b>Ethnicity</b>
<ul style="list-style-type: none"> <li>• Male: 48%</li> <li>• Female: 48%</li> <li>• Other: 1%</li> <li>• No response: 3%</li> </ul>	<ul style="list-style-type: none"> <li>• 18-24: 2%</li> <li>• 25-34: 13%</li> <li>• 35-44: 15%</li> <li>• 45-54: 16%</li> <li>• 55-64: 20%</li> <li>• 65+: 19%</li> <li>• No response/DoB not valid: 15%</li> </ul>	<ul style="list-style-type: none"> <li>• White – 84%</li> <li>• Mixed – 4%</li> <li>• Black – 2%</li> <li>• Asian – 5%</li> <li>• Other: 2%</li> <li>• No response: 3%</li> </ul>
<b>Tenure</b>	<b>Working status</b>	<b>Education</b>
<ul style="list-style-type: none"> <li>• Being bought on a mortgage: 31%</li> <li>• Owned outright: 31%</li> <li>• Private renters: 22%</li> <li>• Housing association tenant: 3%</li> <li>• Local authority tenant: 3%</li> <li>• Other: 7%</li> <li>• No response: 3%</li> </ul>	<p>Working</p> <ul style="list-style-type: none"> <li>• Full time: 55%</li> <li>• Part time: 11%</li> </ul> <p>Not working:</p> <ul style="list-style-type: none"> <li>• Retired: 17%</li> <li>• Caring: 2%</li> <li>• Disabled: 2%</li> <li>• Unemployed: 2%</li> </ul> <p>Student:</p> <ul style="list-style-type: none"> <li>• Part time working: 2%</li> <li>• Not working: 2%</li> </ul> <p>Other: 6%</p> <p>No response: 3%</p>	<ul style="list-style-type: none"> <li>• Degree or higher: 56%</li> <li>• Higher education such as foundation degree or HND: 7%</li> <li>• A levels or equivalent: 6%</li> <li>• GCSE/O Level grade A*-C or equivalent: 4%</li> <li>• Other qualifications: 2%</li> <li>• No qualifications: 1%</li> <li>• No response: 24%</li> </ul>
<b>Religion</b>	<b>Sexuality</b>	<b>Disability</b>
<ul style="list-style-type: none"> <li>• Christian: 21%</li> <li>• Jewish: 1%</li> <li>• Muslim: 1%</li> <li>• Buddhist: 1%</li> <li>• Hindu: 1%</li> <li>• Sikh: 0%</li> <li>• No religion: 36%</li> <li>• Prefer not to say: 5%</li> </ul>	<ul style="list-style-type: none"> <li>• Heterosexual/straight: 60%</li> <li>• Gay, lesbian or bisexual: 6%</li> <li>• Other: 1%</li> <li>• Prefer not to say: 8%</li> <li>• No response: 25%</li> </ul>	<ul style="list-style-type: none"> <li>• No: 54%</li> <li>• Yes: 10%</li> <li>• Prefer not to say: 3%</li> <li>• No response: 34%</li> </ul>

<sup>1</sup> Percentages may not add to 100%, due to rounding

<ul style="list-style-type: none"> <li>• Other: 2%</li> <li>• No response: 32%</li> </ul>		
<b>Parent</b>		
<ul style="list-style-type: none"> <li>• Yes: 12%</li> <li>• No: 60%</li> <li>• Prefer not to say: 20%</li> <li>• No response: 8%</li> </ul>		

2. Talk London discussions

Londoners were also invited to take part in discussion threads on Talk London. There were seven separate discussions, comprising 739 comments, across a variety of topics in the draft LFS. They are:

- [Unhealthy food adverts](#) (93 comments)
- [Choosing what to eat](#) (152 comments)
- [Food waste and recycling](#) (237 comments)
- [Growing your own food](#) (43 comments)
- [A healthy workspace](#) (59 comments)
- [Food choices for children](#) (55 comments)
- [Buying food](#) (100 comments)

Respondents were also able to initiate their own discussions. However, no respondents did so.

**Public digital engagement**

3. Correspondence

The landing page on London.gov.uk identified a route for members of the public to participate (i.e. via Talk London), and a route for stakeholder organisations and their representatives to participate (via email).

Some members of the public provided feedback via the stakeholder email route, or directly to the Mayor via the GLA's Public Liaison Unit. A total of 51 responses were received this way.

Additionally, 510 people submitted a template email response, entitled: 'Destination junk free London'. The email expresses support for the proposed restrictions on junk food advertising on the Transport for London network. A copy of the email template can be found in **Appendix 1**.

A summary report of key points made in this correspondence has been included as part of the public consultation reporting.

### **Talk London website statistics**

The following statistics relate to traffic to the [Talk London Draft London Food Strategy page](#). This is where members of the public were directed to complete surveys and contribute to discussion threads.

Food Consultation Page (Talk London)	1,715 unique page views 3,735 in total
Food survey page (Talk London)	2,841 unique pageviews 8,792 in total
Draft London Food Strategy document (from Talk London)	210 unique clicks 444 in total
<u>E-mails to Talk London members</u>  2 about the survey to everyone 1 about the survey to underrepresented  All members for 3 about discussions	average opening rate 25% opening rate 18% average opening rate 22%
@LDN_talk	24 tweets

3.5k followers	561 average impressions
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#### 4. Research

Quantitative research with a representative sample of Londoners was undertaken via a polling provider (YouGov) to ensure that the London Food Strategy is informed by the views of citizens from all sections of the community. Results are based on online interviews with 1,020 London residents, conducted between 8 and 11 May 2018. Data was weighted to be representative of all Londoners aged 18+. Survey content was similar to the Talk London survey, but focused mainly on the proposed advertising restrictions on junk food adverts on the Transport for London estate.

Data from previous recent representative polling and Talk London consultation activity was also referred to in the development of the strategy and consultation reporting.

##### Qualitative research

In addition to the above, qualitative research was undertaken into the Londoners' attitudes and behaviours towards food purchasing and consumption:

- What motivates Londoners in their food choices, and what the challenges are in feeding themselves and their families
- Perceptions of food options in local area, and impact this has on behaviours
- Working Londoners habits at lunchtime
- Parents' views of fast food outlets near school
- Views on sustainability including perceptions of imported food, and attitudes towards sustainability initiatives such as growing own food.

Four focus groups were undertaken (30 participants in total), with Londoners from lower social economic groups, spread across age, gender, parent status, and different parts of London. The sample for the sessions was organised as follows:

**Table 2.2: Qualitative Research Sample – Londoners’ attitudes and behaviours towards food purchasing and consumption**

<ul style="list-style-type: none"> <li>- Four focus groups (30 participants in total)</li> <li>- All C1C2DE social grade</li> <li>- Spread of age, gender, and outer vs inner London</li> <li>- Minimum 3 BAME participants per group</li> </ul>			
<b>GROUP 1</b>	<b>GROUP 2</b>	<b>GROUP 3</b>	<b>GROUP 4</b>
30-45 years old	30-45 years old	19 to 25 years old	19 to 25 years old
Female	Male	Mixed gender	Mixed gender
Parents of children under 18 years old	Parents of children under 18 years old	No children	No children
Inner London	Outer London	Inner London	Outer London

## Stakeholder engagement with the draft LFS

Engagement with stakeholders was led by the GLA Food Policy team and by TfL, who led on the consultation on the proposed ban on advertising of less healthy food and drink on the TfL network. A range of methods were used to ensure reach was as wide as possible.

### Digital engagement with stakeholders

The draft LFS and supporting documents were hosted on a single page on London.gov.uk.<sup>2</sup> This page provided all the information and links required to read and respond to the draft LFS. Visitors to the web page were asked to ‘respond as an individual’ (directed to the Talk London landing page) or ‘respond as an organisation’ (directed to the stakeholder organisation online survey).

During the consultation period there were a total of 4,943-page views of the draft LFS consultation page, of which 4,130 were unique page views. There was a large spike in page views on the launch date of the draft LFS. 1,310 people who visited the page clicked through to view the draft LFS document.

<sup>2</sup> Mayor of London (2017) Draft London Food Strategy <https://www.london.gov.uk/what-we-do/business-and-economy/food/have-your-say-draft-london-food-strategy>



The following statistics relate to traffic to the [Draft London Food Strategy page](#) on London.gov.uk

Draft London Food Strategy (LGOV)	4,130 unique page views 4,943 in total
Draft London Food Strategy document (LGOV)	1,310 unique clicks 1,646 in total

Marketing	
@MayorofLondon 3.22 million followers	1 tweet 78,932 impressions
Mayor of London Facebook 123k followers	4 posts 14,150 average impressions

### Correspondence with stakeholders

The GLA Food Policy team has a wide network of stakeholders with which it communicates. This includes London Food Board, all London boroughs, the Sustainable Food Cities network (food partnerships in London and across the UK and Ireland), London-based charities and NGOs, public health networks, professional bodies and businesses. Emails were sent out to a total of 177 stakeholders (20 London Food Board members plus 157 additional stakeholders) on three key moments during the consultation period to make them aware of the consultation and to invite them to reply:

Date	Reason	To whom
11 May 2018	To announce the launch of the draft LFS consultation	One email to all London Food Board Members and one to wider stakeholders

7 June 2018	To inform stakeholders that there were four weeks remaining to respond to the draft LFS consultation	One email to wider stakeholders
28 June 2018	To inform stakeholders and London Food Board that there was one week remaining to respond to the draft LFS consultation	One email to all London Food Board Members and one to wider stakeholders

### Events

Officers from the Food Policy team attended a total of 19 events or meetings during the consultation period to present or discuss the draft London Food Strategy. Officers from other teams in the GLA spoke about the draft LFS at a further three events.

Apart from an internal lunchtime event arranged for GLA staff and several Board meetings organised the GLA, no consultation events were hosted by the GLA. Instead, officers attended stakeholder organisations' events and meetings to present the draft LFS. These presentations ranged from 10-minute overviews of the draft LFS to one-hour detailed presentations on the content of the draft LFS.

Events ranged from Board meetings and Food Partnership meetings to conferences and working groups. A summary of meetings attended can be found in **Appendix 2**.

### Consultation on the proposed ban on advertising of less healthy food and drink across the TfL estate

Chapter 2: Good food shopping and eating out in the draft LFS included the following action under 'What the Mayor will do to deliver change':

"As part of his commitment to help tackle child obesity, consult industry and other stakeholders on a ban on advertising of food and drink that is not healthy across the TfL estate (including 'brand only' advertising)".

Alongside the consultation on the wider draft LFS, consultation on the proposed advertising ban was led by TfL. In addition to contacting key industry representatives to inform them of the proposed ban, TfL also held meetings with industry representatives to specifically discuss the proposed ban. In some cases, these meetings were also attended by officers from the GLA or representatives from the Mayor's Office. A summary of these meetings can also be found in **Appendix 2**.

## Summary of stakeholder engagement

The full list of the 149 stakeholder organisations that responded to the strategy can be found in **Appendix 3**. There were two main ways that stakeholder organisations responses were received:

- Online survey submissions via the draft strategy consultation webpage
- other correspondence (such as letters and emails)

### Online survey

The draft LFS webpage directed stakeholder organisations to an online survey to submit their feedback on the draft strategy. The survey contained the consultation questions included on page 7 of the draft LFS and broke these down further into two parts. Appendix 4 provides a list of the questions included in the online survey.

A total of 71 (48 per cent) of the stakeholder organisation responses were received through the online survey.

The remaining 78 (52 per cent) of stakeholder organisations responded either by email or by letter (in almost all cases these were PDFs attached to an email). These were all sent to the dedicated consultation email address – [londonfood@london.gov.uk](mailto:londonfood@london.gov.uk).

### Phase 1 analysis

An independent specialist research consultancy was appointed following a competitive tendering process to code and categorise the stakeholder responses to the consultation. A codebook was developed in collaboration with the GLA Food Policy team. The codebook enabled a quantitative measure of responses.

All online and email/letter responses were coded by chapter within the draft London Food Strategy (e.g. Good Food at Home, Good Food Shopping and Eating Out) and by level of support. The codebook also identified themes mentioned by stakeholders in their responses.

Since the draft London Food Strategy covers several different initiatives and a response could cut across more than one policy area (both within the draft London Food Strategy and/or with other Mayoral strategies), the codebook also identified ‘themes’ in consultation responses. For example, a response to the Good Food at Home chapter that referenced “education should be used to develop healthy eating patterns at home” was coded as responding to Chapters 1 and 4 - the Good Food for Maternity, Early Years, Education and Health chapter, together with the following themes:

- Schools
- Healthy eating

- Education

This approach helped to identify cross-cutting issues of relevance to multiple policy areas.

The level of support for specific chapters and objectives within the draft London Food Strategy was also coded, where support was explicitly expressed in a consultation response. Support was split into three categories: ‘do not support’; ‘support with suggestions’; and ‘support unreservedly’. ‘Support with suggestions’ were expressions of support for the chapter or objective, but where the respondent also provided ideas for further improvement.

All stakeholder responses, regardless of format or delivery method, were coded in this way. This helped to overcome the issue of responses to the consultation questions via the webform not always answering the specific questions asked, whilst retaining the information contained within the responses.

Responses were analysed for the:

- **Level of support** – to identify chapters or objectives with strong support or objections.
- **Issues raised** – this could be through the identification of:
  - perceived gaps in the coverage of the draft London Food Strategy, or
  - the desire for additional, interim or more ambitious targets, or policies
- **Proposed additions and amendments** – these were considered in relation to:
  - whether they are within the scope of the Mayor and GLA to implement or influence,
  - whether the London Food Strategy or the accompanying Implementation Plan are the appropriate place for them (e.g. they might come under the remit of other strategies or plans).

<b>Category</b>	<b>Number of respondents</b>
Charity/non-profit organisation	50
Business/business group	22
Local authority/political organisation	18

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Advertising body/organisation	15
Professional body/institute	7
Healthcare provider/body	6
Educational organisation	3
Community group	2
Other	26
<b>TOTAL</b>	<b>149</b>

# Main issues raised, and proposed strategy changes

This chapter contains a summary of the responses received during the draft LFS consultation and makes recommendations to the Mayor on changes to the draft LFS.

Since it is not possible to include every issue raised as part of the consultation, this report gives a high-level indication of:

- the issues that most consultees commented on;
- issues that were not raised by many consultees, but that may have significant implications for the strategy.

The following sections summarise the main themes raised through the stakeholder and public consultation. The first section looks at general and cross-cutting issues. The subsequent sections summarise the issues raised for each of the six main chapters in the draft LFS. The issues raised in both overall and for each of the six main chapters in the draft LFS.

The tables under each chapter provide summaries of the main issues, the type of stakeholders that raised the issues, the proposed response and the proposed changes where relevant.

<b>Table 3.1 - Key to stakeholder tables</b>	
No change	No change to either the narrative or the actions in the London Food Strategy
Clarification	Change or addition to the narrative in the London Food Strategy
Change	Change to the actions in the London Food Strategy

For the purposes of the consultation, stakeholders have been grouped as follows:

- Charity/non-profit organisation
- Local authority/political body
- Advertising body/organisation
- Professional body/institute
- Healthcare provider/body
- Educational organisation
- Community group
- Other

## **Overview – general and cross cutting issues**

This section contains an overview of the general and cross cutting issues arising from the consultation on the draft LFS from stakeholders. Issues raised in relation to each of the six chapters in the draft LFS are then addressed in turn. Whilst the general and cross cutting issues section contains a summary of the stakeholder responses, the six 'chapter sections' cover both the public and stakeholder responses.

### Summary of responses to consultation questions

Stakeholders were asked five overarching consultation questions on the draft LFS. Not all stakeholders answered the questions, and some only answered some of the questions. Below is a summary of the responses for each of the overarching questions.

#### Question: Are the six priority areas the right ones?

A total of 102 stakeholders answered this question, with 80 per cent answering yes, the priority areas are the right ones. The remaining 20 per cent suggested some additional priority areas, or expressed the view that they did broadly agree, but other priority areas could be added. Of the additional priorities suggested, the most common priority was vulnerable or marginalised groups.

#### Question: Are there other priorities that should be considered?

Of the 94 stakeholders that answered this question, 61 per cent answered yes and 39 per cent answered no. Although many stakeholders answered yes, most suggestions were not for additional chapters, but for additional areas to be covered within the chapters.

#### Question: Are the most effective actions the Mayor, external stakeholders and individuals can take set out?

81 stakeholders answered this question, of which 51 per cent answered yes and 49 per cent answered no. Although overall stakeholders were supportive of the draft LFS and did not generally disagree with the actions included, many want the Mayor to go further. This is the case across all chapters in the strategy.

#### Question: Are there other actions that should be included in the draft LFS?

A total of 112 stakeholders answered this question. A significant majority of 83 per cent answered that yes, other actions should be included in the draft LFS. In line with above, stakeholders requested that across all areas of the strategy that additional and stronger actions are included.

### Question: Is the strategy inclusive?

84 stakeholders responded to this question, with 61 per cent stating that yes, the strategy is inclusive, and 39 per cent answering that no, it is not inclusive. Of those that answered that the strategy is not inclusive, many suggested additional groups that should be considered further in the strategy, including the homeless, older people and those requiring special diets.

Stakeholders were also asked questions on whether they supported the proposed ban on advertising of food and drink that is not healthy across the TfL estate. The answer to this question is covered in the main themes below. Stakeholders were also asked what their organisation is doing to support good food in London and how their organisation could support the Mayor to do more to achieve good food in London. This information has all been collated and will be used to inform implementation of the strategy.

### Key overarching themes

A range of cross cutting or overarching themes emerged from the consultation with stakeholders. These are summarised in **table 3.2** below. Several additional cross cutting themes also emerged. These additional themes are covered in **table 3.3**.



