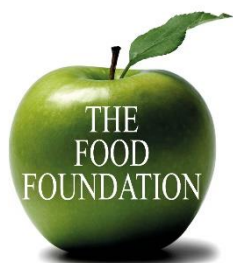




Policy Options to Create a Healthy Food Economy in Birmingham

Prepared by the Food Foundation for Birmingham Public Health

March 2020



Executive Summary

Birmingham is a young, diverse and growing city, and has a thriving and exciting ‘food scene’ in parts. However, it also suffers higher than average unemployment, contains some of the poorest areas in the country, and childhood obesity in Birmingham is above the national average. One in four children leave school experiencing obesity and there is higher prevalence among lower income groups. The food environment in Birmingham provides ready access to unhealthy food that is convenient and affordable; 30% of all food outlets in Birmingham are takeaways (compared to 26% in England).

This report summarises an audit the Food Foundation conducted for Birmingham Public Health on the extent to which their existing policies and programmes are creating a healthy food economy in the city. It will demonstrate that healthy food is not yet an overarching priority for Birmingham City Council, but making this a focus could help promote community cohesion, create employment opportunities, attract tourists and reduce diet related-ill health (which would in turn strengthen the economy and reduce dependency on services).

Improving the food environment and reducing risk of diet related ill-health will help councils to fulfil their statutory duties as laid out in the *Health and Social Care Act 2012*. All local authorities in England have a duty to “take appropriate steps to improve the health of people who live in their areas,” which can include “providing assistance to help individuals minimise risks to health arising from their accommodation or environment.”(1) The food environment is a driving factor in poor diets, obesity and diet-related diseases (2,3), and taking steps to create a healthy food economy will help minimise the risk for citizens.

The audit was conducted from June-September 2019. Based on existing evidence we created a conceptual framework showing the outcomes and policy outputs needed for a Birmingham to have a ‘Healthy Food Economy’ and then used this framework to create an audit tool. To complete the audit, we interviewed 18 officials in Birmingham City Council and in a variety of other agencies and settings that have oversight and leadership on the food environment across the city and conducted a desk review of published documents and policies.

Birmingham is starting from a reasonably strong position in its ambition to establish a Healthy Food Economy. The city planning policy to restrict hot food takeaways demonstrates strong commitment that other cities have been learning from. There are also some advertising restrictions on council owned or managed estates (though attempts to apply stricter standards have faced difficulty), a number of settings use the Government Buying Standards for food procurement, and the city is working to increase the uptake of the Healthy Start scheme. The coordinated approach taken with early years services has demonstrated an efficient way to make use of limited resources. Birmingham was an initial pledger to the Peas Please initiative, signatory to the Milan Urban Food Policy Pact, and has established a learning partnership on food policy with Pune, India. The city has also recently established the Creating a Healthy Food City Forum and launched a programme of citizen engagement on food, both of which are important steps towards delivering a Healthy Food Economy.

The interviews conducted for this audit focused on how to build on the existing good work happening in Birmingham, and identify areas where action is needed. The key policy gaps and opportunities emerging from the policy audit include:

- The Council should set a city-wide plan or Act for healthy food – similar to the Clean Air Act – to provide authority and direction for delivering a healthy food economy in the city.