**Table 3.2 – Overarching themes raised by stakeholders in response to the draft LFS**

Main theme	Recommended category of GLA response	Recommended change to strategy
<p><b>Support for the six key settings</b>            Most stakeholders support the six key settings set out in the draft LFS, although some had suggestions for other areas to include or ideas for ways in which the areas of focus could be extended.</p> <p>Stakeholders welcome the fact that the draft LFS is far-reaching and will impact on many aspects of the way in which Londoners interact with food and the wider food supply chain.</p> <p>The stakeholder consultation identified a small number of further overarching themes regarding the draft LFS, particularly around ensuring the needs of the most vulnerable groups are met, and food and the planning system.</p>	<p>No change</p>	<p>The six key settings will remain broadly the same, although some of the titles of these have been changed to ensure they better reflect the content.</p> <p>In many cases the priority areas suggested by stakeholders are reflected within each of the six chapters. The narrative of these chapters and in some cases the actions have been updated to ensure the priority area themes outlined by stakeholders are fully reflected.</p> <p>Several actions in the draft LFS relate to planning and reflect those included in the draft New London Plan. Officers working on the food programme will continue to work closely with the GLA’s Planning Team</p>

<b>Table 3.2 – Overarching themes raised by stakeholders in response to the draft LFS</b>		
<b>Main theme</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
		to ensure food is fully reflected in the implementation of the New London Plan.
<p><b>The most vulnerable groups need more consideration</b></p> <p>Several respondents felt that the draft London Food Strategy could go further in addressing the needs of those who are most marginalised in society, including the homeless, asylum seekers and those with no access to public funds. For some, it is felt that the draft London Food Strategy should consider how those most in need could be supported. They went on to say that those who are experts with ‘lived experience’ i.e. having experienced hardships for themselves, should be recruited to help implement the final London Food Strategy. This could go some way towards ensuring that those most in need get appropriate help.</p>		<p>The needs of vulnerable groups are a priority for the strategy and further reference to and support for these groups have been included throughout the strategy.</p> <p>This includes the inclusion of an additional action to measure Household Food Insecurity in London in Chapter 1 of the final LFS. See Chapter 1 for further detail.</p>
<p><b>A request for bolder action</b></p> <p>The positivity with which the draft LFS is received is reflected in the fact that one of the most consistent messages from stakeholders is that the measures do not go far enough. Many stakeholders stated that they would like the Mayor to take a bolder approach across all six key settings. Linked to this are</p>	Change	Changes have been made throughout the LFS to strengthen it and ensure actions go as far as possible and a number of new actions have been added in the final LFS.

<b>Table 3.2 – Overarching themes raised by stakeholders in response to the draft LFS</b>		
<b>Main theme</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
requests for the Mayor to have stronger methods for enforcement with a suggestion that the Mayor should have more power to compel key stakeholders to act.		However, it should be noted that the Mayor has limited powers in many areas therefore a balance needs to be struck.
<p><b>Provide reassurance around implementation</b></p> <p>A range of stakeholders suggested that without clearly defined metrics to measure the impact and success of the strategy there will be no real accountability. A number of stakeholders recommended an annual publication of results to ensure the continued visibility of the strategy and to maintain impetus for the strategy.</p> <p>The stakeholder consultation also highlighted the need to reassure people around the implementation of the strategy, particularly as much of the success of the plans are dependent on local authorities and other key stakeholder groups.</p>	Clarification	<p>An Implementation Plan will be published alongside the final Food Strategy. It will include indicators, targets and milestones.</p> <p>This rolling plan will be reviewed and updated every two years to reflect the successive and cumulative London-wide activity required to achieve many of the strategy's longer-term objectives.</p>
<p><b>Strong support and some opposition for the proposed advertising restrictions</b></p> <p>The proposed ban on advertising food and drink that is not healthy on the TfL estate received strong support from the majority of stakeholders (68%). Of the 17% opposed to a ban,</p>	Change	Feedback on appropriate use of language and points of accuracy have been taken into account, significant work has been undertaken to explore alternative policy options put forward by industry, and further

<b>Table 3.2 – Overarching themes raised by stakeholders in response to the draft LFS</b>		
<b>Main theme</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
<p>the majority were from the advertising or food and drink industries who has specific concerns about the language used and the scope of the ban.</p> <p>Many stakeholders, both those that support and those that oppose advertising restrictions, would like the Mayor to promote a healthy eating campaign across the TfL network.</p>		<p>clarity on the scope of the policy have been developed.</p>
<p><b>Changes to the obesogenic environment are welcomed</b></p> <p>Stakeholders expressed support for action to help tackle obesity. There is agreement from many that this can be addressed through considering how people are exposed to HFSS foods through a proliferation of hot food takeaways and retailers selling unhealthy options. A cap on planning permission for takeaways and an 400m exclusion zone around schools garnered strong support from stakeholders.</p>	<p>No change</p>	<p>Support is noted.</p>

Table 3.3: Specific general and cross cutting issues raised by stakeholders in response to the draft LFS			
Main issue / suggestion	Stakeholder category	Recommended category of GLA response	Recommended change to strategy
<b>Bolder leadership and action</b>			
One area that a range of stakeholders highlighted as needing to be better reflected in the strategy, either through the inclusion of additional chapters or by being addressed more throughout the strategy is <b>food and planning</b> .	Charity/non-profit organisation Local Authority Business/ business group	Clarification	Several actions in the draft LFS relate to planning and reflect those included in the draft New London Plan. Officers working on the food programme will continue to work closely with the GLA's Planning Team to ensure food is fully reflected in the implementation of the New London Plan.
Several stakeholders queried the amount of <b>funding and resources</b> available to deliver the actions the Mayor will deliver and support London Food Strategy and requested that more dedicated resource is made available.	Local authority Charity/non-profit organisation	No Change	The GLA has a small team working solely on food policy, along with budget to deliver a range of projects and programmes. This team works closely with London Food Board, other teams within the GLA and external partners to maximise its impact and will continue to do so.
Each chapter includes priorities to be led by external partners. A number of stakeholders raised concerns about the <b>resources available to</b>	Local Authority Health organisation	No Change	The LFS contains a number of actions for the Mayor to deliver and to

<b>Table 3.3: Specific general and cross cutting issues raised by stakeholders in response to the draft LFS</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
<b>external parties</b> to deliver the actions in the strategy, particularly when local authority budgets are diminishing.	Charity/non-profit organisation		support, as well as actions to be led by external parties.  It is recognised that local authorities and other partners face increasing pressure on resources. Although additional funding cannot be provided to fund these actions, the Mayor will support them as far as possible, for example through convening and sharing best practice.
Stakeholders raised the importance of the need for the London Food Strategy to <b>clearly and explicitly link to other Mayoral Strategies</b> .	Charity/not- for profit Local authority	Change	The LFS links to a number of other Mayoral Strategies. This has been made clearer through inclusion of text in the additional 'Background' section in the final LFS and through references throughout the strategy.
<b>Accessibility of the strategy</b>			
A range of stakeholders commented on the ' <b>What can you do</b> ' boxes in each of the six chapters.	Food partnerships Local authorities	Clarification	An additional 'Background' section has been included at the beginning of the document, which includes an

<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
Clarity is needed on to whom 'you' refers and in some cases they are too complex.	Charity/non-profit organisation		<p>explanation that 'you' refers to individual Londoners.</p> <p>The 'what can you do' boxes have been reviewed and several changes suggested to ensure these are helpful.</p>
A number of stakeholders stated that it will be important to consider the needs of different <b>cultures and communities</b> when implementing the strategy as each will need different approaches, and that different cultures will view food and what constitutes a healthy weight differently.	Food partnership Local authority		<p>The Integrated Impact Assessment of the draft LFS assessed its impact on a range of groups with protected characteristics. The IIA concluded that in most cases the draft LFS would have a positive or significant impact on these groups, and in the remaining cases a neutral effect.</p> <p>The LFS aims to be as inclusive as possible, as will the Implementation Plan. It is recognised that different cultures and communities will respond to different approaches and every</p>

Main issue / suggestion	Stakeholder category	Recommended category of GLA response	Recommended change to strategy
			effort will be made to ensure the needs of all Londoners are considered when implementing the actions in the LFS.
<p>Some stakeholders expressed the view that the Strategy could be made <b>more accessible</b>, for example through producing separate web-based publications to support the strategy, through visual representations and top ten tips, as well as ensuring the strategy is communicated through a wide range of channels when it is launched.</p> <p>Stakeholders raised that individual Londoners are unlikely to read the document and it would perhaps be more helpful to produce an accompanying simplified web-based guide for individual Londoners.</p> <p>Language barriers were also highlighted</p>	<p>London Assembly Local Authority Charity/non-profit organisation Consultant</p>		<p>A supporting ‘top tips’ document will be produced and made available on the LFS page of London.gov.uk aimed at individuals.</p> <p>The launch of the final strategy will be communicated through a wide range of channels including online, twitter, Facebook and through a press release.</p> <p>An Easy read version of the final strategy will be made available online and a summary of the final strategy will be made available in different languages on request.</p>



<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
A small number of stakeholders believe that the strategy does not reflect the needs of those requiring special diets for health reasons, such as Coeliac disease	Charity/non-profit organisation	Change	The definition of Good Food in Annex 2 has been updated to reference those requiring special diets. It has also been moved to the front of the LFS and turned into an infographic to make it clearer.
A small number of stakeholders raised the need to reference the <b>Eatwell guidance</b> more in the final strategy.	Charity/non-profit organisation Local Authority	Clarification	References to the Eatwell guidance are included in the London Food Strategy, including Annex 2.
A number of stakeholders suggested that to make the final strategy more inclusive, those with ' <b>lived experience</b> ' should be involved in its design and delivery.	Food partnership Charity/non-profit organisation		The GLA ran four focus groups as part of the consultation on the draft LFS to ensure those with 'lived experience' had a chance to comment on the strategy.  Efforts will be made to involve those with 'lived experience' in the delivery of the London Food Strategy. For example, the London Child Obesity Taskforce will work alongside and

Table 3.3: Specific general and cross cutting issues raised by stakeholders in response to the draft LFS			
Main issue / suggestion	Stakeholder category	Recommended category of GLA response	Recommended change to strategy
			seek the views of children in all aspects of their work.
Several stakeholders raised that many actions are relevant to <b>more than one of the six key settings</b> and suggested repeating or cross-referencing actions in multiple chapters of the London Food Strategy.	Charity/non-profit organisation Business Local authority Food partnership	Clarification	It is recognised that many of the actions are relevant to multiple settings in the LFS. However, to avoid repetition actions have not been included more than once.  A background section has been added to the document explaining that the strategy should be read as a whole and that many actions cross more than one setting.
<b>Annexes</b>			
Most stakeholders commenting on the annexes focussed on the <b>Definition of Good Food</b> in Annex 2. Various comments on good food were received including: <ul style="list-style-type: none"> <li>Stakeholders asking what the definition of good food is</li> </ul>	Business Local authority Charity/non-profit organisation Food partnership	Clarification	The Annexes have been more clearly referred to in the main body of the strategy, including in the background section at the front of the document.  The Definition of Good Food in Annex 2 has been updated to provide greater

<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
<ul style="list-style-type: none"> <li>Stakeholders requesting additions to the Definition of Good Food, particularly regarding animal welfare standards</li> <li>The need to more clearly link the definition of good food to the main body of the Strategy</li> </ul>	Educational establishment		clarity. It has also been moved to the front of the LFS and turned into an infographic to make it clearer.
A small number of comments were received in relation to Annex 3 – <b>Food that is good for people and the planet</b> . These focussed on the specific wording in relation to fish and animal welfare.	Charity/non-profit organisation	Clarification	Annex 3 – Food that is good for people and the planet – has been updated to reflect these comments.

## Chapter 1 - Good Food at Home, and Reducing Food Insecurity

### Who responded

A wide range of stakeholders responded in relation to Chapter 1: Good Food at Home, and Reducing Food Insecurity. Of those that responded, the top three categories of respondents were as follows:

**Table 3.4: Top three respondent groups for Chapter 1: Good Food at Home, and Reducing Food Insecurity**

Category	Number of respondents
Charity/non-profit organisation	29
Local authority/political body	19
Business/business group	11

### Main themes

The four main themes that stakeholders raised in relation to Chapter 1 are set out in the table below.

**Table 3.5: Top five themes raised as part of stakeholder responses to Chapter 1: Good Food at Home, and Reducing Food Insecurity**

Theme	Number of responses
Food poverty/insecurity	50
Older people & barriers to accessing good food	24
Best practice: existing projects redistributing surplus food	23
Food banks	21

### Summary of public consultation

Summary of quantitative findings

**Table 3.6: Talk London survey findings (non-representative) on Chapter 1: Good Food at Home, and Reducing Food Insecurity**

- 46% of Talk London respondents eat ready meals, pre-packaged meals or takeaways at least once a week.
- 'Food that is healthy' is the most important consideration when deciding which food to buy, followed by 'how much the food costs.'

## Summary of qualitative findings

### Food at home

Many focus group participants see cooking as a chore and lack the time to cook good meals, especially if they work long hours or have children. They prioritise meals that are quick, easy, and convenient. A couple of Talk London respondents think it is only easy to eat healthy if a partner is at home to cook for them.

Younger male participants find cooking too much of a hassle and often eat fast food or takeaway. Reasons for this include cheap price and convenience of fast food, and lack of inspiration and skills for preparing food and cooking at home.

Many participants have go-to meals that they eat as a matter of routine, which results in a lack of variety in the food and meal choices. Meals often involve ready-meals, prepared food, or frozen oven food, with few regularly cooking from scratch. The main exception was those brought up with a strong food and cooking culture at home, e.g. BAME women. Female participants are responsible for the majority of food shopping, food budgeting and cooking in their household.

A key challenge for parents (reported primarily from female participants) is cooking meals that the whole family will eat, due to different tastes and dietary restrictions among family members. Some said they have to cook multiple meals for family members, but these are often simple meals, ready meals, or oven food as they don't have the time to make something better for each person. As a result, the nutritional value and quality are compromised. The priority among parents is to ensure all the family are fed, more-so than serving healthy and nutritious food.

### Cost and availability of good food

Focus groups revealed that cost is one of the most important factors when buying food and a barrier to eating healthy. There was agreement that eating healthy is more expensive, with a big difference between the price of healthy vs. less healthy food, especially fresh fruit, veg and fish. Participants want there to be more affordable healthy food options for Londoners, including healthy fast food. This was also shared by many Talk London respondents.

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“The prices are always going up, especially for fresh food. The healthiest seems to cost more, I find.” [Focus group participant]

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Others believed it is possible to eat cheap healthy food, though this requires more motivation and time for preparation and cooking.

Younger participants in particular appeared more price-sensitive, whereas more of the older participants parents appeared to be more willing to pay for better quality (and sometimes healthier) food e.g. organic chicken vs. chicken ‘filled with water’.

Many participants try to cut down on food costs through a variety of measures including meal planning, buying frozen food, looking out for offers, buying in bulk, doing large (weekly/ fortnightly) shops, or avoiding supermarkets and buying cheaper items from markets, butchers or grocers. However, there are barriers to these including time and convenience and practical barriers (e.g. not having a car, freezer, or storage space at home).

#### Summary of stakeholder consultation

**Table 3.7** summarises the key themes from the stakeholder consultation in relation to Chapter 1: Good Food at Home, and Reducing Food Insecurity, along with the GLA’s recommended response.

<b>Table 3.7: Issues raised by stakeholders in response to Chapter 1: Good Food at Home, and Reducing Food Insecurity</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
<b>General</b>			
Some stakeholders thought that the <b>title of chapter 1</b> in the draft LFS (Good Food at Home) does not reflect its current (or potentially its redrafted) contents or priorities very well, as the focus of the chapter is on food insecurity.	Local authority/political body Charity/non-profit organisation  Other	Clarification	The title of Chapter 1 has been changed so that food insecurity is more prominent.  It is now entitled ‘Good Food at Home – and Reducing Food Insecurity’.
One stakeholder stated that <b>funding for food education/practical cookery classes</b> is needed to encourage radical behaviour change amongst Londoners.	Charity/non- profit organisation	No change	Prominence is given to the importance of food education and skills which people can use at home, emphasising it is possible to eat healthily on low budget and the role of cooking and food growing as way to increase community resilience.
Many stakeholders stated the strategy should commit to exploring sustainable, long-term solutions to <b>holiday hunger</b> in	Local authority/political body	No change	Holiday hunger is mentioned where relevant throughout strategy.

**Table 3.7: Issues raised by stakeholders in response to Chapter 1: Good Food at Home, and Reducing Food Insecurity**

Main issue / suggestion	Stakeholder category	Recommended category of GLA response	Recommended change to strategy
London, and that this may be an appropriate use of the emerging Mayor's Social Fund.			
One stakeholder stated that the <b>language in this section needs to be reconsidered:</b> London Local Authorities are well placed to understand the factors creating food insecurity, especially within their own areas, and are in need of support and resources, not better understanding. The stakeholder requested that the strategy emphasises implementation, with a stronger focus on action, rather than raising awareness.	Local authority/political body	Change	Language changed to emphasise the importance of implementation, not awareness raising for boroughs who are already fully aware – deleted the need for boroughs to “understand”, as had been in the draft.
Many families lack basic skills in cooking their own food, leading to them becoming reliant on	Charities, NGOs	No change.	We agree with the points raised here. Importance of skills is sufficiently



**Table 3.7: Issues raised by stakeholders in response to Chapter 1: Good Food at Home, and Reducing Food Insecurity**

Main issue / suggestion	Stakeholder category	Recommended category of GLA response	Recommended change to strategy
<p>commercial food, likely to cost more than home-cooked food and may be unhealthy. Having food banks is obviously crucial in food poverty, but do not teach skills that families need. So, the strategy must also address that issue. There also needs to be consistent teaching in all secondary and even primary schools to give children these skills in choosing food and cooking at an early age</p>			<p>raised in the Strategy and will be focussed upon in implementation.</p>
<p>One stakeholder welcomed the action in Chapter 1 of the draft LFS relating to the need to pay Londoners more (e.g. via the <b>London Living Wage</b>)</p> <p>of the stakeholder also mentioned welfare reform impacts</p>	<p>Charity/non-profit organisation</p>	<p>Change</p>	<p>Added “In areas of London where Universal Credit has been fully introduced, there has been a 17 per cent increase in referrals for emergency food with single people, couples and families most affected. This is more than twice the national average, which stands at seven per cent. Long waiting periods for the first</p>

**Table 3.7: Issues raised by stakeholders in response to Chapter 1: Good Food at Home, and Reducing Food Insecurity**

Main issue / suggestion	Stakeholder category	Recommended category of GLA response	Recommended change to strategy
			Universal Credit payment (six weeks and more) can lead to food bank referrals, debt, mental health issues, rent arrears and eviction.
One stakeholder suggested adding a new bullet to highlight the <b>need for businesses to understand how their employment terms affect employees' food lives.</b>	Charity	Change	<p>Two additional actions have been added under 'Priorities to be led by external partners':</p> <p>'Businesses should take steps to understand how pay, employment conditions, job security and working practices can improve the household food security and health of their employees.'</p> <p>and</p> <p>'Businesses should consider paying the London Living Wage, offering flexible working arrangements for people with families and those caring for older or disabled family members,</p>

<b>Table 3.7: Issues raised by stakeholders in response to Chapter 1: Good Food at Home, and Reducing Food Insecurity</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
			and improving contracts and job security.'
Stakeholders recommended that the wording under 'what you can do' relating to <b>reducing meat consumption</b> ' is changed to make it more palatable	Charity/non-profit organisation	Change	The action under 'what you can do' has been updated to read 'For improved health and reduced environmental damage, consider reducing your consumption of meat and eat more fruit and more vegetable-based meals'
One stakeholder recommended that the GLA should be encouraging <b>developments' likely impacts on healthy diets</b> '. This includes new homes with sufficient space for cooking and family dining. The stakeholder suggested that assessments could also favour growing space and additional healthy retail units.	Local authority/political body	No change	

<b>Table 3.7: Issues raised by stakeholders in response to Chapter 1: Good Food at Home, and Reducing Food Insecurity</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
<b>Need to focus on needs of marginalised groups</b>			
One stakeholder stated that given the racial/ethnic diversity of London, a <b>Health Equity lens</b> should be applied to help meet needs of high-needs groups and proportionately meet the needs of ALL Londoners' food security.	Other	No change	Not added as IIA and additional text in LFS mean that different groups' needs are taken account of.
Many stakeholders said there should be <b>more explicit focus on the food needs of the most marginalised groups</b> including older people, homeless, disabled, asylums seekers, unemployed, teens, young adults including those without children – there should be targeted interventions to make healthy food cheaper and more accessible	Local authority/political body  Non-profit organisation	Clarification	Further actions have been added in the final LFS, and existing actions have been strengthened to ensure vulnerable people are supported as far as possible. This includes highlighting the fact that visible food insecurity can make young people vulnerable to exploitation.  In the actions the Mayor will take to deliver change (chapter 1), the first-ever research on London Household Food Insecurity has already

**Table 3.7: Issues raised by stakeholders in response to Chapter 1: Good Food at Home, and Reducing Food Insecurity**

Main issue / suggestion	Stakeholder category	Recommended category of GLA response	Recommended change to strategy
			<p>commenced following the end of the consultation on the draft LFS, and will deliver its findings in early 2019.</p> <p>In the actions the Mayor will take to support change, an action has been added in chapter 1 that the Mayor will work with partners to help prioritise and join up action to reduce food insecurity and hunger, including piloting work with schools to tackle child poverty.</p> <p>The introductory narrative to Chapter 1: Good food at home has been strengthened to include reference to London's more vulnerable groups.</p> <p>The narrative has changed to acknowledge the particular food insecurity challenges which may be faced by marginalised groups such as older people, homeless people, disabled people, asylum seekers,</p>

<b>Table 3.7: Issues raised by stakeholders in response to Chapter 1: Good Food at Home, and Reducing Food Insecurity</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
			<p>unemployed people, teenagers and young adults. The narrative notes that for all these groups, and others, food plays a vital role in avoiding isolation and building communities.</p> <p>The narrative has also been expanded to emphasise that physical (geographic/spatial) access to good food is also critical to help address food insecurity, emphasising the importance of meals provided in community settings and public institutions, who often cater for vulnerable population groups.</p>
A number of stakeholders asked how the London Food Strategy can highlight the issue that <b>older and vulnerable people</b> living at home should have access to a healthy and affordable food through <b>supported meal</b>	Local authority/political body	Clarification	The introductory narrative to chapter 1 has been strengthened to emphasise how Councils could be supported to look at social and wellbeing promoting alternatives to the meals on wheels services that have in many places

<b>Table 3.7: Issues raised by stakeholders in response to Chapter 1: Good Food at Home, and Reducing Food Insecurity</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
<p><b>services.</b> They questioned how the Mayor could champion areas where change could be levered such as Meals on Wheels for vulnerable adults. Stakeholders thought that leadership could rally this sector to make more efficient use of council budgets and relieve the burden of malnutrition and social isolation on the NHS, with better coordination and collaboration between London boroughs and a focus on the potential role for social enterprises.</p>			<p>been decommissioned due to financial restraints.</p>
<p>One stakeholder stated that ensuring <b>physical</b> as well as <b>financial access to good food</b> is critical to address food insecurity, so it is important to emphasise the links to chapters 2, as are meals</p>	<p>Local authority/political body</p>	<p>Clarification</p>	<p>The introductory narrative to Chapter 1 has been updated to include the following:</p> <p>‘Ensuring physical as well as financial access to good food is also critical to help address food insecurity, which is</p>

<b>Table 3.7: Issues raised by stakeholders in response to Chapter 1: Good Food at Home, and Reducing Food Insecurity</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
provided in community settings, and public institutions (chapter 3).			why this chapter links into Chapter 2, and Chapter 3, emphasising the importance of meals provided in community settings and public institutions.'
One stakeholder thought that the action relating to <b>schools identifying and supporting children and families living with food poverty</b> under 'priorities to be led by external partners' was too vague and made suggestions for amendments to make it more specific.	Local authority	Change	Additional wording has been added to this action (action 7 under 'Priorities to be led by external partners) in order to make it more specific:  'this could be via cooking classes with parents, identifying children who may need support for holiday hunger projects, schemes to share unused food from school meals with families, delivering education about food waste and best before and use by dates, review of food technology offer in secondary schools.



**Table 3.7: Issues raised by stakeholders in response to Chapter 1: Good Food at Home, and Reducing Food Insecurity**

Main issue / suggestion	Stakeholder category	Recommended category of GLA response	Recommended change to strategy
A range of stakeholders recommended that the focus on the <b>food needs of older people</b> should be increased in the LFS.	Local authority/political body  Charity/non-profit organisation	Clarification	The emphasis on older people has been increased through adding wording in the introductory narrative to chapter 1.
Several stakeholders suggested that <b>community food hubs</b> need to be included in the LFS – and that each borough should have at least one community food hub based at an existing community centre / school / Children’s centre (ideally one per key areas of deprivation).  Suggestions for what these could include were a community café /kitchen/community meal area where programmes such as cookery clubs, holiday meals,	Local authority/political body  Charity/non-profit organisation	Change	An additional action has been added under ‘Priorities to be led by external partners’ which states that every London borough should have a community food hub. to emphasise the potential role of community food hubs in achieving multiple LFS aspirations.

<b>Table 3.7: Issues raised by stakeholders in response to Chapter 1: Good Food at Home, and Reducing Food Insecurity</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
<p>lunch clubs and FareShare pantries could be accommodated.</p> <p>Stakeholders stated that community food hubs can increase knowledge and skills as well as supporting and serving disadvantaged communities.</p>			
<b>Food poverty should be given stronger focus and higher priority</b>			
<p>A range of stakeholders recommended that the LFS should make a clear statement that <b>diverting food surplus to people in need is not the solution to food poverty</b>. They stated that the LFS should take stand against the institutionalisation of food waste being used to delay or avoid</p>	<p>Charity/non-profit organisation</p> <p>Local authority/political body</p>	<p>Clarification</p>	<p>The introductory narrative to chapter 1 has been updated to ensure that this point is adequately made</p>

<b>Table 3.7: Issues raised by stakeholders in response to Chapter 1: Good Food at Home, and Reducing Food Insecurity</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
action to address the root causes of food poverty.			
One stakeholder recommended the use of <b>Food Partnerships</b> and other respected nodes as additional routes through which grants can be distributed locally.	Local authority	Change	Action 1 under 'What the Mayor will do to deliver change' has been updated to highlight the potential role of borough-based Food Partnerships in supporting Food Poverty Action Plans.
A small number of stakeholders thought that the final LFS should retain the aim for <b>London to become a zero-hunger city</b> , as set out in the previous London Food Strategy that was published in 2006.	Local authority/political body	Clarification	Additional reference to the ongoing aim to make London a zero-hunger city has been added to the narrative to Chapter 1.

## Chapter 2: Good Food Economy, Shopping and Eating Out

### Who responded

Of all the chapters in the draft LFS, chapter 2 received the highest number of comments. Many of these comments related to the proposed advertising restrictions on the TfL estate, although a large number were also received on other areas of the chapter. Of those that responded, the top three categories of respondents were as follows:

**Table 3.7: Top three categories of respondents to Chapter 2: Good Food Economy, Shopping and Eating out**

Category	Number of respondents
Charity/non-profit organisation	39
Business/business group	23
Advertising agency/body	16

### Main themes

The main themes that stakeholders raised in relation to Chapter 2 are set out below:

**Table 3.8: Top five themes raised as part of stakeholder responses to Chapter 2: Good Food Economy, Shopping and Eating Out**

Theme	Number of responses
The proposed junk food advertising restrictions	58
Food businesses need to do more to encourage healthy options and to consider procurement; buy more locally and think about provenance of food	34
Best practice: cap on planning permission, exclusion zones round schools	26
Retail: reduce the number of retailers selling unhealthy goods at low cost/promotions	25
Child obesity	21

### Summary of public consultation

Summary of quantitative findings

**Table 3.9: Talk London survey findings (non-representative) on food at home and eating out**

Talk London respondents think that cheaper healthy food options on London's high streets will have the greatest impact on improving healthy eating in London.

## Summary of qualitative findings

### Food shopping

Most focus group participants said they buy their food from wherever is closest (to home or on the way home), which for many is a convenience store which can have a limited selection of healthy and fresh food. Participants acknowledge that supermarkets have a greater selection and think they can also be cheaper than shopping at convenience stores but use of supermarkets is limited to those participants who live close to one or have a car.

Some prefer buying their food from local markets, greengrocers, fishmonger or butchers, with the benefits being that food is better quality and, in some cases, cheaper. Many would like to be able to shop more at these places, but lack of time and busy daily routine means these are not convenient as the preference is to do all the shopping at one place. In the case of greengrocers, some think there has been a decline in the number of these which means they are no longer an option for them. Talk London respondents also talked about shopping at greengrocers and said that some of those that have remained near them have had to increase their prices to compete with supermarkets and are now too expensive.

Some focus group participants had tried online food shopping for convenience, but a few have stopped this as items are not as fresh (e.g. given items that are close to use-by dates) and this method of shopping is less reliable (e.g. late deliveries or items being substituted).

### Access to bad food

Although some focus group participants said that it can be harder to access healthy food, most think it is accessible near them – participants do not think they are necessarily living in 'food deserts'. Some respondents went as far to say there is lots of healthy food near them and that it is easier to find good food in London than other parts of the country.

A key insight from the focus groups was that the main issue isn't that it is too hard to access good food – it is that it is too easy to access bad food. Many participants think there is an abundance of convenient and cheap fast food in shops and on high streets, and that the biggest challenge is overcoming the bad food before getting to the good food. Some attributed this to the decline in greengrocers and growth of

convenience stores meaning that most people shop where there is some healthy food but also plenty of bad food.

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“If only there was more quick ways to get healthy food. I feel like there's so many options for bad food, but no healthy fast food.” [Focus group participant]

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### Eating in the workplace

Most focus group participants reported that lunch is a less healthy meal for them. Some participants bring in food from home (which is usually healthier and cheaper) but most buy food out during the work day. As many said they have short lunch breaks or must eat their lunch on-the-go, the priority here is a quick and cheap lunch which is often fast food or sandwiches. Some said they often buy meal deals as they are good value for money, but they also include an unhealthy snack and drink.

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“When I bring my own food, I think it's healthy because it's cooked food from the night before. Other than that, I get a sandwich but if I get a sandwich I'll have crisps and probably a fizzy drink or sugary drink, so I know that it's not great.” [Focus group participant]

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### Eating out

Most focus group participants reported that it is harder to eat healthy when they are out compared to when they are at home. Although there is a lot of variety in terms of cuisines, there are few affordable healthy places to eat out. Many participants are instead limited to fast food as this is usually the only affordable and most dominant option near to where they live. These views were raised by many Talk London respondents as well.

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“If you're out and you're hungry, you're like, what am I going to eat that's healthy?” [Focus group participant]

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Many participants try to eat healthy at home during the week (Monday to Thursday), and then indulge on the weekend as a treat (for themselves or family) or to meet friends. Some of these participants said they are therefore influenced or constrained by what their families or friends want. Eating out is particularly expensive for families, so participants with children said they often choose places that are cheap or have deals for children. Participants who said they eat out with friend like going to places

that are lively. In both cases, participants reported that they are usually restricted to less healthy food.

### **Proposed restrictions on advertising of food and drink that is not healthy on the TfL estate**

This section summarises findings in relation to the proposed restrictions on junk food advertising on the Transport for London estate.

#### **Summary of quantitative findings**

There is majority support among a representative sample of the population. 52% of Londoners support a ban on all adverts for unhealthy food and drink on the TfL estate. 20% oppose a ban and 29% are undecided.

Highest support comes from older Londoners (60% for those over 60, 64% for those who are retired) and those without children (56%). Remain voters prefer this ban to leave voters, although leave voters do still support overall (42% support to 26% oppose).

Men are slightly more likely to oppose and those under 25 are much more likely to say that they don't know. Tube and bus commuters support this policy as much as all Londoners, and those without children under 18 are slightly more supportive (56%, compared to 52% of all Londoners).

#### **Table 3.10: Comparison between Talk London respondents and representative polling: Ban on advertising unhealthy food and drink on the TfL estate**

- Talk London respondents are more supportive of the ban compared to the representative sample of Londoners.
  - 82% in support vs 52% among the representative sample.
  - 9% oppose, compared to 20% of the representative sample.
  - 9% are undecided, compared to 29% among the representative sample.

#### **Summary of views based on qualitative research**

Despite overwhelming support for a ban from the quantitative research, focus groups revealed mixed views of the effectiveness of banning advertising of unhealthy food and drink, whether on the Transport for London network or other settings (e.g. sponsorship of events).

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“At the end of the day, people are still going to go to McDonalds whether they see it on TV or not.” [Focus group participant]

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Talk London respondents were more optimistic towards the ban, noting that advertising must influence eating behaviours if food companies are willing to spend so much money on it.

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“It's a good idea and one that I wholeheartedly support. I get pressure from my children, to buy unhealthy food that they have seen advertised on children's channels, so I don't think that it is unreasonable to assume that they are influenced by advertising at tube stations and on buses.” [Talk London respondent]

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Despite broad anti-food industry sentiment and concerns about the intentions of companies selling and advertising unhealthy food and drink, some participants did however believe that such businesses play an important role in supporting grassroots sport, particularly through sponsorship or other funding. They implied that banning unhealthy food and drink advertising could therefore have adverse impacts on healthy lifestyles.

### **Emails relating to the proposed restrictions on junk food advertising**

A total of 592 emails and letters were received by members of the public relating to the proposed ban on advertising junk food on the TfL estate, of which 98 per cent were supportive of a ban.

510 of these were emails were entitled ‘Destination Junk Free London’ and used a template provided as part of an online campaign to support a ban. The email template can be found in **Appendix 1**.

### Summary of stakeholder consultation

**Table 3.11** summarises the key themes from the stakeholder consultation in relation to Chapter 2: Good Food Economy, Shopping and Eating Out, along with the GLA’s recommended response.



Table 3.11: Issues raised by stakeholders in response to Chapter 2: Good Food Economy, Shopping and Eating Out			
Main issue / suggestion	Stakeholder category	Recommended category of GLA response	Recommended change to strategy
<b>General</b>			
One stakeholder suggested that the <b>title of Chapter 2</b> should be renamed ‘Good food economy - shopping, eating out and healthy access for all’ as problems of diet related ill health and food poverty will not be solved unless it becomes profitable to make healthy and affordable food accessible to all.	Charity/non-profit organisation	Clarification	of the title of Chapter1 has been changed to “Good food economy - shopping, eating out and healthy access for all” to reflect the centrality of the economy and business to this chapter.
A range of stakeholders recommended that more <b>distribution hubs</b> are needed to strengthen local supply chains and support innovative retail models.	Charity/non-profit organisation	No change	Not clear who would be involved in an initiative of this kind.
Stakeholders advised cross-referencing the need to promote the <b>London Living Wage</b> with all type of business.	Local authority/political body  Charity/non-profit organisation	No change Clarification	LLW is adequately cross-referenced
<b>Working with business</b>			

Table 3.11: Issues raised by stakeholders in response to Chapter 2: Good Food Economy, Shopping and Eating Out			
Main issue / suggestion	Stakeholder category	Recommended category of GLA response	Recommended change to strategy
One stakeholder advised deleting reference to the Chartered Institute of Environmental Health (CIEH) in the action referring to the Healthier Catering Commitment as they are no longer involved in running this initiative.	Professional body/institute	Clarification	Reference to CIEH has been deleted in action 1 under ‘[What the Mayor will do to support change.]’
One stakeholder highlighted that Sugar Smart has been a successful initiative for making healthier choices more accessible, however sugar shouldn’t be singled out as the dietary issue of concern, <b>high intakes of saturated fat and salt and lack of fibre also need addressing</b> . The stakeholder stated that if London was ‘Food Smart’ and its boroughs took on this initiative, e.g. combining and building on the Healthier Catering Commitment and Sugar Smart, this would support the Mayor’s aims to be a world-renowned food location.	Local authority	No change	
One stakeholder recommended that under the “What you can do” section a suggestion should be added to <b>support local shops, vegetable box schemes and farmers’ markets</b> .	NGO	Change	Action 1 under ‘What you can do’ has been updated to include reference to supporting local shops, fruit and

<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
			vegetable box schemes and using street and farmers' markets more.

Of the 149 responses from stakeholder organisations, with 68% (101) were in favour of an advertising ban, 17% (26) opposed and 15% (22) not expressing a view on this element of the draft LFS.

**Table 3.12** summarises the key themes from the stakeholder consultation in relation to the proposed advertising restrictions on the TfL network.

<b>Specific issues raised by the public and stakeholder organisations in response to the proposed restrictions on advertising less healthy foods on the TfL network</b>			
<b>Main issue / suggestion</b>		<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
<b>Positive action to reduce obesity</b>			
Use unsold TfL advertising sites to allow TfL to promote healthy eating and lifestyle messages, such as promoting the use of stairs rather than escalators or campaigns such as the "Daily Mile Campaign".	Advertising/ food and drink industry	Change	The London Food Strategy commits to supporting a healthy eating campaign to coincide with implementation of this policy.
Include advice on advertising of less healthy food to encourage people to eat a healthier diet, e.g.: less healthy food to carry a 'Food Aware' Compliance Notice, include a 'traffic light' system on HFSS advertising or quote the calories or calories per	Advertising/ food and drink industry	No change	There is no evidence that this option will reduce the impact of high fat, sugar, salt (HFSS) food and drink advertising seen by children.