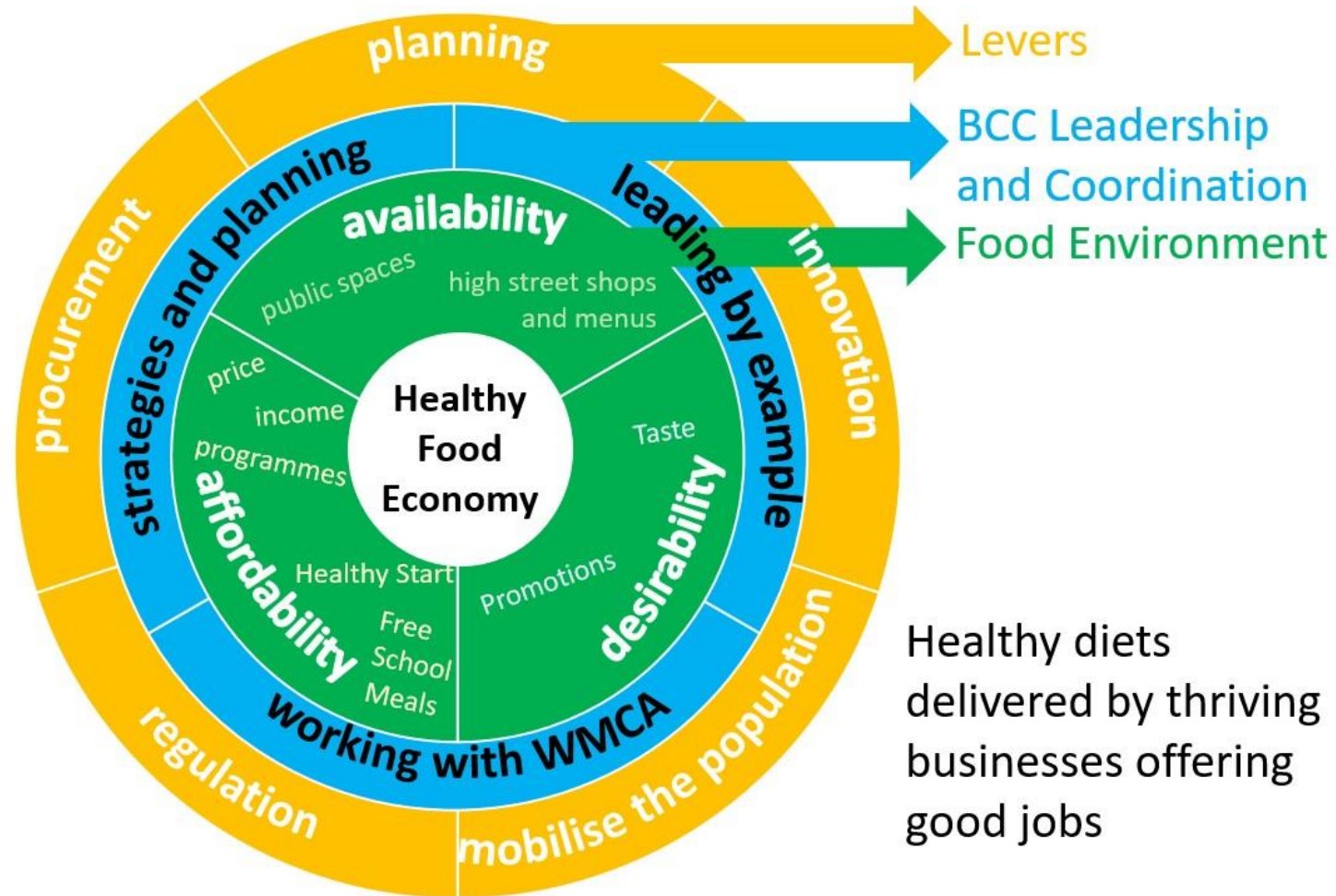
- Included within the city-wide healthy food plan should be a funded programme of work that draws together departments in the Council working on public health, environmental health and business innovation to build on existing initiatives and explore new routes to encourage healthy food businesses in the city.
- The Council should strengthen existing programmes targeting children including through additional capacity for the food schemes delivered by the coordinated early years services, increasing uptake of the healthy start scheme, increasing uptake of free school meals, ensuring free school meals are provided to all who need them, including children with no recourse to public funds, and scoping a mechanism for ensuring compliance to school meal standards.
- The Council should lead by example by going beyond the Government Buying Standards and further improving the health and sustainability of the food offering in BCC buildings
- The Council and city planners have an opportunity to build on the success of the hot food takeaway restriction and incorporate more food issues into planning policy via supplemental planning documents and in the next revision of the city plan. The gaps identified in the audit include a health checklist for planning applications, policies to protect healthy food businesses and re-purposing land or sites for food growing and food start-ups. This would also include scoping ways of strengthening the restrictions on hot food takeaways, particularly around schools.
- The Council has attempted to place advertising restrictions on unhealthy food but subsequently faced challenges in securing an advertising contract. Working together with other Local Authorities, the Council has an opportunity to influence national advertising regulations to make city-level restrictions easier to implement.

Compared to the scale of the challenge, the city needs to take much further and wide-reaching action to improve the healthfulness of the food economy. Implementing these recommendations will shift the priority given to healthy food in the Council, mark a significant the step towards more coherent cross-council action on healthy food and draw new healthy food businesses into the city.

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Conceptual Framework



Summary of Audit Findings by Conceptual Framework Themes

Strategies and Plans

Structures in place	Policy gaps and opportunities
<ul style="list-style-type: none"> Establish a local council/commission/ coordinating group/task force- <i>emerging</i> Local authority Declaration on Healthy Weight or Local Government Declaration on Sugar Sign up to relevant international and national campaigns and pacts UNICEF UK Baby Friendly Initiative 	<ul style="list-style-type: none"> City wide food plan Local authority Declaration on Healthy Weight or Local Government Declaration on Healthier Food Include healthy food access and food poverty in other strategies/plans Work with the environmental health team

Leading by example

Structures in place	Policy gaps and opportunities
<ul style="list-style-type: none"> Adopt policies and procedures in city council owned and operated settings to lead by example- <i>emerging</i> Visible political leadership on food policy Advertising restrictions on City Council estates/locations with Council authority- <i>partial</i> Implement the (real) living wage for all staff/contractors Healthy food in BCC canteens- <i>partial</i> 	<ul style="list-style-type: none"> Support women returning to work at the City Council to breastfeed, express and store breastmilk Incorporate more food issues into new culture change programme for employees Strategy for healthier food procurement

Promoting Innovation

Structures in place	Policy gaps and opportunities
<ul style="list-style-type: none"> Facilitate the use of derelict land or buildings for growing spaces/healthy food businesses (also links with planning actions above)- <i>emerging</i> Set a target for reducing food waste across the city Incorporate food waste reduction into all relevant policies (e.g. procurement policies described above)- <i>partial</i> Explore establishing a local food innovation hub to support new healthy food businesses 	<ul style="list-style-type: none"> Use economic/tourism policies to support a healthy food economy Business rate relief for healthy/sustainable start up food businesses Support businesses through urban food awards

Use regulatory and legislative levers

Structures in place	Policy gaps and opportunities
<ul style="list-style-type: none"> Work with NHS trusts to develop and maintain a healthy food strategy- <i>partial</i> Increase the uptake of healthy start and encourage more retailers to accept the vouchers Restrict advertising of unhealthy food- <i>emerging</i> Happy Healthy Holidays programme HENRY Start Well BUMP 	<ul style="list-style-type: none"> Put in place whole-school food policies Increase uptake of free school meals Scope a mechanism for ensuring adherence to school meal standards Protect and promote children's centres Create welcoming environments for breastfeeding in public places Support breastfeeding women across the city returning to work to breastfeed, express and store breastmilk Connect work on healthy food with environmental health regulations



Procurement

Structures in place	Policy gaps and opportunities
<ul style="list-style-type: none"> Adopt healthy and sustainable food procurement policies, covering: <ul style="list-style-type: none"> School Meals Local authority staff canteens- <i>partial</i> Local authority events- <i>partial</i> 	<ul style="list-style-type: none"> Adopt healthy and sustainable food procurement policies, covering: <ul style="list-style-type: none"> Community meals Food at leisure centres Local authority owed care homes Work with Health and Wellbeing board(s) to encourage CCGs and NHS Trusts to take up the hospital food commissioning for quality and innovation framework (CQUIN)

Mobilising the population

Structures in place	Policy gaps and opportunities
<ul style="list-style-type: none"> Establish on-going citizen engagement mechanisms on healthy food policy Promote the (real) living wage to local employers and suppliers- <i>emerging</i> 	<ul style="list-style-type: none"> Business rate reductions to businesses signing up to the living wage Work with partners to expand existing social prescribing scheme for fruit and veg, referrals to growing schemes, etc.



Planning

Structures in place	Policy gaps and opportunities
<ul style="list-style-type: none"> Supplementary planning documents restrict development of hot food takeaways Making community assets available to support food production – allotments, edible landscapes, repurposing green/brownfield sites, promoting food growing in new housing developments- <i>partial</i> 	<ul style="list-style-type: none"> Create a health/sustainability checklist for planning applications Use section 106 agreements to require financial agreements from hot food takeaways to support obesity/healthy food programmes Specify food shops as essential retail in the Local Plan to restrict change of use applications License/control street trading of unhealthy food Community infrastructure levies are used to contribute toward infrastructure needed to create a healthy food economy

Working with West Midlands Combined Authority

Structures in place	Policy gaps and opportunities
<ul style="list-style-type: none"> Work in partnership with WMCA in areas they have authority- <i>partial</i> Advertising restrictions on the transport network- <i>partial</i> 	<ul style="list-style-type: none"> Collaborating to create a healthy food economy 'Thrive at Work' programme could have a greater focus on healthier food

Scale of the Challenge

Birmingham is a young, diverse and growing city, with population forecast to rise by 300,000 within 15 years. It is the youngest city in Europe, with an average age under 30 and by 2020 its population will be more than 50% black and ethnic minority. The city has a growing service and high-tech manufacturing base but suffers higher than average unemployment and also contains some of the poorest areas in the country. More than one-third (37 per cent) of Birmingham children live in poverty, with many affected by welfare cuts. Birmingham is the sixth most deprived English district but poverty is also highly concentrated in parts of the city, leading to wide disparity in life expectancy (4).

Childhood obesity in Birmingham is above the national average (see Table 1). One in four children leave school experiencing obesity and there is higher prevalence among lower income groups. In some wards such as Handsworth, Hodge Hill and Washwood Heath almost half of all children are living with overweight or obesity (see Figure 1). The prevalence of diabetes among adults is also higher in Birmingham than the rest of England (8.4% versus 6.9%)(5).

Table 1. Childhood obesity, 2018-19.