Specific issues raised by the public and stakeholder organisations in response to the proposed restrictions on advertising less healthy foods on the TfL network			
Main issue / suggestion		Recommended category of GLA response	Recommended change to strategy
serving of the meal shown in advertising.			<p>Development of a warning system would take significant time and resource and is likely to be contested and open to legal challenge.</p> <p>Following consideration of this proposal alongside a range of options, it has been agreed that all HFSS advertising (unless a practical exception has been agreed by TfL) will be restricted across the TfL estate, for the reasons outlined <a href="#">here</a>. Advice notes on HFSS advertising would therefore not be feasible.</p>
Introduce a voluntary initiative, applied either by advertisers or the advertising sector, providing for a levy, imposed in direct proportion to spending by advertisers of less healthy food and drink.	Advertising/ food and drink industry	No change	<p>This would provide a much lower level of protection from HFSS advertising or none at all if all advertisers choose to pay the levy.</p> <p>This would require a new mechanism to collect the levy. It is very doubtful that there is a legal power for the GLA or TfL to raise such a levy.</p>

Specific issues raised by the public and stakeholder organisations in response to the proposed restrictions on advertising less healthy foods on the TfL network			
Main issue / suggestion		Recommended category of GLA response	Recommended change to strategy
Consider a contributory model to invest in healthy food messaging by the Mayor's Office, either as advertising space within any live campaigns or as "credit" to be used to purchase media space as planned by the GLA.			Following consideration of this proposal alongside a range of options, it has been agreed that all HFSS advertising (unless a practical exception has been agreed by TfL) will be restricted across the TfL estate, for the reasons outlined <a href="#">here</a> . A levy or contributory model would therefore not be feasible.
Restrict HFSS advertising on digital screens during peak school-run times. .	Advertising/ food and drink industry	No change	<p>This would significantly reduce the level of protection afforded to children compared to wider restrictions as they will be exposed to HFSS advertising on non-digital media. This could also widen inequalities as the policy would only apply in areas where advertisers have invested in digital infrastructure which are generally higher income areas. It will also be difficult to arrive at a definition that protects children at weekends and outside of term-time.</p> <p>Following consideration of this proposal alongside a range of options, it has been agreed that all</p>

<b>Specific issues raised by the public and stakeholder organisations in response to the proposed restrictions on advertising less healthy foods on the TfL network</b>			
<b>Main issue / suggestion</b>		<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
			HFSS advertising (unless a practical exception has been agreed by TfL) will be restricted across the TfL estate, for the reasons outlined <a href="#">here</a> . Use of digital screens to restrict HFSS advertising will therefore not be feasible.
Encourage participation in the Healthy Catering Commitment.	Advertising/ food and drink industry	No change	Work is already underway to support boroughs to rollout the HCC and plans are underway to identify specific measures to be included for larger takeaways ahead of any mandated application of the HCC through the London Plan. This is already covered in the current wording of the strategy.
<b>Existing regulation</b>			
Assertion in the strategy that advertising in this area in unregulated is incorrect.	Advertising industry	Change	Language amended to reflect current regulation / self-regulation environment overseen by the Advertising Standards Authority (ASA).

<b>Specific issues raised by the public and stakeholder organisations in response to the proposed restrictions on advertising less healthy foods on the TfL network</b>			
<b>Main issue / suggestion</b>		<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
Current regulations are proportionate and based on evidence and are therefore sufficient. This includes restrictions on advertising where more than 25% of the audience are children.	Advertising/ food and drink industry	No change	<p>The current 25% ‘threshold’ approach means a proportion with no absolute limit. For example, current rules would mean up to 1.2 million journeys could be made by children every day without any restrictions applying to sites further than 100 metres from a school. This is not considered acceptable, for the reasons outlined <a href="#">here</a></p> <p>Furthermore, the proposed restrictions would not only reduce children’s direct exposure to less healthy food and drink advertisements, but also the exposure of family members or carers responsible for purchasing food and drink for children.</p>
<b>Voluntary restrictions</b>			
A targeted approach should be adopted in order to “reduce the pressure for legal testing of the regulation”.	Advertising/ food and drink industry		The evidence and rationale outlined <a href="#">here</a> , which is underpinned by an overwhelmingly positive response to the public consultation on a full ban across all TfL assets, provide a sufficient basis for a non-targeted approach.



<b>Specific issues raised by the public and stakeholder organisations in response to the proposed restrictions on advertising less healthy foods on the TfL network</b>			
<b>Main issue / suggestion</b>		<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
Introduce additional restrictions near schools, i.e. over and above existing voluntary 100m exclusion and use digital screens to restrict HFSS food advertising at times where footfall of children is higher.			Following consideration of this proposal alongside a range of options, it has been agreed that all HFSS advertising (unless a practical exception has been agreed by TfL) will be restricted across the TfL estate, for the reasons outlined <a href="#">here</a>
<b>Nutrient Profiling Model (NPM)</b>			
The NPM is not an appropriate mechanism for determining whether food and drink products are “unhealthy”.	Advertising/food and drink industry	Change	Language to be changed to refer to “less healthy” food and drink, as per the scope of the NPM.
The NPM includes products which have a role to play in a balanced diet.	Advertising/food and drink industry	Change	The Mayor is supporting the use of the NPM on the basis that it: <ul style="list-style-type: none"> <li>is a scientifically robust, validated tool to identify food and drink which is HFSS, and which also takes into account the presence of beneficial nutrients/food components.</li> </ul>

<b>Specific issues raised by the public and stakeholder organisations in response to the proposed restrictions on advertising less healthy foods on the TfL network</b>			
<b>Main issue / suggestion</b>		<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
<p>London should be using different metrics or the NPM in combination with additional metrics.</p> <p>The NPM definition covers a broad range of food and drink including, but by no means limited to, "fast food".</p> <p>A ban would include products which have little or no appeal to children, or where the advertising of such is predominantly or exclusively aimed at adults.</p>			<ul style="list-style-type: none"> <li>• has been developed by the competent authorities for nutrition and health (the Food Standards Agency and Public Health England) and is the model recommended by the Department for Health &amp; Social Care and Public Health England.</li> <li>• has been carefully developed with industry engagement, is overseen by a scientific committee and has passed through extensive legal processes</li> <li>• provides regulators and advertisers with a single, objective for restricting advertising</li> <li>• is already in use by Ofcom and the Advertising Standards Authority (ASA) as the basis for advertising regulation (on TV and in non-broadcast media, including outdoor advertising).</li> <li>• is applied nationally by industry, in line with World Health Organization good practice and moderated by the ASA</li> <li>• is used in the Schools Exclusion – a voluntary measure by advertising company</li> </ul>

<b>Specific issues raised by the public and stakeholder organisations in response to the proposed restrictions on advertising less healthy foods on the TfL network</b>			
<b>Main issue / suggestion</b>		<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
			<p>members of Outsmart to limit HFSS ads within 100m of schools in London.</p> <p>However, discussions will be undertaken with industry and public health bodies to discuss criteria for considerations of exceptions where an advertiser or their agent can demonstrate, with appropriate evidence, to TfL's satisfaction, that a specific product does not contribute to HFSS diets in children.</p>
Some products which are mentioned in Government advice as part of a balanced diet to be included as part of a consumer's 5-a-day would be categorised as HFSS under the NPM.	Advertising/ food and drink industry	No change	The Government's Eatwell Guide displays foods high in saturated fat, salt and sugars outside of the main image, meaning they are not needed as part of a healthy, balanced diet. The Government advice states that "eating too much of these foods may be bad for our health, so if they are consumed, it should only be done infrequently and in small amounts".
<b>Timing</b>			

<b>Specific issues raised by the public and stakeholder organisations in response to the proposed restrictions on advertising less healthy foods on the TfL network</b>			
<b>Main issue / suggestion</b>		<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
Delay implementation until: <ul style="list-style-type: none"> <li>• a thorough impact assessment on the wider effect of the review of the NPM model has been undertaken to properly inform this policy (2020);</li> <li>• the ongoing CAP and BCAP evidence review of HFSS TV advertising and children have reported (2018)</li> <li>• the outcome of the Government's planned consultation on their plan for tackling childhood obesity (date not known)</li> </ul>	Advertising/food and drink industry	No change	The urgency in tackling this issue is considered significant enough to implement these proposals as soon as possible. Outcomes from each of these reviews will be considered and will inform policy in this area as appropriate. A review of the proposed approach to identifying food to be covered by the restrictions (e.g. the NPM plus limited exemptions) will be undertaken prior to implementing the planned changes to the NPM model.
<b>Implementation</b>			
TfL's advertising partners cannot be made responsible for determining whether an advertisement from a food and drink company and/or restaurant	Advertising industry	Clarification	Responsibility for confirming whether an advert includes copy that is covered by the restrictions will be with the advertiser and will replicate the model currently used for voluntary restrictions within 100m of schools. Further work will be undertaken

<b>Specific issues raised by the public and stakeholder organisations in response to the proposed restrictions on advertising less healthy foods on the TfL network</b>			
<b>Main issue / suggestion</b>		<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
<p>complies with restrictions that may be introduced by the Mayor.</p> <p>Media owners do not employ nutritional experts. On that basis, it would be inappropriate for them to make assessments as to whether advertisements for particular food and drink products are covered by any restriction introduced by the Mayor's Office.</p>			with industry to ensure the effective implementation of the restrictions.
<p>Transitional arrangements would be a vital part of the implementation of any new measures and would need to be devised in conjunction with industry.</p> <p>The proposals do not appear to envisage any transitional arrangements that would allow for existing contractual commitments to be met without risking non-compliance. Transitional</p>	Advertising/food and drink industry	Clarification	Further work will be undertaken with industry to ensure the effective implementation of the restrictions. Where dictated by existing contracts, or where smaller advertisers need further support, some phasing in of the proposals may be required beyond the implementation date.

<b>Specific issues raised by the public and stakeholder organisations in response to the proposed restrictions on advertising less healthy foods on the TfL network</b>			
<b>Main issue / suggestion</b>		<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
arrangements would be a vital part of the implementation of any new measures and would need to be devised in conjunction with industry.			
Further consultation should take place on how the restrictions would be implemented and enforced in practice.	Advertising/ food and drink industry	Clarification	Further work will be undertaken with industry to ensure the effective implementation of the restrictions. This will allow three months for implementation plans to be finalised prior to the implementation date.
<b>Evidence and effectiveness</b>			
<p>A ‘whole-system’ approach is needed to successfully tackle obesity in the UK.</p> <p>Undue focus on individual interventions could risk reducing the overall effectiveness of such programmes, supporting the need for holistic solutions.</p>	Advertising/ food and drink industry	Clarification	It is accepted that this one measure alone will not solve child obesity in London. That is why the London Food Strategy outlines a whole-system approach that includes proposals such as: restrictions on new takeaways opening within 400 metres of schools, a requirement for new takeaways to sign-up to the Healthier Catering Commitment, work to improve the healthy food on offer to children of all ages through the Mayor’s Healthy

<b>Specific issues raised by the public and stakeholder organisations in response to the proposed restrictions on advertising less healthy foods on the TfL network</b>			
<b>Main issue / suggestion</b>		<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
Obesity is a multi-factorial disease, which calls for a multidimensional set of interventions.			Schools and Healthy Early Years programmes, and plans to promote the takeup of Healthy Start Vouchers, and to promote wider healthy eating. It also includes proposals where action should be by other bodies, and identifies how the Mayor and other stakeholders in London can help drive national change.
<p>Banning advertisements for HFSS products on the TfL estate would reduce adults' exposure but do almost nothing to reduce children's exposure.</p> <p>Schoolchildren would make up a very small proportion of the people impacted by a ban of HFSS across the entire TfL estate.</p>	Advertising/ food and drink industry	Clarification	<p>Under current restrictions, 1.2 million journeys could be made by children each day, with exposure to junk food advertising, without the restrictions applying. This is not considered acceptable.</p> <p>Furthermore, the proposed restrictions would not only reduce children's direct exposure to less healthy food and drink advertisements, but also the exposure of family members or carers responsible for purchasing food and drink for children.</p>

<b>Specific issues raised by the public and stakeholder organisations in response to the proposed restrictions on advertising less healthy foods on the TfL network</b>			
<b>Main issue / suggestion</b>		<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
<p>Revenue from HFSS advertising currently spent on the TfL estate would simply move to other sources outside the control of TfL.</p> <p>Advertisements for HFSS products would move to other advertising mediums, including OOH sites owned by London boroughs.</p>	Advertising industry	No change	Work is being undertaken to ensure that brands that currently advertise food and drink covered by the proposed restrictions move their advertising expenditure to healthier products. Analysis of existing TfL advertising sites demonstrates that the majority of brands could replace their HFSS products with similar non-HFSS products.
Academic research has consistently failed to establish a direct link between food and drink marketing and childhood obesity	Advertising/ food and drink industry	No change	There is a growing body of evidence that the more children are exposed to advertising for less healthy foods, whether on TV, on the internet, or via outdoor advertising, the more they express a preference and desire for unhealthy food products, and the higher the risk of increasing their



Specific issues raised by the public and stakeholder organisations in response to the proposed restrictions on advertising less healthy foods on the TfL network			
Main issue / suggestion		Recommended category of GLA response	Recommended change to strategy
			consumption of those foods, and of becoming overweight or obese. <sup>3</sup>  The evidence outlined <a href="#">here</a> details this further.
A study conducted on behalf of OFCOM found that exposure to TV ads accounted for only 2% of the variation in children’s food choice, and cited TV advertising’s “modest” impact on children’s food preferences (Livingstone, 2004).	Advertising/ food and drink industry	No change	Following recent research <sup>4</sup> by University College London’s Obesity Policy Research Unit (OPRU), the accuracy and relevance of the 2% cited has been called into question. Systematic review searches and tracking-back of various references to the 2% figure concluded that the most likely source is a report <sup>5</sup> from 1983 on television food advertising on children’s diets which used self-

<sup>3</sup> Junk food marketing and childhood obesity: The evidence. Obesity Health Alliance. 2018

<sup>4</sup> Russell S, Viner R, Croke H (2018). Investigating the effect of food advertising on children’s dietary intake. Obesity Policy Research Unit Briefing Paper.

<sup>5</sup> Bolton, R (1983). Modelling the Impact of Television Food Advertising on Children’s Diets. Current Issues and Research in Advertising.

<b>Specific issues raised by the public and stakeholder organisations in response to the proposed restrictions on advertising less healthy foods on the TfL network</b>			
<b>Main issue / suggestion</b>		<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
			<p>collected data from a small cross-sectional survey conducted by a market research company in 1977 in Ohio. The sample was of 262 children aged 2-11, the majority of which were of a high socioeconomic status.</p> <p>The conclusions of the review were further called into question by the OPRU study which states there are “very major limitations to this work, not least in the lack of clarity in how analyses were conducted and apparently very different potential conclusions”, stating that the findings could be interpreted to conclude a 23% impact as opposed to the 2% figure.</p>
McKinsey Global Institute (2016) ranked media restrictions 12th out of 16 possible interventions in terms of their effectiveness in reducing obesity levels in a cost-effective way, stating	Advertising/ food and drink industry	No change	<p>The MGI report also states that:</p> <p>“Interventions in the hands of all relevant societal sectors need to be deployed. Prioritisation based on potential impact, cost effectiveness, and feasibility is always important when making investment decisions. However, in the case of</p>

<b>Specific issues raised by the public and stakeholder organisations in response to the proposed restrictions on advertising less healthy foods on the TfL network</b>			
<b>Main issue / suggestion</b>		<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
that there is “limited evidence for behaviour change”.			obesity, focusing unduly on priority interventions could be unhelpful given the need for a holistic response. A search for the “best” interventions or a single solution could delay action and displace responsibility. Given the seriousness of the obesity issue, the aim should be to do as much as possible as soon as possible."
A study conducted by Public Health England (PHE) in 2010 found the evidence to be ‘highly heterogeneous’ and ‘with a reliance on relatively small, variable quality experimental or observational studies’”.	Advertising/ food and drink industry	No change	Responses citing this study failed to acknowledge that the 45 primary research publications included in this review <sup>6</sup> provide evidence on the impact of marketing on children (29 publications), adults (14 publications), and adults and children (2 publications). Furthermore, the evidence review concludes that the resulting evidence demonstrates that overall marketing is likely to

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<sup>6</sup> Public Health England (2015). Sugar Reduction: The evidence for action

<b>Specific issues raised by the public and stakeholder organisations in response to the proposed restrictions on advertising less healthy foods on the TfL network</b>			
<b>Main issue / suggestion</b>		<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
PHE data drawn from the 2018 report Calorie reduction: the scope and ambition for action, also shows only 6% of people believe less advertising would help them consume fewer calories (PHE 2018).			<p>impact on purchasing and consumption of high sugar products, particularly among children.</p> <p>The 2018 survey was a of 1,061 adults aged 16+ in England. They were asked: ‘Here are some things that people say would help them have fewer calories. Which, if any, of these do you think would be helpful for you? One of the options was ‘Less advertising’. 6% agreed across all age groups 16+; of the 16-24 age group 10% agreed, significantly higher compared to other age groups.</p>
Obesity reduction data from the ‘Amsterdam model’ covers the period between 2012 to 2015, three years before the metro advertising intervention was introduced in that city (1 January 2018).	Advertising/food and drink industry	Clarification	Wording changed to make it clear that the reduction in child obesity was not directly attributable to the Amsterdam advertising restrictions.
<b>Scope</b>			

<b>Specific issues raised by the public and stakeholder organisations in response to the proposed restrictions on advertising less healthy foods on the TfL network</b>			
<b>Main issue / suggestion</b>		<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
Need to be clear on whether restrictions would cover food that is “not healthy”, “less healthy” or “unhealthy” as all three terms are used in the document.	Advertising/food and drink industry	Change	Language to be reviewed to ensure consistent use of the term “less healthy” which is consistent with the PHE NPM.
<p>There is no requirement for a separate “brand advertising” ban, given that this is already covered and regulated by the CAP code.</p> <p>A brand ban would have the perverse result of covering companies, such as Leon, who are actively promoting the consumption of healthier food.</p> <p>In relation to the brand-only advertising ban, it is not clear whether this ban is proposed to cover all food and drink companies, any food and drink company that sells one or more HFSS products or only food and drink</p>	Advertising/food and drink industry	Clarification	The proposals regarding brand-only or directional advertisements have been clarified and will require food and drinks brands to promote their healthier options as part of their copy if they wish to place directional or brand-only advertisements.