	Birmingham	England
Reception	11.4%	9.7%
Year 6	25.7%	20.2%

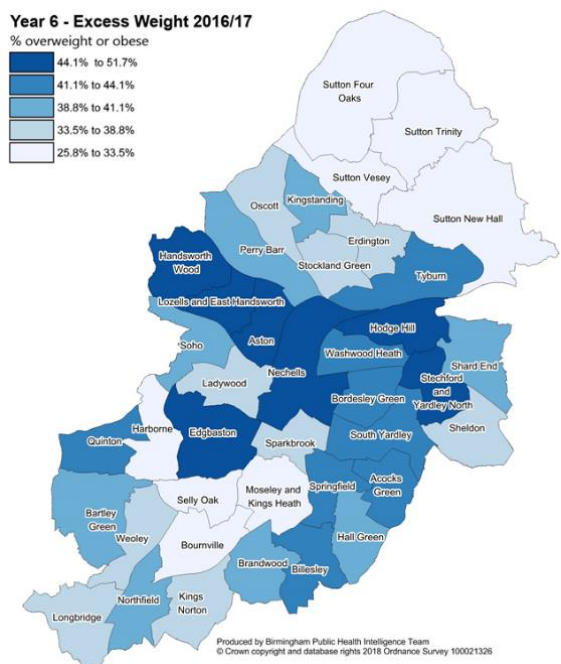
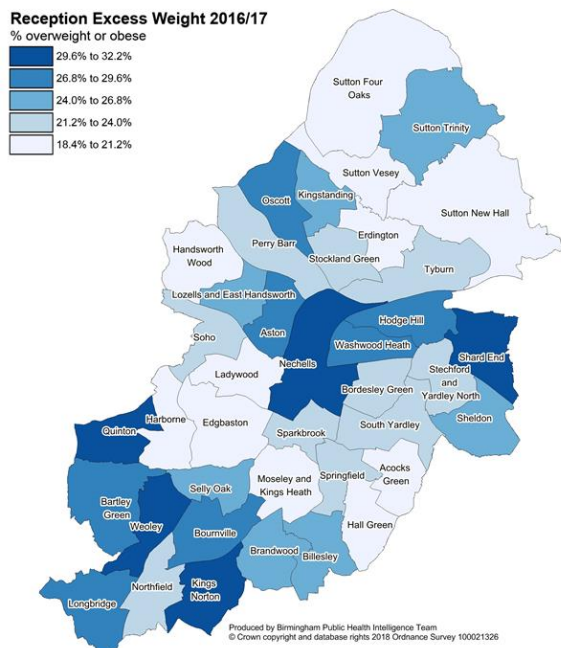
Source: Public Health England NCMP and Child Obesity Profile (6)

Table 2. Adult excess weight (overweight or obese), 2017/18

	Birmingham	England
Adult aged 18+	65.1%	62.0%

Source: PHE Fingertips Local Authority Health Profiles (7)

Figure 1: Childhood obesity at ward level, 2016-17



Approximately 17,000 people in Birmingham are entitled to Healthy Start – a national programme that provides vouchers for milk, fruit and vegetables to pregnant women and mothers of children under the age of four years on a very low income. Between 1st April 2017 and 31st March 2018, the Trussell Trust distributed 111,386 3-day emergency meals in the West Midlands. There are other organisations in the region offering this service including markets, food banks and charities. 50,000 (27%) pupils (from reception to year 11) were known to be eligible for Free School Meals across Birmingham at the last School Census data collected January 2017 – this compares to about 15% of children in England. To be entitled to free school meals children must be living in families earning less than £7,400 per year (net income and before benefits are considered).

Like all cities in the UK, there have been huge and continuing reductions in local government funding for social services, infrastructure and leisure services. Public health and prevention services including nutrition/health education have been drastically cut.

The city faces many challenges related to poor quality diets. Improving the food environment and reducing risk of diet related ill-health will help councils to fulfil their statutory duties as laid out in the *Health and Social Care Act 2012*. All local authorities in England have a duty to “take appropriate steps to improve the health of people who live in their areas,” which can include “providing assistance to help individuals minimise risks to health arising from their accommodation or environment.”(1) The food environment is a driving factor in poor diets, obesity and diet-related diseases (2,3), and taking steps to create a healthy food economy will help minimise the risk for citizens.

This audit will demonstrate that nutrition, food and health is not yet an overarching priority for Birmingham City Council, but making this a focus could help promote community cohesion, tackle racism, create employment opportunities, attracting tourists and reducing diet related-ill health (which would in turn strengthen the economy and reduce dependency on services).

Birmingham Foodscape

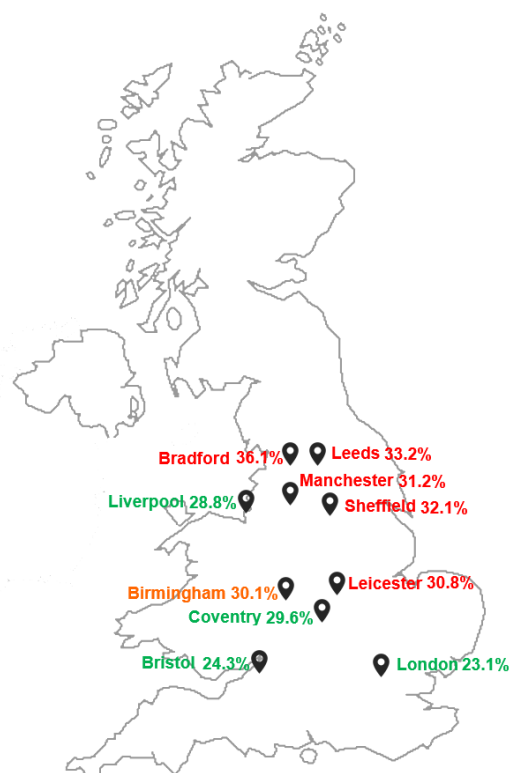
Birmingham has a thriving and exciting ‘food scene’ in parts. The City Centre hosts the UK’s favourite food chains, smaller independents, a developing Street Food scene, a wholesale market (which is due to move to Witton) and an Indoor market which is used by diverse communities and businesses for e.g. fish, halal meat, Asian fresh produce. However, the city also has a higher concentration of takeaway restaurants compared to England (30% of all food outlets versus 26% in England).(8)

Creating employment opportunities through food is important. The City Centre is adjacent to the ‘[poorest place in the UK](#)’. Although housing developments aim to move more affluent communities into poorer areas, there is the problem of ‘ghettoization’ which is inevitable unless efforts are made to support existing communities.

There are three large food related businesses present in the region: Mondalez (formerly Cadbury in Bournville), [Mitchells and Butlers](#) (M&B) and [East End Foods](#). Mondalez supports ‘Health for Life’ – a healthy schools programme. M&B trains apprentices in culinary education and training includes a focus on nutrition and sustainability. East End Foods has previously been involved in prevention work (providing free health screening for communities in hard to reach areas) and is currently involved in exploring new technologies to support [urban growing](#).

The South Asian and African Caribbean communities have established active high streets in areas like Handsworth and Sparkbrook. These areas also have developed ‘restaurant scenes’ like the [‘Balti](#)

Figure 2: Percent of food outlets that are takeaways in the 10 largest cities in England



[Triangle](#)’ which receive national publicity. Fast food restaurants, hot food takeaways and ‘dessert shops’ are also prevalent.

Methods

We’ve defined a healthy food economy as one in which healthy diets are being delivered by thriving businesses offering good jobs. In practice, this means an economic environment where healthy food is in greater supply and demand, and unhealthy food is in decline.

Literature Review and Conceptual Framework

We conducted a literature review in May 2019 to identify the latest guidance material on local food policy actions; physical activity was not within the scope of this audit. To develop the conceptual framework, we drew on guidance from Public Health England, Sustainable Food Cities, Town and Country Planning Association, the Greater London Authority, and The Kings Fund.(9–14) From this review, we identified policies and policy levers that would be available to Birmingham in their endeavours to create a healthy food economy and considered the outcomes which needed to change to indicate progress towards this goal

The literature review also identified a framework from The King’s Fund on the role of city governments in population health, which we used as the basis for the conceptual framework for this audit. The King’s Fund framework identifies five roles that city governments are “well placed to play...in relation to population health.”(13) These are: coordinating system wide action, promoting innovation, using regulatory and legislative levers, mobilising the population and using planning powers to create healthy places. (15)

To adapt the King’s Fund framework to focus specifically on food policy, we mapped the policies and policy levers identified in the literature review against the categories in the King’s Fund framework. We also considered the working relationship that Birmingham has with the West Midlands Combined Authority (WMCA). The WMCA has devolved powers to work regionally on supporting economic growth, jobs, skills development, transport, housing, and air quality, and works together with Birmingham City Council on these issues in accordance to the WMCA devolution agreements. This is important as certain policies and policy areas may have a joint remit or fall within the Combined Authority’s remit but have an impact on the food environment and economy in Birmingham.

We centred the framework around the conditions (outcomes) that a healthy food economy would hope to deliver, namely that healthy food is available, affordable and desirable, while supporting businesses in the city. To compliment the conceptual framework, we refer local authorities and cities to existing policy documents and pacts, notably the Sustainable Food Cities’ *Good Policy for Good Food* toolkit and the Milan Urban Food Policy Pact(10,16). The Milan Pact focuses on six categories – governance, sustainable diets and nutrition, social and economic equity, food production, food supply and distribution and food waste – and the signatories to the Pact provide useful examples of how to implement food policy from cities around the world.

Audit Tool

We used the conceptual framework to develop a simple audit tool to guide an investigation into which policies are in place and which could be developed. This audit tool is directly derived from the conceptual framework and the policy levers that would be available to Birmingham, as identified in the literature review (described above). We grouped the identified policy levers into the categories of actions laid out in the Kings Fund model and into sub-categories or topics that emerged from the literature review.