<b>Specific issues raised by the public and stakeholder organisations in response to the proposed restrictions on advertising less healthy foods on the TfL network</b>			
<b>Main issue / suggestion</b>		<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
companies that sell predominantly HFSS products.			
<p>Restaurants and shops which currently reside on the TfL estate would be able to sell their HFSS products on the TfL estate but not to advertise them.</p> <p>Children using TfL services would still be potentially exposed to HFSS advertising, including promotional discount vouchers for fast food in newspapers available at stations, such as Metro and Evening Standard.</p>	Advertising/ food and drink industry	Clarification	<p>Work is ongoing to encourage TfL tenants to promote their healthier products, and efforts are being made to codify these arrangements.</p> <p>Future contracting arrangements for partnerships will include consideration of whether the promotion of HFSS food (e.g. through promotional vouchers) will be considered.</p>
Include alcohol within the restrictions in view of the strong evidence from home and abroad that indicates exposure to alcohol advertising adversely impacts children.	Public health bodies.	No change	The scope of the proposed restrictions is specifically aimed at reducing child obesity. Wider public health issues associated with children's awareness and consumption of alcohol are included in objective 5.3 of the Mayor's Health Inequalities Strategy which commits to steps being

<b>Specific issues raised by the public and stakeholder organisations in response to the proposed restrictions on advertising less healthy foods on the TfL network</b>			
<b>Main issue / suggestion</b>		<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
			taken to reduce the use of, and harms caused by, tobacco, illicit drugs, alcohol and gambling.
<b>Economic Impact</b>			
<p>Funds to support London's transport network would be lost.</p> <p>Investment by industry in infrastructure and local communities would be affected if income was reduced.</p> <p>Impact on jobs within the advertising sector if income was reduced.</p> <p>Loss of revenue resulting from a complete ban would have a substantial financial impact for TfL and its media partners.</p>	Advertising industry		<p>The Mayor has publicly stated that he believes that there will be no significant impact on TfL revenues if TfL continue to work with brands to ensure they move their advertising expenditure to healthier products.</p> <p>Analysis of existing TfL advertising sites demonstrates that most brands could replace their HFSS products with non-HFSS products.</p>

### Chapter 3: Good Food in Community Settings and Public Institutions

#### Who responded

A variety of stakeholders commented on Chapter 3 in the draft LFS, although fewer than for chapters 1 and 2. Of those that responded, the top three categories were as follows:

**Table 3.13: Top three categories of respondents to Chapter 3: Good Food in Community Settings and Public Institutions**

Category	Number of respondents
Charity/non-profit organisation	23
Local authority/political body	20
Business/business group	11

#### Main themes

The top four themes raised by stakeholders in response to Chapter 3: Good Food in Community Settings and Public Institutions are included in **table 3.14** below.

**Table 3.14: Top five themes raised as part of stakeholder responses to the Good Food in Community Settings and Public Institutions**

Theme	Number of responses
Procurement should consider healthy, sustainable options & living wage in the supply chain	31
Breastfeeding: more should be done to encourage greater uptake	26
Food businesses	18
Food growing: more use could be made of public land for growing projects	18

#### Summary of public consultation

**Table 3.15: Comparison between Talk London respondents and representative polling on topics relating to food and children:**

- ‘Good food in public places like schools, hospitals, leisure centres and in other community spaces’ was listed as the 2<sup>nd</sup> out of 6 most important themes in the draft London Food Strategy.



Summary of stakeholder consultation

**Table 3.16** summarises the key themes from the stakeholder consultation in relation to Chapter 3: Good Food for Community Settings and Public Institutions

<b>Table 3.16 Issues raised by stakeholders in response to Chapter 3: Good Food in Community Settings and Public Institutions</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
<b>General</b>			
One stakeholder recommended that there should be wider provision of <b>healthy food for staff in hospitals</b> in the LFS.	Charity/non-profit organisation	No change	Not changed as already adequately reflected
A range of stakeholders suggested putting more emphasis on the <b>most marginalised groups</b> the homeless, disabled, elderly, unemployed.	Community group  Charity/non-profit organisation	No change	Not changed here as mentioned elsewhere in Strategy Changed to also mention malnutrition, to which marginalised groups may be even more susceptible
A small number of stakeholders advised that ensuring <b>physical as well as financial access to good food</b> is also critical to address food insecurity, including meals provided in community settings and public institutions.	Local authority/political body  Charity/non-profit organisation	Clarification	Added sentence in narrative to highlight the role of community settings helping to reduce food insecurity.

<b>Table 3.16 Issues raised by stakeholders in response to Chapter 3: Good Food in Community Settings and Public Institutions</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
One stakeholder advised that other public institutions such as <b>prisons and care homes</b> should be mentioned under ‘priorities to be led by external partners’. Whilst these are mentioned in the introductory narrative to chapter 3, they are not covered under the actions.	Local authority	Change	Highlight the importance of prisons and care homes in narrative. Action notes “...[public sector] settings are extremely varied, and consideration should be given to those less-often considered, such as care homes and prisons.
One stakeholder advised that chapter 3 should <b>recognise and celebrate the role of the third sector</b> in building social cohesion and reducing loneliness through food.	Charity/non-profit organisation	Clarification	The introductory narrative to chapter 3 has been updated to include reference to increasing community cohesion and reducing loneliness.
<b>Working with business</b>			
One stakeholder would like to see a strengthening of the <b>Healthier Catering Commitment</b> within Chapter 3 of the LFS. The stakeholder stated that the local authorities and communities should lead by example and the scheme provides an ideal platform to do so.	Professional body/institution	No change	No change made as mentioned elsewhere in Strategy.

<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
A stakeholder advised that through the LFS the Mayor should <b>support local authorities and businesses</b> to help staff eat healthy, sustainable food and improve food in the workplace.	Local authority	No change	Not changed as sufficiently highlighted elsewhere in Strategy.
One stakeholder advised that wording should be strengthened to help create an environment where those who wish to <b>breastfeed</b> in public institutions and community settings for staff and visitors can do so.	Charity/non-profit organisation	No Change	Sufficient priority already given in Chapter 3 and Chapter 4.
A stakeholder pointed out that in the action relating to hospitals under 'Priorities to be led by external partners' it is important to add <b>NHS Improvement (NHSI)</b> to this list. A London Food Board member has just been appointed to an NHSI working party to improve hospital food.	Charity/non-profit organisation	Change	Added "...NHS Improvement (NHSI)..."

## Chapter 4: Good Food for Pregnancy and Childhood

### Who responded

There were many comments in relation to Chapter 4 from a range of stakeholders. Of those that responded, the top three categories of stakeholders are set out below.

**Table 3.17: Top three categories of respondents to Chapter 4: Good Food for Pregnancy and Childhood**

Category	Number of respondents
Charity/non-profit organisation	29
Local authority/political body	15
Business/business group	10

### Main themes

The main themes that stakeholders raised in relation to Chapter 4: Good Food for Pregnancy and Childhood are included in **table 3.18** below.

**Table 3.18: Top three themes raised as part of stakeholder responses to Good Food for Pregnancy and Childhood**

Theme	Number of responses
School Food: standards should be improved/free school meal uptake needs to increase.	14
Best practice: exposing children to and educating about healthy choices at a young age	11
Breastfeeding: encouraging greater uptake and providing support to reduce inequality	10

### Summary of public consultation

#### **Summary of quantitative findings**

There is majority support for giving local authorities the power to prevent new hot food takeaways from opening near schools. Among a representative sample of the population, 56% of Londoners support this, 14% oppose, and 30% either don't know or neither support nor oppose. Highest support comes from older Londoners (61% for those who are 50-64 and 60% for those who are over 60, compared to 43% of

those who are 18-24). Higher social grade Londoners are also more likely to support this (59% of ABC1 Londoners, compared to 52% of C2DE Londoners).

**Table 3.19: Comparison between Talk London respondents and representative polling on topics relating to food and children:**

- Respondents to the Talk London survey were asked who they think is mainly responsible for tackling childhood obesity in London. The most common selection was the food and drinks industry (24%), followed by the government (20%) and schools and nurseries (13%). Only 5% thinks the Mayor of London is mostly responsible.
- There is more support for giving local authorities the power to prevent new hot food takeaways from opening near schools among Talk London respondents (75% compared to 56% of the representative London sample).
- However, there are equal proportions of respondents who oppose (12% Talk London compared to 14% of the representative sample)

## Summary of qualitative findings

### Food at schools

Many focus groups participants talked about the quality of provision of food at schools. Whereas some older focus group participants think the quality of meals has improved, most participants think there is too much unhealthy food and want schools to stop serving junk food and sugary drinks. Respondents also questioned why schools serve dessert at lunch, preferring that they serve fruit or yoghurt instead.

Other issues raised include banning cake sales in schools and concerns about the level of pesticides and chemicals in school food. Some also want schools to serve a greater variety of food including fermented foods. A few compared school meals in London/UK with those served in France and other countries, which are seen to be healthier and better quality.

Many focus groups participants want better and updated education about food and healthy eating at school, including more education on food types and ingredients so children are better able to understand what they are eating as well as more education on the impact of food on physical health, mental health, mood, sleep, and the environment. However, reiterating previous points, some focus group participants see no point educating children about food at school if they are then able to buy unhealthy food at the canteen or in vending machines.

### Fast food near schools

Participants in all focus groups were concerned about the availability and consumption of fast food among schoolchildren and were concerned about the number of fast food outlets near schools. There was strong support for the ban of new fast food outlets opening within 400m of schools. Some Talk London respondents also suggested a ban of food fast food outlets near playgrounds, as well as a ban on ice cream vans outside schools and playgrounds.

However, after reflection, focus groups participants did not think banning new fast food outlets from opening near schools will solve the problem and stop schoolchildren eating fast food as there are already too many near schools – this intervention is seen as ‘too little too late’.

Instead, some thought the objective should be to dissuade schoolchildren from buying fast food in the first place or restrict those outlets that are already operating. However, some participants acknowledged that fast food is the only affordable option for children from poor families and that there needs to be more healthy alternatives for children, not impose bans on existing food.

### Responsibility of parents

In addition to schools, many respondents think parents are responsible for the diet of their children and should be targeted as well as schools – they think the problem should be tackled at both school and home, and that for children to eat healthy parents need to eat healthy as well and set an example. Many parents said they are strict with what they allow their children to eat and drink, avoiding fast food or sweetened food/drinks (which are only given on special occasions or one-off) and instead substituting bad food for good food (e.g. water instead of juice or fruit instead of sweets).

Some respondents blamed parents for taking their children to fast food places or serving junk food at home, and not being strict enough with their children’s diets. Others defended parents who are working long hours and are low-paid so have to rely on bad food, and think it is easier for parents to eat healthy and make their children eat healthy if they are affluent. A couple of respondents want schools to discourage parents from bringing in unhealthy food for children when collecting them from school.

### Summary of stakeholder consultation

**Table 3.20** summarises the key themes from the stakeholder consultation in relation to Chapter 4: Good Food for Pregnancy and Childhood along with the GLA’s recommended response.

<b>Table 3.20: Issues raised by stakeholders in response to Chapter 4: Good Food for Pregnancy and Childhood</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
<b>General</b>			
A small number of stakeholders felt that the <b>name of the chapter</b> is not inclusive enough as ‘education’ does not capture settings outside schools such as youth clubs.	Local authority/political body  Charity/non-profit organisation	Clarification	The name of chapter 4 in the final London Food Strategy has been changed from ‘Good Food for Maternity, Early Years, Education and Health’ to ‘Good Food for pregnancy and childhood’.
A small number of stakeholders requested that the London Food Strategy refers to the prevention devolution ‘ <b>super zones pilot</b> ’ aiming to encourage healthy behaviours within 400m of schools.	Local authority  Healthcare provider/body	Change	An action has been added under ‘priorities to be led by external partners’ encouraging local authorities to get involved in the super zones pilot.
<b>School food</b>			
Several stakeholders raised the issue of <b>universal free school meals</b> . Stakeholders asked for:	Charity/non-profit organisations  Local authorities/ political body	Change	An action has been added under ‘what the Mayor will do to support change’ for the Mayor to lobby government to provide universal



<b>Table 3.20: Issues raised by stakeholders in response to Chapter 4: Good Food for Pregnancy and Childhood</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
<p>The Mayor to work towards universal free school meals for London.</p> <p>The Mayor to lobby central Government to keep Free School Meals for pupils in secondary school whose parents receive Universal Credit.</p> <p>Further support local authorities to increase uptake of free school meals.</p>			free school meals and produce further guidance for schools.
<p>A range of stakeholders highlighted the importance of <b>food education</b> including cooking skills, education around healthy eating. One stakeholder suggested adding a food module to the London Curriculum.</p>	<p>Business</p> <p>Charity/non-profit organisation</p> <p>Author</p> <p>Local authority/political body</p>	Change	<p>A reference to the importance of good food education has been included in the narrative to chapter 4 of the LFS. Actions have also been added under 'Priorities to be led by external partners' referring to good food education.</p> <p>Officers working on the food programme are in discussion with those leading on the London</p>

<b>Table 3.20: Issues raised by stakeholders in response to Chapter 4: Good Food for Pregnancy and Childhood</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
			Curriculum to explore the possibility of incorporating food into the London Curriculum.
<p>A large number of stakeholders commented on the <b>Healthy Schools London</b> programme. Most comments related to the content of the HSL award and the need for the food elements to be strengthened. Stakeholders also requested that the Mayor lobby schools to accept the help and education offered through the Healthy Schools programme.</p> <p>A small number of stakeholders requested an update to the third action under ‘what can you do’ to add Food for Life as well as Healthy Schools London as this programme has much more of a focus on food.</p>	<p>Local Authorities</p> <p>Charity/non-profit organisation</p> <p>Professional body/institution</p>	No change	<p>No changes have been made to the wording in the London Food Strategy itself, as these comments relate to the content of the HSL programme.</p> <p>All comments have been passed to the HSL team and these have been considered in the review of the bronze award.</p> <p>The HSL team continue to work to increase the number of schools signing up to the HSL programme.</p> <p>80% of all London schools are signed up to Healthy Schools London – 2047 schools. Over</p>

<b>Table 3.20: Issues raised by stakeholders in response to Chapter 4: Good Food for Pregnancy and Childhood</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
			half of these schools have achieved a Bronze Award.
<p>A range of stakeholders raised the issue of schools' involvement in <b>food insecurity and holiday hunger</b>.</p> <p>In addition, a small number of stakeholders stated that identifying children who are facing or at risk of food poverty was vital and suggested the Mayor Lobby Government for further funding and guidance on this issue.</p>	<p>Local Authority/political body</p> <p>Charity/non-profit organisation</p>	Change	<p>Holiday hunger is covered in Chapter 1 of the LFS. The final action under 'Priorities to be led by external partners' in this chapter has been expanded to include the role schools can play in Addressing food insecurity.</p> <p>There are many areas covered by the LFS that are relevant to more than one chapter. A 'Background' section has been added to the strategy to make clear that it should be read as a whole and that many areas cover more than one chapter.</p>

<b>Table 3.20: Issues raised by stakeholders in response to Chapter 4: Good Food for Pregnancy and Childhood</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
<p>Many stakeholders commenting on school food highlighted <b>School Food Standards</b> as a key issue. Suggestions included:</p> <p>Lobbying the Government to raise the standards of school food across the school day, produce further guidance for schools on menus and introduce legislation to require all academies and free schools to comply with the Standards.</p> <p>Establishing a ‘London Food Standard’ which is more ambitious than the national standards given London’s child obesity rates.</p> <p>Ensure special diets such as Coeliac disease are properly reflected, and guidance is provided.</p>	<p>Local authority/political body</p> <p>Professional body/institution</p> <p>Charity/non-profit</p>	Change	<p>An additional action has been added under ‘What the Mayor will do to support change’ which states that the Mayor will lobby Government on school food.</p> <p>There are no current plans to establish a London Food Standard, rather to work with the existing national standards.</p>
<p>There was a lot of support for the priority to be led by external partners that Schools, governors and educational charities should recommend <b>OFSTED adopt food as a key</b></p>	Charity/non-profit	Change	<p>Additional wording has been added to action 3 under ‘Priorities to be led by external partners’ to encourage Governors to seek</p>

<b>Table 3.20: Issues raised by stakeholders in response to Chapter 4: Good Food for Pregnancy and Childhood</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
<p><b>indicator</b> of schools’ and early years’ settings’ performance. Stakeholders asked that this go further by explicitly rate health and nutrition during inspection and suggested that Governors should seek evidence of compliance with School Food Standards.</p>	<p>Local authority/political body</p> <p>Professional body/institution</p>		<p>evidence of compliance with School Food Standards.</p>
<p>A number of stakeholders stated that <b>secondary schools</b> need to be better reflected in Chapter 4 and that the targeting of teenagers with junk food needs to be addressed.</p>	<p>Local authority/political body</p> <p>Charity/non-profit organisation</p> <p>Business/ business group</p>	<p>Clarification</p>	<p>Wording has been added to the introductory narrative for chapter 4 that references the actions the Mayor is taking to reduce children’s exposure to junk food.</p> <p>The LFS contains actions to restrict junk food advertising, support boroughs to produce Good Food Retail Plans, and proposals to restrict new takeaways opening within 400m of new and proposed schools and be required to operate in compliance with the Healthier</p>

<b>Table 3.20: Issues raised by stakeholders in response to Chapter 4: Good Food for Pregnancy and Childhood</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
			Catering Commitment. These actions are aiming to contribute to tackling child obesity in London.
A small number of stakeholders highlighted the importance of involving children in <b>growing food</b> to encourage healthy eating and requested the food growing in schools is encouraged in this chapter.	Charity/non-profit organisation  Local authority/political body	Clarification	The importance of food growing in schools is recognised and is referenced in Chapter 5 of the London Food Strategy.  Wording has also been added to the introductory narrative of Chapter 4 which references food growing and food education.
<b>Early years nutrition</b>			
Several stakeholders highlighted the importance of <b>good nutrition in early years</b> and stated that chapter 4 should include more references to and support for good food in early years.	Charity/non-profit organisation  Local authority/political body	Change	The Mayor's Healthy Early Years programme launched in October 2018 and will support Early Years settings across London to provide good food.