Healthy Food Economy: Healthy diets delivered by thriving businesses offering good jobs			
	Heading	Sub-Headings	Example Policy Actions
BCC Leadership and Coordination	Strategies and Plans	Establish a local food council/commission/coordinating group/task force	<ul style="list-style-type: none"> - Adopt a city-wide food plan - Adopt Local Authority Declaration on Healthy Weight or Local Government Declaration on Sugar Reduction and Healthier Food - Sign up to relevant international and national campaigns and pacts (e.g. Milan Urban Food Policy Pact, Sustainable Food Cities, Peas Please, etc) - Sign up to UNICEF UK Baby Friendly Initiative - Adopt a city-wide environmental sustainability action plan that includes food
		Develop a food plan/food poverty action plan	
	Include healthy food access and food poverty in other strategies/ plans		
	Leading by Example	Adopt policies and procedures in city council owned and operated settings to lead by example	<ul style="list-style-type: none"> - Visible political leadership on food policy from elected officials - Advertising restrictions on City Council estates/locations with Council authority - Support women returning to work at the City Council to breastfeed, express and store breastmilk - Implement the (real) living wage for all staff/contractors - Healthy food in their canteens
	Working with WMCA	Work in partnership with WMCA in areas that they have authority	<ul style="list-style-type: none"> - Advertising restrictions on the transport network
Levers for Change	Planning	<p>Planning restrictions on unhealthy food takeaways</p> <p>Local food production</p> <p>Planning protects healthy food shops and markets</p> <p>Establish a network of water fountains/fill points</p>	<ul style="list-style-type: none"> - Create a health/sustainability checklist for planning applications - Supplementary Planning Documents restrict development of hot food takeaways - Section 106 agreements to require financial contribution from hot food takeaways to support obesity programmes - Specify food shops as 'essential retail' in the Local Plan to restrict change of use applications - License/control street trading of unhealthy food - Community infrastructure levies can be used to contribute toward infrastructure change needed

		<ul style="list-style-type: none"> - Making community assets available to support food production – allotments, edible landscapes, repurposing green/brownfield sites, promoting food growing in new housing developments
Procurement	Public procurement and catering in early years settings, schools, hospitals and catering in public places	<ul style="list-style-type: none"> - Adopt healthy/sustainable food procurement policy, covering school meals, community meals, food for leisure centres, local authority owned care homes and local authority staff canteens/events - Work with Health and Wellbeing board(s) to encourage CCGs and NHS Trusts to take up the hospital food commissioning for quality and innovation framework (CQUIN)
Use regulatory and legislative levers	<p>Advertising</p> <p>Food safety</p> <p>Breastfeeding</p> <p>Healthy start</p> <p>School meals</p> <p>Children’s centres</p> <p>Environmental health</p>	<ul style="list-style-type: none"> - Put in place whole-school food policies - Increase uptake of free school meals - Scope a mechanism for ensuring adherence to school meal standards - Protect and promote children’s centres - Work with NHS Trusts to develop and maintain a healthy food strategy - Increase the uptake of healthy start and encourage more retailers to accept the vouchers - Create welcoming environment for breastfeeding in public places - Support breastfeeding women across the city returning to work to breastfeed, express and store breastmilk - Restrict advertising of unhealthy food - Connect work on healthy food with environmental health regulations
Promoting Innovation	<p>Business promotion</p> <p>Waste reduction and circular economy</p> <p>Local food production and thriving local food economy</p>	<ul style="list-style-type: none"> - Facilitate the use of derelict land or buildings for growing spaces/healthy food businesses (also links with planning actions below) - Use economic/tourism policies to support a healthy food economy - Business rate relief for healthy/sustainable food start-up businesses - Set a target for reducing food waste across the city - Incorporate food waste reduction into all relevant policies (eg. Procurement policies described above) - Support businesses through urban food awards - Explore establishing a local food innovation hub to support new healthy food businesses

	Mobilising the Population	Public communication Citizen Engagement Living wage	<ul style="list-style-type: none"> - Establish on-going citizen engagement mechanisms on healthy food policy - Promote the (real) living wage to local employers and suppliers - Business rate reductions to businesses signing up to the living wage - Work with partners to implement a social prescribing schemes for fruit and veg, referrals to growing schemes, etc.
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Interviews and Desk Research

To conduct the audit of policies, we spoke to 18 officials in Birmingham – both within and external to the city council. As a complement to the interviews, we also conducted internet-based desk research to identify written policies and materials.

The interviews covered a range of topics aligned with the conceptual framework and audit tool. We spoke to individuals with authority over or in-depth knowledge on:

- Public health policy
- Early years provisions in the city
- Hospital food and clinical commissioning
- Civic catering and procurement
- Employee health
- Food safety and environmental health
- School food
- Advertising
- Planning
- Training and skills
- Business development and support
- City strategic development

The interviews were semi-structured and designed to illicit a wide range of information from each participant. The questions focused on:

- Policy levers available within the city to create a healthy food economy
- Suitability of existing policies to deliver a healthy food economy
- Changes needed to existing policies to deliver a healthy food economy
- Gaps and additional policies needed to deliver a healthy food economy
- Coordination with the West Midlands Combined Authority

Each interview lasted between 30 and 60 minutes and were conducted through a combination of in-person and phone interviews. The interviews were recorded and qualitatively analysed using the audit tool to identify key themes within each subject or topic area as well as across topics.

To support the interviews, we conducted targeted internet research. This included reading written documents that corresponded with policies or programmes that were identified in the interviews, and to investigate the emerging policy gaps to see if policies were documented but hadn't been discussed in the interviews(15,17–27).

The interviews were also used to validate and supplement the audit tool – whereby policies and policy levers not previously identified were added to the audit tool.