<b>Table 3.20: Issues raised by stakeholders in response to Chapter 4: Good Food for Pregnancy and Childhood</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
	Professional body/institute		Additional actions and additional wording to actions have also been added under both ‘Priorities to be led by external partners’ and ‘what you can do’ which reference early years.
<b>Infant feeding</b>			
<p>A wide range of stakeholders requested that <b>bolder action on breastfeeding</b> is needed in the London Food Strategy. Suggestions included:</p> <p>A bold aim to make London a breastfeeding friendly city, enabling mothers to feel comfortable feeding their babies wherever and however they wish to do so.</p> <p>The need to monitor breastfeeding rates in London</p>	<p>Healthcare provider/body</p> <p>Professional body/institute</p> <p>Charity/non-profit organisation</p> <p>Charity/ non-profit organisation</p> <p>Local authority/political body</p>	Clarification	Action 2 under ‘what the Mayor will do to support change’ has been amended to reference buildings in the GLA Group becoming welcoming places for breastfeeding and working towards London becoming a breastfeeding-friendly city. In addition, the action has been updated to include reference to helping women return to work by supporting them to breastfeed, express and store breastmilk

<b>Table 3.20: Issues raised by stakeholders in response to Chapter 4: Good Food for Pregnancy and Childhood</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
<p>The need for clarity on how the Mayor intends to encourage boroughs to become UNICEF UK Baby-Friendly Initiative accredited</p> <p>The need to lead by example by making City Hall a welcoming place for mothers that wish to breastfeed</p>	<p>Healthcare provider/organisation</p> <p>Professional body/institution</p>		<p>Further information on breastfeeding is included in the Implementation Plan.</p> <p>As stated in the Health Inequalities Strategy Consultation Report, the inclusion of metrics for breastfeeding has been considered, but the data is not currently robust enough to include within proposed measures.</p>
<p>Stakeholders requested that the Mayor used his <b>control of the TfL network</b> to both:</p> <p>Make the TfL network more welcoming to those that need to feed their babies.</p>	<p>Charity/non-profit organisation</p> <p>Professional body/institution</p>	Change	<p>An additional action has been added under 'What the Mayor will do to deliver change' which states that the Mayor will work in partnership with Transport for London to ensure those feeding their infants are supported to do</p>



<b>Table 3.20: Issues raised by stakeholders in response to Chapter 4: Good Food for Pregnancy and Childhood</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
Removing advertising of any foods and drinks advertised for children under three years of age.			<p>so whilst using London’s transport network.</p> <p>There are no current plans to remove advertising of food and drink for children under three, but this will be reviewed in the future.</p>
<b>Child obesity</b>			
A small number of stakeholders requested that the need to significantly impact on <b>child obesity rates</b> in London should be an aim in the London Food Strategy, for example ‘halve the rate of child obesity by 2030’. It was recognised that this will also require a national approach therefore support was given for the Mayor to lobby Government to help achieve a reduction in Child Obesity.	<p>Business/ business group</p> <p>Charity/non-profit organisation</p> <p>Local authority/political body</p>	Clarification and change	<p>Text has been added to the introductory narrative of Chapter 4 stating the Mayor’s aims around reducing child obesity.</p> <p>Action 1 under ‘What the Mayor will do to deliver change’ has also been strengthened.</p>

<b>Table 3.20: Issues raised by stakeholders in response to Chapter 4: Good Food for Pregnancy and Childhood</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
Stakeholders welcomed the Mayor’s commitment to convene a <b>Child Obesity Taskforce</b> and asked that a clear plan of what this Taskforce will work on is produced.	Charity/non-profit organisation  Business/ business group  Local authority/political body  Professional body/institute  Healthcare provider/body	No change	The London Child Obesity Task Force was launched on 17 October 2018 to lead action to reduce childhood obesity and related inequalities.  The Taskforce has committed to halve by 2030 the percentage of London’s children who are overweight at the start of primary school, and obese at the end of primary school, and to reduce the obesity gap between the richest and poorest areas.
<b>Healthy Start</b>			
A wide range of stakeholders commented on the first action under ‘What the Mayor will do to support change’ regarding increasing the uptake of Healthy Start vouchers. Many of these comments related to the specifics of the national programme and the need for the	Professional body/institution  Business/ business group	Clarification	The Mayor will respond to the upcoming DHSC consultation on Health Start vouchers, and ensure comments received

<b>Table 3.20: Issues raised by stakeholders in response to Chapter 4: Good Food for Pregnancy and Childhood</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
<p>Mayor to lobby government on these as part of the upcoming consultation by the Department of Health and Social Care (DHSC).</p> <p>Several stakeholders raised the issue of the need to increase the number of informal settings such as markets accepting healthy start.</p> <p>Stakeholders also asked for the strategy to be more specific around how the Mayor will support an increased uptake of Healthy Start vouchers to 80% of eligibility.</p>	<p>Local authority/political body</p> <p>Charity/non-profit organisation</p>		<p>through the consultation on the draft LFS are reflected.</p> <p>The Implementation Plan that accompanies the final LFS contains further detail on how the Mayor will support an increased uptake. This includes convening a working group and working in partnership with London Markets Board to identify the barriers and opportunities to markets accepting Healthy Start Vouchers.</p>
<b>London Plan restriction on new hot food takeaways</b>			
<p>Many stakeholders expressed their support for the implementation of a <b>restriction on new hot food takeaways opening within 400m of an existing or proposed school</b>. A small</p>	<p>Local Authority/political body</p>	<p>No change/ Clarification</p>	<p>Policy E9: Retail, markets and hot food takeaways in the draft New London Plan will be subject to Examination in Public in 2019.</p>

<b>Table 3.20: Issues raised by stakeholders in response to Chapter 4: Good Food for Pregnancy and Childhood</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
<p>number suggested extending this to early years settings.</p> <p>A number also highlighted the Draft New London Plan policy to require all new hot food takeaways to comply with the Healthier Catering Commitment, and the need to reference this in the London Food Strategy.</p>	<p>Community Group</p> <p>Charity/non-profit organisation</p> <p>Business/ business group</p> <p>Professional body/institution</p>		<p>There are no current plans to extend restrictions of hot food takeaways to within 400m of early years settings.</p> <p>Action 2 under ‘What the Mayor will do to deliver change’ has been updated to include reference to new hot food takeaways being required to comply with the Healthier Catering Commitment.</p>
<b>Oral Health</b>			
<p>A number of stakeholders expressed disappointment that <b>oral health</b> is only referenced once on page 29 and requested that the link between child obesity and oral health is made more explicit in the London Food Strategy.</p>	<p>Local authority/political body</p> <p>Professional body/institution</p>	<p>Change and clarification</p>	<p>Levels of poor oral health among children are rising. An additional action has been added under ‘Priorities to be led by external partners’ referencing the need for partners to address inequalities in child oral health.</p>

**Table 3.20: Issues raised by stakeholders in response to Chapter 4: Good Food for Pregnancy and Childhood**

<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
			Although oral health is not explicitly referenced elsewhere in the strategy, actions to reduce sugar intake are included throughout.

## Chapter 5: Good Food Growing, Community Gardens and Urban Farming

### Who responded

The top three categories of stakeholders that commented on Chapter 5: Good Food Growing, Community Gardens and Urban Farming are as follows:

**Table 3.21: Top three categories of respondents to Chapter 5: Good Food Growing, Community Gardens and Urban Farming**

Category	Number of respondents
Charity/non-profit organisation	22
Local authority/political body	13
Business/business group	9

### Main themes

A range of themes were covered by stakeholder in their comments on this chapter. The top three themes raised are included in **table 3.22** below.

**Table 3.22: Top three themes raised in response to Chapter 5: Good Food Growing, Community Gardens and Urban Farming**

Theme	Number of responses
Provision and protection of spaces	23
Best practice: community growing projects, local food selling initiatives	13
Urban farming	5

### Summary of public consultation

#### **Summary of quantitative findings**

**Table 3.23: Talk London survey findings (non-representative) related to food growing, community gardens and urban farming**

- 'Good food growing, community gardens and urban farming' was ranked the least important of the six themes in the draft London Food Strategy.
- 27% of Talk London respondents grow their own food, and a further 19% plan to do so. 5% are in a local community food growing project, and a further 10% plan to do this.

## Summary of qualitative findings

Respondents reported growing a diverse range of food themselves: tomatoes, beans, courgettes, spinach, herbs, strawberries, cherries, rhubarb, potatoes, berries, plums and apple trees. None reported rearing animals for meat or eggs. Some respondents highlighted benefits of urban growing and community growing, e.g. impact on health and benefits for communities. One respondent runs a community growing project on their estate, organising corporate days to generate income through a local charity broker.

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“I like the idea of urban garden spaces where residents can work together growing & using/selling their produce. Would encourage people to think with a 'more healthy' hat on and possibly take responsibility themselves to eat better.” [Talk London respondent]

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However, some barriers existing for Londoners to grow their own food at home. A key barrier is lack of space, for those respondents without gardens. However, for other respondents it is still possible to grow in window boxes and balconies. Time was mentioned as another barrier, as respondents said that growing food at home and maintaining a garden is a considerable time commitment that many Londoners cannot meet. Growing and using one’s own food was described way of life, organising holidays and free time around seasons and micro-management of vegetable beds to prevent invasion by birds/foxes. Physical capability and disability was also mentioned as a limiting factor for growing at home.

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“Gardening is time-consuming and hard work. I am sad to see so many of my neighbours paving over their gardens. A young couple moved in next door and they both work so I offered to cut their back lawn, mainly because I was worried they would pave it. Working hours are very long these days and young people with jobs and children don't have time for vegetable growing.” [Talk London respondent]

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The availability of allotments is a concern for respondents, specifically long waiting lists to apply and concerns that they are threatened by closure. There is also a perception among some that the allocation process is not transparent. Those that have allotments would like to see more allotments in London or at the very least protect the ones that exist already, either in the London Plan or otherwise. One suggested solution included outer London boroughs accepting more tenants from inner London areas where provision is most stretched. A website called Lend & Tend was also mentioned, which links people who have gardens and can’t manage them

with people who want a space to grow their own produce and flowers. Lastly, schools were identified as a means through which growing your own food could be encouraged.

Summary of stakeholder consultation

**Table 3.24** summarises the views of stakeholders in relation to Chapter 5: Good Food Growing, Community Gardens and Urban Farming.



**Table 3.24: Issues raised by stakeholders in response to Chapter 5: Good Food Growing, Community Gardens and Urban Farming**

Main issue / suggestion	Stakeholder category	Recommended category of GLA response	Recommended change to strategy
<b>Specific user groups</b>			
A small number of stakeholders felt that more emphasis is needed on schools and the <b>benefits of children growing food</b> in the London Food Strategy.	Business/ business group Charity/non- profit organisation Community Group Food partnership	Clarification	Further references to schools have been included in the narrative, including the benefits of involving children in food growing.  Food Growing Schools London and Capital Growth, both of which support food growing, are already referenced several times in this chapter.
The benefit that food growing can have in reducing <b>social isolation</b> in communities was highlighted by a small number of stakeholders.	Local authority/political body Other	Clarification	Reference to social isolation has been included in paragraph one of the introductory narrative to this chapter.
<b>Funding</b>			
A number of stakeholders highlighted projects they are involved in and <b>requested funding</b> to support these.	Food Partnership	No change	The Mayor has provided support and funding for several food growing programmes, most notably the London-wide capital

**Table 3.24: Issues raised by stakeholders in response to Chapter 5: Good Food Growing, Community Gardens and Urban Farming**

Main issue / suggestion	Stakeholder category	Recommended category of GLA response	Recommended change to strategy
	Charity/non-profit organisation  Community group		<p>growth network and Food Growing Schools London programmes. The Mayor continues to help fund Capital Growth as this is a strategic programme for the whole of London.</p> <p>The Mayor will not be providing support for individual, local projects unless this is through one of his existing funding programmes.</p>
<b>Benefits of food growing</b>			
A number of stakeholders felt that the strategy should be clearer on the <b>multiple benefits of food growing</b> , including for health.	Charity/non-profit organisation  Business/ business group	Clarification	The introductory narrative to Chapter 5 has been updated to include further references to the benefits of food growing.

**Table 3.24: Issues raised by stakeholders in response to Chapter 5: Good Food Growing, Community Gardens and Urban Farming**

Main issue / suggestion	Stakeholder category	Recommended category of GLA response	Recommended change to strategy
	Local authority/political body		
A range of stakeholders stated that the <b>biodiversity and wider environmental benefits</b> of food growing should be clearly stated in chapter 5 of the London Food Strategy. A number recommended that food growing spaces should be managed to increase and enhance biodiversity as far as possible.	Local authority/political body  Food Partnership  Charity/non-profit organisation	Clarification	Reference to some of the environmental benefits food growing can deliver has been included in the introductory narrative to Chapter 5.
<b>Type of food growing</b>			
A small number of stakeholders felt that although <b>innovative ways to grow food should</b> be encouraged, specifically referring aquaponics and vertical farms appears out of place as other methods of growing food are	Charity/non-profit organisation  Local authority/political body	Change	Action 1 under 'What the Mayor will do to support change' has been amended to reference wider innovation and specific reference to aquaponics and vertical farms has been removed.

**Table 3.24: Issues raised by stakeholders in response to Chapter 5: Good Food Growing, Community Gardens and Urban Farming**

Main issue / suggestion	Stakeholder category	Recommended category of GLA response	Recommended change to strategy
more beneficial to the environment and communities.			
A range of stakeholders recommended that the <b>type of growing</b> supported by the Mayor should be made clear in the London Food Strategy and that this should include agro-ecological fruit, vegetable and salad (horticultural) production at all scales – for the multiple environmental and health benefits this would provide.	Charity/non-profit organisation  Food Partnership	Change (addition)	Additional wording has been added to the introductory narrative referencing the type of growing supported.  Action 4 under ‘what the Mayor will do to deliver change’ has been updated to include reference to nature friendly farming that enhances the environment.
A number of stakeholders commented on <b>fruit and nut tree planting</b> . Some recommended the Mayor should provide guidance on where such trees should be planted while others suggested that the Mayor support fruit	Local authority/political body  Charity/non-profit organisation	No change	The Mayor supports the planting of fruit and nut trees in appropriate locations as part of his tree planting programmes and will continue to do so.

**Table 3.24: Issues raised by stakeholders in response to Chapter 5: Good Food Growing, Community Gardens and Urban Farming**

Main issue / suggestion	Stakeholder category	Recommended category of GLA response	Recommended change to strategy
and nut tree planting as part of his tree planting programmes.			There are no plans for the Mayor to produce guidance on where trees should be planted. There is already existing guidance on where different types of trees should be planted, including TDAG's Tree Species Selection for Green Infrastructure: A Guide for Specifiers <sup>7</sup> .
<b>Procurement</b>			
A number of stakeholders recommended that the London Food Strategy includes an action <b>to make the link between local food producers and public sector procurement</b> – aiming to increase the amount of food produced in	Charity/non-profit organisation  Professional body/institute  Business/ business group	Change	An additional action has been added under 'What the Mayor will do to support change':  'Through the London Food Board, work with partners to explore the potential to integrate more SME

<sup>7</sup> <http://www.tdag.org.uk/species-selection-for-green-infrastructure.html>

**Table 3.24: Issues raised by stakeholders in response to Chapter 5: Good Food Growing, Community Gardens and Urban Farming**

Main issue / suggestion	Stakeholder category	Recommended category of GLA response	Recommended change to strategy
<p>London that is consumed in London, which would support local producers and encourage more local food production.</p>	<p>Community group</p>		<p>food producers into GLA Group and public sector contracts.'</p> <p>Reference to procurement has also been included in the introductory narrative to Chapter 5.</p>
<b>Social prescribing</b>			
<p>A range of stakeholders highlighted the multiple benefits of <b>social prescribing</b> which links to food growing initiatives, including for mental and physical health. Stakeholders felt that more emphasis should be placed on social prescribing in the London Food Strategy.</p>	<p>Local authority/political body</p> <p>Healthcare provider/body</p> <p>Charity/non-profit organisation</p>	<p>Change</p>	<p>An additional action has been included under 'What the Mayor will do to deliver change' which references the Mayor's commitment to develop a vision for social prescribing in London. This replaces action 2 in the draft LFS referencing social prescribing under 'what the Mayor will do to support change'</p>

**Table 3.24: Issues raised by stakeholders in response to Chapter 5: Good Food Growing, Community Gardens and Urban Farming**

Main issue / suggestion	Stakeholder category	Recommended category of GLA response	Recommended change to strategy
			An additional priority has also been added under 'Priorities to be led by external partners' which encourages healthcare professionals and those working in public health to support the prescribing of food growing, and space providers to link with the health sector.
<b>Protection and provision of food growing spaces</b>			
A wide range of stakeholders expressed the view that <b>existing food growing spaces</b> – including community spaces and allotment - need to be more strongly protected by the Mayor. Many felt that the current action that encourages local authorities to protect spaces needs strengthening.	Business/ business group Community group Local authority/political body Charity/non-profit organisation	Change	The draft New London Plan is the primary vehicle to protect food growing sites in London. Following the consultation period, the wording in the draft New London Plan has been updated in relation to food growing (mainly in Policy G8 – Food Growing).  Actions 1 under 'what the Mayor will do to deliver change' has

**Table 3.24: Issues raised by stakeholders in response to Chapter 5: Good Food Growing, Community Gardens and Urban Farming**

Main issue / suggestion	Stakeholder category	Recommended category of GLA response	Recommended change to strategy
	Other		<p>been updated to reflect the minor changes.</p> <p>The New London Plan will be finalised following the Examination in Public in 2019.</p>
<p>A number of stakeholders requested that the London Food Strategy <b>go further</b> encourage or require the provision more permanent food growing spaces in appropriate places London, as well as their protection.</p>	<p>Local authority/political body</p> <p>Author</p> <p>Business/ business group</p> <p>Food partnership</p> <p>Healthcare provider/body</p>	Change	<p>The draft New London Plan is the primary vehicle for the provision of food growing spaces in London. As above, Actions 1 and 2 in the London Food Strategy have been updated to ensure they are in line with the draft New London Plan.</p> <p>The draft New London Plan and the London Environment Strategy also contain policies and actions aiming to increase food growing, through the protection and increase of green infrastructure</p>



**Table 3.24: Issues raised by stakeholders in response to Chapter 5: Good Food Growing, Community Gardens and Urban Farming**

Main issue / suggestion	Stakeholder category	Recommended category of GLA response	Recommended change to strategy
			and protection of the green belt, and food growing in new developments.
A small number of stakeholders raised the issue of <b>allotments</b> , particularly the long waiting lists. Suggestions also included including a live map on the GLA website to show vacant allotment spaces and reviewing the system for allocating allotment spaces.	Local authority/political body	Change	The draft New London Plan contains policy G8 which aims to protect allotments.  Allotment spaces are the responsibility of local authorities who allocate allotment spaces. An additional action has been added under ‘priorities to be led by external partners’ which encourages local authorities to ensure up to date information on available allotment spaces is available.
A small number of stakeholders highlighted the need to consider	Professional body/institute	Change	Action 1 under ‘What the Mayor will do to deliver change’ now contains reference to meanwhile

**Table 3.24: Issues raised by stakeholders in response to Chapter 5: Good Food Growing, Community Gardens and Urban Farming**

Main issue / suggestion	Stakeholder category	Recommended category of GLA response	Recommended change to strategy
<p><b>meanwhile spaces</b> for food growing in the London Food Strategy.</p>	<p>Local authority/political body</p> <p>Business/ business group</p>		<p>spaces for local food production, in line with the draft New London Plan.</p>
<b>Food supply and production</b>			
<p>A wide range of stakeholders were of the opinion that the Mayor should commit to supporting and increasing food growing in London's <b>green belt</b> through the London Food Strategy. Stakeholders highlighted the importance and potential significant opportunities for food production in the green belt.</p> <p>The importance of urban and peri-urban farming in <b>reducing food miles</b> and increasing London's resilience and sustainability –</p>	<p>Local authority/political body</p> <p>Food partnership</p> <p>Charity/non-profit organisation</p> <p>Author</p> <p>Business/ business group</p> <p>Other</p>	<p>Change</p>	<p>Reference to London's green belt has been added in the introductory narrative to chapter 5 and an additional action for Local Authorities to encourage appropriate food growing in the green belt has been added under 'Priorities to be led by external partners'.</p>

**Table 3.24: Issues raised by stakeholders in response to Chapter 5: Good Food Growing, Community Gardens and Urban Farming**

Main issue / suggestion	Stakeholder category	Recommended category of GLA response	Recommended change to strategy
particularly post-Brexit- were highlighted.			
<b>Skills and capacity building</b>			
A range of stakeholders highlighted the link between food growing and <b>volunteering, training and employment opportunities</b> . Some requested that the London Food Strategy go further by more clearly linking food growing to the Mayor's Skills agenda and committing resources to this area.	Community group Charity/non-profit organisation Business/ business group Local authority/political body	Change	An additional action has been added under 'What the Mayor will do to support change' which references training programmes that support people to set up enterprises and secure jobs in the food growing sector.

## Chapter 6: Good Food for the Environment

### Who responded

There were a large number of responses from stakeholders to Chapter 6, although not as many as for Chapters 1 and 2. Of those that responded, the top three categories were as follows.

**Table 3.25: Top three categories of respondents to Good Food for the Environment**

Category	Number of respondents
Charity/non-profit organisation	26
Local authority/political body	10
Business/ business group	12

### Main themes

The top five themes raised by stakeholders in relation to Chapter 6: Good Food for the Environment are included in **table 3.26**.

**Table 3.26: Top 5 themes raised in response to Chapter 6: Good Food for the Environment**

Theme	Number of responses
Food waste should be better utilised	32
Food businesses: supply chains, transportation and food miles	19
Food growing: should be increased locally	18
Environment: including packaging, plastics, utilisation of public land for food growing	18
Food security: there is a need for more sustainable local sources	14

### Summary of stakeholder consultation

#### **Summary of quantitative findings**

**Table 3.27: Talk London survey findings (non-representative) related to food and the environment**

- ‘Good food for the environment – ensuring the food industry has a positive environmental impact’ was listed as the 3<sup>rd</sup> out of 6 most important themes in the draft London Food Strategy.
- ‘Impact on the environment’, ‘food from ethical sources’, and ‘food from local sources’ were selected as the 3<sup>rd</sup>, 4<sup>th</sup> and 5<sup>th</sup> most important considerations respectively when deciding which food to buy from shops or supermarkets. ‘Food that is healthy’ is the most important consideration, with 75% of respondents to the Talk London survey selecting this.
- 78% of Talk London respondents currently try to reduce and recycle their food waste.

### Summary of qualitative findings

Focus groups explored Londoners’ views on environmentally-friendly and sustainable food (e.g. organic, free range, Fair-Trade food). Participants saw benefits in buying and eating environmentally-friendly and sustainable food, with the key ones being that they have better taste, quality, and health benefits (though there was some debate as to how much healthier sustainable food is). This was mostly raised when discussing organic food. Some respondents were concerned with the level of pesticides in food, which is an additional reason why they choose organic food.

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“I try to eat organic non- genetically modified food and drinks, less dairy, little meat, mainly veg, fruit, fish, grains, cereal.... I choose organic food and milk because I believe it is healthier to eat products that have not been sprayed with pesticides.” [Talk London respondent]

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However, from discussions focus group participants generally appeared to care more about the health impacts of food and less about the environmental impacts. For example, in focus groups, people talked about the use of pesticides but mostly mentioned the negative impact of pesticides on human health, not the consequences of pesticides entering rivers and damaging wildlife. A few mentioned other environmental concerns, including the carbon footprint of transporting food and deforestation to produce meat.

While some respondents care about animal welfare and how ethical food is (for example whether it is Fair Trade or free range), focus group participants overall do not think about this much when buying food. Even so, some do associate free range as being better quality and healthier. Focus group participants were not that concerned about whether food is sourced in the UK or not, though they associate more local food as being fresher and therefore better. There were some concerns

about non-EU food, particularly if it is cheap, mostly around distrust towards food content and labelling.

#### *4.2.1 Plastic packaging*

The main environmental concern among focus group participants was the use of plastics and the impact plastic has on the environment and wildlife (especially oceans, which some said they have become more aware of recently). As mentioned, this was a key consideration when buying food and a key complaint about using supermarkets. Reducing the use of plastics and buying items with less packaging appeared more common among focus group participants than other sustainable behaviours (e.g. buying organic or Fair-Trade food).

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“Recently there's a lot of stuff around the plastic in the sea and that really is disturbing.” [Focus group participant]

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Supermarkets and fast food restaurants are seen as the culprits when it comes to plastic waste. Many respondents think that supermarkets and fast-food outlets should reduce or eliminate all non-recyclable packaging on their products. Some also want facilities within supermarkets where customers can remove excess packaging, return plastic for reuse or bring re-usable containers to stock up on certain items (e.g. cereals, rice, pasta).

#### *4.2.2 Barriers to buying sustainable food*

While some respondents care about buying sustainable food, with many actively buying and prioritising sustainable food, this was not a priority among focus group participants overall. Whilst they see the benefits, they highlighted barriers to buying sustainable food. The main barrier is price, with many participants unable to afford more sustainable food or not thinking it is worth the extra cost. Availability, especially in convenience stores where organic ranges for examples can be limited, was also raised as a barrier. Lastly, some mentioned that organic food has shorter shelf lives which leads to more domestic food waste.

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“I've got no problem with buying organic or fair trade or sustainable food if the price is right.” [Focus group participant]

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#### *4.2.3 Food waste and recycling*

Londoners think about the environment or try to do their best when making food choices, with most recycling packaging or food waste where possible. Others buy

loose fruit or veg from local supermarkets to stay away from purchasing food in non-recyclable packaging. When it comes to food waste, some keep leftover food to be used the next day, whereas others put it in the food waste bin to be collected.

Many respondents believe that there should be a city-wide composting scheme available. It was noted that some boroughs do not have a compost service in-place. It is also difficult for those who live in flats with a shared communal garden. Some have had issues where bins have not been emptied, leaving them smelly, overflowing and easily accessible to foxes.

#### Summary of stakeholder consultation

Stakeholders raised a range of themes in relation to this chapter. These are summarised in **table 3.28** below.

<b>Table 3.28: Issues raised by stakeholders in response to Chapter 6: Good Food for the Environment</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
<b>General</b>			
Many stakeholders made the point that the <b>'What can you do'</b> box in this section focusses solely on food waste and should also reflect the need to encourage people to eat more sustainably.	Food partnership Author Local authority/ political body Charity/non-profit	Clarification	An additional suggestion has been added under 'What can you do' to encourage people to eat more sustainably.
A small number of stakeholders requested that the London Food Strategy should state that it <b>does not support fracking</b> in Greater London as it may have an impact on local food production.	Charity/non-profit	No change	Policy SI11 of the draft New London Plan states that development proposals for exploration, appraisal or production of shale gas via hydraulic fracturing should be refused and that the Mayor does not support fracking. It is considered that no further statement is



<b>Table 3.28: Issues raised by stakeholders in response to Chapter 6: Good Food for the Environment</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
			needed in the London Food Strategy relating to fracking.
<b>Farming and food supply</b>			
A range of stakeholders stated that chapter 6 is too focussed on carbon emissions and waste, and that the <b>impacts of farming and food supply on biodiversity, soil, water, pollinators etc.</b> should be explicitly referenced and addressed. A number suggested that the strategy should include an explicit statement on the type of farming and food supply that London seeks to promote and called for the Mayor to commit to a pesticide free London.	Charity/non-profit	Clarification and Change	<p>The narrative introducing this section has been updated to reference the impact of farming on biodiversity, soils and water.</p> <p>The definition of good food in the strategy has been updated to explicitly reference pesticide use and has been moved to the front of the document to make it more visible.</p> <p>Action 2 under ‘what the Mayor will do to support change’ has been updated to reference the impact on</p>

Table 3.28: Issues raised by stakeholders in response to Chapter 6: Good Food for the Environment			
Main issue / suggestion	Stakeholder category	Recommended category of GLA response	Recommended change to strategy
			food on the soils, biodiversity and water as well as on climate change.
A small number of stakeholders recommended that the <b>resilience and fairness</b> of wider food chains should also be referenced and addressed, such as supporting Fairtrade accredited products.	Charity/non-profit	Change	<p>Further references to the definition of good food have been included in this chapter. This definition explicitly promotes Fairtrade accredited products.</p> <p>In addition, an action has been added under ‘what the Mayor will do to deliver change’ which states that sustainably and ethically sourced food will be promoted across the GLA group.</p>
<b>Food security and resilience</b>			

**Table 3.28: Issues raised by stakeholders in response to Chapter 6: Good Food for the Environment**

Main issue / suggestion	Stakeholder category	Recommended category of GLA response	Recommended change to strategy
<p>Stakeholders expressed a range of views in relation to London’s <b>food security and resilience</b>. Some were of the view that given the scope of this issue, the limitations of the GLA’s Food Team and London Food Board should be made clear in the strategy. Others felt that there should be more or even total focus in the strategy on how London will be fed in the future and would respond to shocks to the supply chain.</p>	<p>Charity/non-profit Business/ business group Food partnership Local authority/ political body</p>	<p>Clarification</p>	<p>The London Food Board and officers working on the GLA’s food programme do not have the capacity or expertise to lead on work relating to resilience of the food system.</p> <p>Additional wording has been added to the narrative which states that whilst we need to learn more about London’s food resilience, the responsibility of planning for such events is down to multiple parties.</p>
<b>Sustainable diets and procurement</b>			
<p>A range of stakeholders stated that the GLA Group should lead by example by using its <b>procurement powers</b> to encourage locally, sustainably-produced and ethically sourced food, increase the proportion of</p>	<p>Local authority/political body</p>	<p>Change</p>	<p>An additional action has been added under ‘What the Mayor will do to deliver change’ which references</p>

<b>Table 3.28: Issues raised by stakeholders in response to Chapter 6: Good Food for the Environment</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
plant-based ingredients, decrease the use of livestock products and reduce food waste.	Charity/non-profit		the GLA Group leading by example by sourcing sustainable and ethically sourced products.
Many stakeholders highlighted the need for chapter 6 to promote <b>sustainable diets</b> , particularly increasing a shift towards more plant-based food and organic food and less meat consumption,	Community group Business/business group Healthcare provider/body Educational organisation Local authority/political body Author	Clarification and change	An additional action has been added under 'what can you do' in chapter 6 to encourage people to buy and eat good food.  An additional action has been added under 'priorities to be led by external partners' stating that businesses, local authorities and other public-sector bodies should increase the amount of local, seasonal and sustainable food they buy, and measure their progress on achieving a better balance of plant-

<b>Table 3.28: Issues raised by stakeholders in response to Chapter 6: Good Food for the Environment</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
	Food partnership  Professional body/institute		based food compared to meat and dairy.  Annex 2: Our definition of good food, which includes organic food, has been moved to the front of the document to ensure it is more visible.
<b>Food waste and redistribution</b>			
A range of stakeholders advised that the Mayor should do more to <b>prevent food waste</b> before encouraging recycling and redistribution, in line with the Food Waste Hierarchy. A small number of stakeholders advised that the Mayor should sign up as a Champion for <b>Sustainable Development Goal 12.3</b> and aim for a 50 per cent reduction in food waste by 2030.	Local authority/political body  Charity/non-profit organisation  Professional body/institute	Change	In line with the Mayor's London Environment Strategy, action 1 under 'What the Mayor will do to deliver change' has been updated:  'As set out in the London Environment Strategy, set a 50 per cent reduction of food waste target by 2030

<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
			<p>and become a Champion of Sustainable Development Goal 12.3.’</p> <p>Reference to following the waste hierarchy and the need to prevent food waste as a priority have also been included in the introductory narrative to chapter 6.</p>
<p>Several stakeholders expressed their support for <b>food waste recycling</b> and recommended that all London boroughs should be encouraged to collect food waste.</p>	<p>Professional body/institute</p> <p>Local authority/political body</p> <p>Food partnership</p> <p>Charity/non-profit organisation</p>	No change	<p>Action 3 under ‘What the Mayor will do to support change’ has been updated:</p> <p>‘In line with the London Environment Strategy, encourage local authorities to offer better waste recycling services across London, including separate food waste collections, to help meet the 65 per cent</p>

Table 3.28: Issues raised by stakeholders in response to Chapter 6: Good Food for the Environment			
Main issue / suggestion	Stakeholder category	Recommended category of GLA response	Recommended change to strategy
			overall municipal waste recycling target by 2030.'
Some stakeholders felt that <b>business food waste</b> needs to be better addressed and businesses either incentivised or required to recycle their food waste.	Food partnership  Charity/non-profit organisation	No change	The Mayor has limited influence over business food waste. Action 5 under 'what the Mayor will do to deliver change' sets out how the Mayor will work with businesses on food waste.  Further information is also included in the London Environment Strategy.
A range of stakeholders highlighted the issue of <b>single use plastic</b> and recommended that actions on reducing plastic waste in the London Food Strategy are strengthened. A number stated that it is not only plastic water bottles that need to be reduced, but all types of plastic.	Business/business group  Local authority/political body	Change	The Mayor is committed to reducing single-use plastic. Action 3 under 'What the Mayor will do to deliver change' has been strengthened to include

<b>Table 3.28: Issues raised by stakeholders in response to Chapter 6: Good Food for the Environment</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
	<p>Educational organisation</p> <p>Charity/non-profit organisation</p> <p>Food partnership</p>		<p>reference to reducing single-use plastics.</p> <p>In addition, action 4 under ‘what the Mayor will do to deliver change’ in Chapter 3 of the London Food Strategy: Good Food in Community Settings and Public Institutions has been updated to include further reference to single use plastics in the GLA Group.</p>
<p>Although stakeholders were supportive of actions around <b>food redistribution</b> and requested that redistribution is further supported in the strategy – including through better technology - a number requested that it is made clear in the London Food Strategy that redistributing surplus food is not the solution to food poverty and insecurity.</p>	<p>Charity/non-profit organisation</p> <p>Community group</p> <p>Local authority/political body</p>	<p>Clarification</p>	<p>It is recognised that the redistribution of surplus food is not the solution to food poverty and insecurity.</p> <p>Chapter 1 of the London Food Strategy includes actions that will help to address these issues in</p>



<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
			London. Additional wording has been added to action 3 under 'Priorities to be led by external partners' in Chapter 6 of the London Food Strategy making explicit reference to this.

### Integrated Impact Assessment

An Integrated Impact Assessment (IIA) of the draft LFS was commissioned from Temple Group.

Even though the London Food Strategy is not a statutory document and therefore not legally required to have an IIA undertaken, the GLA decided to undertake an IIA to inform its development. This is so that the overall effects of the draft LFS could be considered when developing the final document.

The IIA assessed the potential environmental, social and economic impacts of the draft LFS using a framework developed by the GLA. The IIA report was published for a four-week period alongside the draft LFS and comments were invited from stakeholders.

#### Comments on the IIA of the draft LFS

Only one stakeholder commented on the IIA of the draft LFS. This comment along with the GLA’s response is included in **table 3.29** below.

<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>
It is positive that an Integrated Impact Assessment was conducted. We note however that whilst there is a lot of attention on ‘healthy food’ in the strategy, there was little attention given to health in the impact assessment. We would welcome this being addressed to ensure that the Strategy prioritises those actions that will provide the biggest health gain.	Healthcare provider/ body	No change	<p>Health and health inequalities is one of the key IIA objectives that the actions in the draft LFS was assessed against.</p> <p>The IIA assessed the draft LFS as likely to have a minor positive contribution to improving health outcomes and reducing health inequalities particularly over the longer term with the potential for this to become a major contribution.</p> <p>Further actions have been included in the final London Food Strategy to ensure it has the biggest health gain.</p>

<b>Table 3.29: Comments raised in relation to the IIA of the draft LFS</b>			
<b>Main issue / suggestion</b>	<b>Stakeholder category</b>	<b>Recommended category of GLA response</b>	<b>Recommended change to strategy</b>

A separate post adoption statement summarises the recommendations in the IIA of the draft LFS and how these have been taken into account in the final version of the London Food Strategy.