Detailed Findings by Policy Topic

Strategies and Plans

Policy Action	Enacted in Birmingham	Identified by Interview	Identified by desk research
Establish a local food council/commission/coordinating group/task force	Emerging	x	
Adopt a city-wide food plan	No		x
Adopt local authority Declaration on Healthy Weight or Local Government Declaration on Sugar Reduction and Healthier Food	Yes - sugar	x	
Sign up to relevant international and national campaigns and pacts (e.g. Milan Urban Food Policy Pact, Sustainable Food Cities, Peas Please, etc)	Yes	x	x
Sign up to UNICEF UK Baby Friendly Initiative	Yes		x
Adopt a city-wide environmental sustainability action plan that includes food	No	x	x
Include healthy food access and food poverty in other strategies/plans	No		x

Birmingham is taking some positive steps towards establishing a city-level programme of work which would support a healthy food economy, including publishing a Birmingham Public Health Green Paper, signing the Local Government Declaration on Sugar Reduction and Healthier Food, establishing a Healthy Food City Forum that reports into the Health and Wellbeing Board, and including a restriction on hot food takeaways in the Birmingham Development Plan. The city has also been selected as one of the Childhood Obesity Trailblazer cities as part of the government's Childhood Obesity Plan. Birmingham was an initial pledger to the Peas Please initiative, signatory to the Milan Urban Food Policy Pact, and has established a learning partnership on food policy with Pune, India. The city has also recently established the Creating a Healthy Food City Forum and launched a programme of citizen engagement on food, both of which are important steps towards delivering a Healthy Food Economy.

However, there is no overarching strategy or plan to drive work on healthy food in the city, which participants felt was needed to galvanise action, in much the same way that the Clean Air Act has driven action on air pollution in the city. Such a plan would help to connect the various strands of work happening on food in the city, and to strategically align priorities across city departments.

'It [the Clean Air Act] was obviously an aspiration to start off with. A lot of people didn't want it and a lot of people still don't want it. But it has been pushed, it has been pushed a lot, push by a lot of people and the positive messages. It all that kind of stuff that needs to go around it for something to happen.'

'The system isn't really working, there is no connection between the systems

'So, if we are thinking about healthy food or the healthy food economy or a vibrant food economy – actually what does that mean in Birmingham?'

Two compelling examples emerged from the audit to demonstrate why an overarching food strategy is needed. Firstly, to make the most of the Childhood Obesity Trailblazer opportunity, it will be important to ensure this work feeds into a clear strategy and direction of travel for food in the city more broadly. And secondly, participants from the environmental health team felt they were not being employed as strategically as they could. They hold a database of all food businesses in the city, and have existing contact points with businesses, but felt that these opportunities and their expertise weren't fully utilised for public health benefits, in part due to restricted resources to complete this work.

'We have a lot of opportunities with this database that we have and also the experience that we have as officers, but it's not utilised apart from inspecting premises.'

With a strategic vision and plan for healthy food in the city, the council can then examine existing plans to better incorporate healthy food within them, such as the Birmingham Development Plan, as will be discussed later in this report, and to strengthen the linkages to food when the city is taking forward work on sustainability or economic and business growth, such as through the work of the Sustainability and Transport Scrutiny Committee.

Leading by Example

Policy Action	Enacted in Birmingham	Identified by Interview	Identified by desk research
Adopt policies and procedures in city council owned and operated settings to lead by example	Emerging	x	
Visible political leadership on food policy from elected officials	Yes	x	
Advertising restrictions on City Council estates/locations with Council authority	Partial	x	
Support women returning to work at the City Council to breastfeed, express and store breastmilk	No		x
Implement the (real) living wage for all staff/contractors	Yes		x
Healthy food in BCC canteens	Partial	x	

'Look if BCC can do it, then we can do it.'

Birmingham City Council is in a position to influence businesses and other organisations within the city, and one of the strongest influencing mechanisms at their disposal is leading by example within their own buildings, on their estates and sites, and with their employees. The Council is leading by example way on several important topics, including by having a written living wage policy for all council employees and contractors as well as a 'Making Birmingham a Living Wage City' Action Group. The council is also undertaking a culture change programme for its employees, which provides important opportunities for Birmingham to lead by example. The city has also tried and

faced some challenges with restrictions on unhealthy food advertising, as will be discussed later in this report.

However, participants felt the council could go much further in these efforts, particularly in creating a healthier food environment within their own buildings and estates. Public procurement was discussed as a key lever at the city's disposal, and that in order to improve procurement across the city the council should look to create the strategy and vision for healthier food procurement in their own canteens and buildings. This will be discussed later in the report but is especially important as businesses may look to Birmingham City Council for guidance and advice on what nutritional or health schemes they should follow.

'[Businesses say to us] we want to follow a nutritional value scheme, there are so many schemes out there, which one do we choose, which one do we go for, because none of them, for them, fitted their criteria, specifically. They said, we want something Birmingham have, do Birmingham have one?'