# Conclusions and recommendations

This report is the analysis of the issues raised during the public and stakeholder consultation of the draft London Food Strategy. It contains GLA officers' recommendations for changes to the text of the strategy for the Mayor's consideration. Based on consultee feedback, these are primarily clarifications and minor amendments to the strategy, rather than major changes to the structure of or actions in the strategy.

Copies of all stakeholder representations have also been made available to the Mayor.

The final strategy is intended to provide an overarching framework for healthy and sustainable food for London up to 2028. It is a non-statutory document which sits alongside the range of other statutory and non-statutory Mayoral strategies. Many of these also contain actions and policies which will contribute to ensuring all Londoners have access to healthy and sustainable food. Many of the issues raised during the consultation are more appropriate to these documents and have been passed on to those teams that are writing and reviewing those documents.

In considering the issues, and making recommendations to the Mayor, the GLA has been mindful of the remit of the strategy and sought to focus on the issues relevant to the actions included in it. This report is intended to provide the Mayor with the information needed to understand the range of issues raised by respondents and decide on the final text of the strategy for its approval and publication.

# Next steps

After considering all comments from the public and stakeholders, the London Food Strategy will be finalised and approved by the Mayor.

The final London Food Strategy will be published on the Mayor of London website, London.gov.uk alongside an Implementation Plan. This Implementation Plan will set out the actions that the Mayor will prioritise between 2018 and 2023 to help implement the actions set out in the strategy. It will also provide delivery timescales and information on how progress will be measured and reported on. The Implementation Plan will be updated every two years to reflect the successive and cumulative London-wide activity required to achieve many of the strategy's longer-term objectives.

Delivery of the strategy will be overseen by officers working on the GLA's Food Programme working closely with London Food Board. The London Food Board (LFB) consists of 17 individuals who advise the Mayor of London and the GLA on the food matters that affect Londoners. Membership is made up of leaders from sectors spanning the breadth of the food system who reflect the diversity and dynamism of London.

# Abbreviations

Abbreviation	Full term
BAME	Black and Ethnic Minority
DHSC	Department of Health and Social Care
EU	European Union
GCSE	General Certificate of Secondary Education
GLA	Greater London Authority
HFSS	High in Fat, Salt or Sugar
HND	Higher National Diploma
HSL	Healthy Schools London
IIA	Integrated Impact Assessment
LFS	London Food Strategy
OFSTED	Office for Standards in Education
SDG	Sustainable Development Goal
TfL	Transport for London
UK	United Kingdom
UNICEF	United Nations Children’s Fund

# Glossary

Term	Definition
Boroughs	Usually used to refer to all 32 London boroughs and the City of London. The boroughs are the principal local authorities in London and are responsible for running most local services in their areas, such as schools, social services, waste collection and roads.
Channel	The online platform used to share information about the draft strategy, for example a website, social media account, etc.
Child obesity	A condition in which a child has an abnormally high amount of body fat. It is measured by comparing a child's Body Mass Index (BMI) with the population average, taking into account the child's age, sex and height.
Climate change	A large-scale, long-term shift in the planet's weather patterns or average temperatures. Characterised by higher temperatures, sea level rise, changing rainfall, and more frequent and severe extreme weather.
Diversity	Recognising, respecting and valuing a wide set of differences and understanding that the opportunities we get are impacted by characteristics beyond those protected by legislation like class, family background, political views, union membership etc.
Early years	The period from a child's birth through to the age of five years old.
Early years settings	Establishments which offer provision to the 0-5 age group; e.g. childminders, crèches, nurseries, children's centres, nursery schools and schools with nurseries.
Food insecurity	The state of a person or household being, or at risk of being, without reliable access to a sufficient quantity of affordable, nutritious food.

Term	Definition
Food system	A catch-all term for the way food works for Londoners and businesses. It includes the contribution of food businesses to London's economy, the role of the built food environment which Londoners experience (e.g. lack of access to healthy food, widely visible unhealthy advertising, London's varied food cultures), and the contribution of food to Londoners' health, amongst many other things.
Greater London	The geographical area encompassed by the 32 London boroughs and the City of London.
Greater London Authority	The top-tier administrative body for Greater London, consisting of a directly elected executive Mayor of London and an elected 25-member London Assembly with scrutiny powers.
Green infrastructure	The network of parks, green spaces, gardens, woodlands, rivers and wetlands (as well as features such as street trees and green roofs) that is planned, designed and managed to: promote healthier living; lessen the impacts of climate change; improve air quality and water quality; encourage walking and cycling; store carbon; and, improve biodiversity and ecological resilience.
Health inequalities	Health inequalities are systematic, avoidable and unfair differences in mental or physical health between groups of people. These differences affect how long people live in good health and are mostly a result of differences in people's homes, education and childhood experiences, their environments, their jobs and employment prospects, their access to good public services and their habits.
Healthy Early Years London	An awards scheme funded by the Mayor of London that supports and recognises early years setting achievements in child health, wellbeing and readiness for school.
Healthy Schools London	An awards scheme funded by the Mayor of London that supports and recognises school achievements in pupil health and wellbeing. HSL focuses on the whole child and gives schools a framework for their activity with pupils, staff and the wider community. HSL promotes a whole school approach across four themes: healthy eating, physical



Term	Definition
	activity, emotional health & wellbeing and Personal Social Health Education (PSHE) <a href="http://www.healthyschools.london.gov.uk/">www.healthyschools.london.gov.uk/</a>
HFSS	HFSS products are food and soft drink products that are high in fat, salt or sugar as identified by the Department of Health's nutrient profiling model.
Impressions (social media)	The number of times a tweet or Facebook post, for example, is displayed in someone's feed or timeline. This is regardless of whether a user liked, retweeted or commented on it.
Londoners	Permanent and temporary residents of London and, where also applicable, commuters from outside London, visitors and tourists.
London Environment Strategy	This document brings together approaches to every aspect of London's environment to help tackle a host of environmental challenges including toxic air, noise pollution, the threat to our green spaces, and the adverse effects of climate change which all pose major risks to the health and wellbeing of Londoners.
London Health Inequalities Strategy	The London Health Inequalities Strategy is a statutory strategy, published by the Mayor of London (September 2018). The Strategy outlines the main issues that lead to inequalities in the health of different groups of Londoners, and sets out his plans to tackle these unfair differences in health. It outlines the Mayor's role, as well as the roles of other organisations, and where there are opportunities to work together to create a city where nobody's health suffers because of who they are or where they live.
London Living Wage	The London Living Wage is an hourly rate of pay calculated to give a worker in London and their family enough to afford the essentials and to save. At the date of this publication, the London Living Wage is £10.20. The rate is calculated annually by the Resolution Foundation and overseen by the Living Wage Commission, based on the best available evidence about living standards in London.

Term	Definition
London Plan	The Mayor’s Spatial Development Strategy for London.
Mayor’s Transport Strategy	The Mayor’s 25-year plan for London’s transport system. This plan guides Transport for London and London boroughs in their transport policies and investments.
Pageviews	A record of every time a page is viewed. A single user can visit a page any number of times (during the same session) and each time will count as a pageview.
Older people	Refers to people over 50, but also recognises that those above retirement age and those over 70 may have particular requirements that need to be addressed.
Overweight	People with a Body Mass Index (weight in relation to height) which is higher than is considered healthy
Peri-urban	Peri-urban areas result from the process of peri-urbanisation. They can be defined as a zone where urban and rural uses mix and often clash.
Poverty	Defined relative to the standards of living in a society at a specific time. People live in poverty when they are denied an income sufficient for their material needs and when these circumstances exclude them from taking part in activities that are an accepted part of daily life in that society.
Public Health England	An executive agency of the Department of Health. It exists to protect and improve the nation’s health and wellbeing and reduce health inequalities.
SME (Small or Medium Sized Business)	A small business is one that has a turnover of not more than £6.5 million, a balance sheet total of not more than £3.26 million and not more than 50 employees. A medium-sized company has a turnover of not more than £25.9 million, a balance sheet total of not more than £12.9 million and not more than 250 employees.
Social prescribing	A way of linking people to sources of support within the community. It is mainly used by GPs, nurses and other health care professionals to refer people to a range of non-clinical services and activities in the community to address

Term	Definition
	people’s social, financial or emotional needs. For example, social prescriptions for food can be used to tackle hunger and malnutrition for those living in food poverty, while for a community cooking class or community kitchen might address social isolation and/or enhance cooking skills.
Sugar Smart	A national campaign run by Sustain and Jamie Oliver which encourages public, private and third sector organisations to sign up and pledge to help reduce the amount of sugar we all consume. Local authorities, schools, hospitals, businesses and community groups that have signed up are taking a range of actions from promoting free drinking water to banning price promotions on sugary foods and drinks.
Waste	Any substance or object which the holder discards, intends to discard or is required to discard. Food waste or food loss is food that is discarded or lost uneaten. The causes of food waste or loss are numerous, and occur at the stages of production, processing, retailing and consumption.

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# Appendices

**Appendix 1: Example of the ‘Destination Junk Free London’ campaign email template received as part of the draft LFS consultation**

Dear Sadiq Khan,

I’m writing in support of your proposal to ban advertising of junk food and sugary drinks across the Transport for London network.

I’m really pleased that you’re proposing this bold world-leading action as part of your draft London Food Strategy which includes a wide range of plans to tackle child obesity and diabetes and help create a better food culture for a happier, healthier London.

Yours sincerely

**Appendix 2: Summary of events held during the consultation period**

Date	Event / Meeting title	Event/meeting organiser
Meetings and events to discuss the strategy as a whole		
16 May 2018	Capital Growth Working Group	Sustain
15 May 2018	Urban Food Heroes event	Sustain
22 May 2018	TRiFOCAL business working group	WRAP
25 May 2018	London Markets Board	Greater London Authority
25 May 2018	Obesity Action Campaign Conference	Obesity Action Campaign
30 May 2018	GLA staff lunchtime presentation	Greater London Authority
4 June 2018	Islington Food Poverty Action Plan consultation event	London Borough of Islington
11 June 2018	Greenwich Food Partnership meeting	Greenwich Food Partnership
12 June 2018	Healthier Catering Commitment Steering Group	Association of London Environmental Health Managers
13 June 2018	London Food Board Boroughs Group	Greater London Authority
14 June 2018	Good Food Lewisham network meeting	Good Food Lewisham
14 June 2018	London Assembly Environment Committee	London Assembly
15 June 2018	London Food Board	Greater London Authority
20 June 2018	Food Secure Barnet Summit	Barnet Council
20 June 2018	London's Healthy Place Network	Southwark Council
21 June 2018	Chef's Manifesto – London Action Hub launch	SDG2 Advocacy Hub
21 June 2018	Child Obesity Taskforce	Greater London Authority
21 June 2018	Sugar Smart Hackney Youth Debate	Sugar Smart Hackney

Date	Event / Meeting title	Event/meeting organiser
25 June 2018	London Obesity Leads Network	Association of (London) Directors of Public Health
26 June 2018	Annual Sustainable Food Cities Conference	Soil Association
27 June 2018	Food Thinkers Seminar	City University
28 June 2018	C40 Food Systems Network webinar	C40
<b>Meetings to discuss the proposed ban on unhealthy food advertising on the TfL estate</b>		
11 May 2018	Outsmart - Out of home advertising trade body meeting	TfL
4 June 2018	McDonalds meeting	TfL
5 June 2018	Ocean Outdoor meeting	TfL
6 June 2018	Kinetic meeting	TfL
11 June 2018	Incorporated Society of British Advertisers (ISBA) meeting	TfL
19 June 2018	Advertising Standards Agency (ASA) meeting	TfL
20 June 2018	Exterior Media meeting	TfL
20 June 2018	Just Eat meeting	TfL
2 July 2018	Clear Channel meeting	TfL
9 July 2018	Institute of Practitioners in Advertising (IPA) meeting	TfL
27 July 2018	Mayor's Advertising Steering Group	TfL

### Appendix 3: List of stakeholder organisation respondents

A total of 149 stakeholder responses were received. These were from individual organisations as well as responses from groups of organisations and from networks and representative bodies. A list of organisations and networks/representative bodies/membership organisations is below.

#### Individual Organisations

- Alexandra Rose Charity
- Author – Hungry City
- Barnet Council
- Barnet Green Party
- Beautiful Ornate Pieces Ltd
- Be Enriched
- Birmingham Food Council
- Borough Market
- CADA Design
- Cancer Research UK
- Charlton Manor Primary School
- Children and Young People’s Nutrition Trust
- C40
- City of London Corporation - Health and Wellbeing Board
- City of Toronto
- Clear Channel UK Ltd
- Coeliac UK
- Compassion in World Farming
- Cordwainers Grow CIC
- Covent Garden Market Authority
- Crop Drop Limited
- Croydon Council
- Diabetes UK
- Dominos
- Everyday Gourmet Gadgets Ltd
- Fairtrade Foundation
- Egbe Omo Ikale
- Exterion Media UK Limited
- Fareshare UK
- First Steps Nutrition Trust
- Flavour School
- FoodCycle
- Food Consultant (Mel Singh)
- Food Ethics Council
- Food Exchange
- Food Foundation
- Food Research Collaboration
- Fruit Magpie
- Garden Organic - Henry Doubleday Research Association
- Groundwork London
- Growing Communities
- Haringey Council
- Harrow Council
- HENRY – Health, Exercise, Nutrition for the Really Young
- HENRY Waltham Forest
- Healthy London Partnership
- hep. istanbul vienna
- iHEA Special Interest Group on the Economics of Obesity
- Innocent
- Institute of Alcohol Studies
- Jamie Oliver Limited
- JC Decaux
- Justainability Ltd
- Just Eat
- Karma - Good Food Shouldn't Be Wasted
- KFC
- Kinetic Worldwide
- Lidl UK
- Lewisham Council
- Living Wage Foundation
- London Assembly
- London Assembly Labour Group



- London Assembly Member – Liberal Democrats
- London Borough of Barking and Dagenham
- London Borough of Hounslow
- London Borough of Redbridge
- London Borough of Southwark
- London Borough of Sutton
- London Borough of Tower Hamlets
- London Wildlife Trust
- Loughborough Farm
- Lucozade Ribena Suntory
- Made in Hackney
- Maida Hill Place
- Mayor's Cultural Leadership Board
- McDonalds
- Middlesex University
- My Time Active
- Natural Hydration Council
- Nuffield Council on Bioethics
- NYC Foodscape
- Outdoor Plus
- Pepsico UK
- Plant-based health professionals UK Ltd
- Primesight Limited
- Public Health England (London)
- Reducetarian Foundation
- Registered Dietitian
- Royal Borough of Greenwich
- RSPCA Assured
- School Food Matters (plus two endorsements from SFM Trustees)
- Slow Food in the UK
- Soil Association
- St Georges Hospital University Trust
- Subway
- Sugar Smart Hackney
- Sunjash Rahman Ltd
- Sustainable Fish Cities
- Sustainable Food Cities
- Talon Outdoor
- Taxi Media
- The Centre for Sustainable Manufacturing and Recycling Technologies
- Traycees Food Fashion
- Trees for Cities
- Uber Eats
- Ubiquitous Ltd
- UK Government Chemist
- Unicef UK Baby Friendly Initiative
- Water for London
- World Breastfeeding Trends Initiative UK

### **Joint responses**

- ASA System (Advertising Standards Agency, Committee of Advertising Practice, Broadcast Committee of Advertising Practice)
- Camden and Islington Public Health Directorate, Camden Health and Wellbeing Team and Islington Health and Wellbeing Team

### **Networks/representative bodies/membership organisations**

- Advertising Association
- African Heritage Group
- Alliance to Save our Antibiotics
- Association of Convenience Stores
- Association of Association of London Environmental Health Managers (ALEHM)
- Association of Breastfeeding Mothers

- Breastfeeding Network
- British Medical Association
- British Soft Drinks Federation
- British Takeaway Campaign
- Community Food Growers Network
- Dairy UK
- Dental Public Health Group
- Federation of London Local Dentist Committees
- Food and Drink Federation
- Global Aquaculture Alliance
- Good Food in Greenwich
- Good Food Lewisham
- Hackney Food Partnership (HFP)
- IPA
- ISBA
- Islington Food Strategy
- Just Space
- Lambeth Staying Healthy Partnership
- London Councils
- London Farmers' Markets
- London Healthy Place Network
- London Infant Feeding Network
- Obesity Health Alliance
- Outsmart
- Royal College of Physicians
- Royal Society for Public Health
- Sustain/London Food Link
- Sustainable Food City Partnership Aberdeen
- Sutton Food Forum
- The Mayor's Cultural Leadership Board
- UK Hospitality
- Women's Environmental Network

## Appendix 4: Draft LFS consultation questions

Six consultation questions were included in the draft LFS (page 7). As stated in the draft LFS, these questions were intended as a guide and respondents didn't have to answer them all or be limited by them in their responses. These questions were:

1. Are the six priority areas the right ones? Are there other priorities that should be considered?
2. Are the most effective actions the Mayor, external stakeholders and individuals can take set out? Are there other actions that should be included?
3. What are your views on the proposed ban of advertising of food and drink that is not healthy across the Transport for London estate?
4. What are you or your organisation doing to support good food in London? What best practice already exists in the priority areas?
5. How could you or your organisation support the Mayor to do more to achieve good food for London and pledge to support the final strategy?
6. Is the strategy inclusive and does it consider the needs and priorities of all Londoners?

For the purposes of the online survey these questions were further broken down to make analysis of responses easier. Respondents were also asked to state the name and type of organisation they were representing. The online survey questions were:

- 1a. Are the six priority areas the right ones (Yes/No)?
- 1b. If no, please tell us why.
- 2a. Are there other priorities that should be considered (Yes/No)?
- 2b. If yes, please tell us what they are.
- 3a. Are the most effective actions the Mayor, external stakeholders and individuals can take set out (Yes/No)?
- 3b. If no, please tell us why.
- 4a. Are there other actions that should be included (Yes/No)?

4b. If yes please tell us what they are.

5a. Do you agree with the proposed ban of advertising food and drink that isn't healthy across the Transport for London network (Yes/No)?

5b. Please tell us why

6. What are you or your organisation doing to support good food in London? What best practice already exists in the priority areas?

7. How could you or your organisation support the Mayor to achieve good food for London and support the final strategy?

8a. Is the strategy inclusive and does it consider the needs and priorities of all Londoners (Yes/No)?

8b. If no, please tell us why.



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**Public Liaison Unit**

Greater London Authority  
City Hall  
The Queen's Walk  
More London  
London SE1 2AA

Telephone **020 7983 4000**

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