Working with West Midlands Combined Authority

Policy Action	Enacted in Birmingham	Identified by Interview	Identified by desk research
Work in partnership with WMCA in areas they have authority	Partial	x	
Advertising restrictions on the transport network	Partial	x	

Regional collaboration is especially important for creating a healthy food economy, as food businesses in the City may operate in the region more widely and improving access to healthy and local food in the City will be dependent on the strength of the regional food system. The audit found that Birmingham City Council is working in collaboration with the West Midlands Combined Authority on business engagement in general, but not explicitly for the purposes of creating a healthy food economy, and they are working together on employee wellbeing, which could include a much greater focus on healthier food.

'It is very much about collaboration, rather than competing with one another, it is all about collaboration in terms ensuring that businesses in the area get access to all the range of programmes we have got, so that the combined authority doesn't have duplicate programmes. We have programmes that are available to businesses across the combined areas.'

The Thrive at Work is an example of collaboration between WMCA and Birmingham City Council. The Thrive at Work tool kit provides guidelines and criteria for the health and well-being of employees, and is coordinated by WMCA, with Birmingham City Council implementing it with their employees. Healthy food is not a high-level focus of this programme, but there are multiple links with employee wellbeing and the food environment in workplaces, and we will discuss this further below in relation to public procurement. As part of this programme, Birmingham City Council has put in place a Culture Change programme which hopes to work together with city procurement to improve the health of the food offer for employees. The WMCA is also currently developing a Healthy Weight Region programme which will focus on *'how to create an environment for the region which is developing healthy weight and using good mental health, good physical activity...and linking that into retailers and inclusive growth and the development of a structured systemic approach for health weight and health people.'*

Planning

Policy Action	Enacted in Birmingham	Identified by Interview	Identified by desk research
Create a health/sustainability checklist for planning applications	Partial		x
Supplementary planning documents restrict development of hot food takeaways	Yes	X	x
Section 106 agreements to require financial agreements from hot food takeaways to support obesity/healthy food programmes	No		
Specify food shops as essential retail in the Local Plan to restrict change of use applications	No		
License/control street trading of unhealthy food	No		x
Community infrastructure levies are used to contribute toward infrastructure needed to create a healthy food economy	No	x	x
Making community assets available to support food production – allotments, edible landscapes, repurposing green/brownfield sites, promoting food growing in new housing developments	Partial		x

Birmingham has taken strides to incorporating the healthfulness of food into the city's development plan. There currently exists a 10% restriction on hot food takeaways. This was adopted in 2012 as part of the Shopping & Local Centres Supplementary Planning Document (SPD), and then modified in the 2017 Birmingham Development Plan.

"In order to avoid an over concentration of hot food takeaways (A5), within the Centre Boundary of Town, District and Neighbourhood Centres, no more than 10% of units within the centre or frontage shall consist of hot food takeaways. Applications for a change of use to A5 within the centre will normally be refused where this figure has been or will be, exceeded. In considering applications for A5 uses account will also be taken of other factors including the type and characteristics of other uses in proximity to the application site, the size and type of unit, and the proximity of the site to dwelling houses."(28)

The 2019 monitoring report shows a significant reduction in planning permissions for hot food takeaways since the policy has been in place. This suggests that planning policy is an effective way to influence the local food environment, however beyond the hot food takeaway restriction food could be much stronger in the Birmingham Development Plan.

‘...we have a very clear policy that we have been applying since 2012 and it’s helped to reduce or manage concentration of hot food takeaways....The inspector has accepted that 10% is a reasonable amount we can’t put further restrictions on that’.

Part of the reason for this is the restricted scope of planning policy, including needing to follow the National Planning and Policy Framework (NPPF).

‘Planning is very limited to... land use change, we can only manage the growth and distribution of various uses...Every policy has to be justified by evidence, has to meet the three tests of being effective, deliverable and positively prepared’.

However, the NPPF sets out that planning policy can include access to healthier food, but this hasn’t yet incorporated this to the full extent possible in Birmingham’s planning policy.

“Planning policies and decisions should aim to achieve healthy, inclusive and safe places which...enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.” – NPPF (29)

‘On the ‘Birmingham Development Plan 2031’, there is nothing [more broadly] on food in the report, except a section on allotments. It states that when there is a shortage of allotments, they will consider using surplus open space. In terms of the planning checklists, there isn’t anything in relation to food/health but there are some efforts to improve sustainability, within the ‘sustainable construction and energy statements’.

In November 2018, Birmingham Public Health released a Planning Toolkit for Developers, to guide them through a health impact assessment, which includes ‘Access to Healthy Food’ as a core indicator. This asks developers to consider if their proposals allow for growing of local food, a range of retail shops including food stores, and if they will contribute towards an over-concentration of hot food takeaways.

As the quote above highlights, the city’s Development Plan does include a section on allotments, outlining that land for allotments is allocated or reassigned based on demand for those allotments – and this is also included in the Planning Toolkit for Developers; however, this needs to be supported by broader efforts to encourage food production on allotments and in other sites, particularly within new housing developments.

On other topics within this area of the audit, street traders in Birmingham are required to register with the city and with Environmental Health. While there are no formal restrictions on unhealthy street food vendors, applications are sent to the Director of Public Health, who can object to an application – though it is unknown how many applications have been reviewed and denied on this basis. The city hasn’t yet used Section 106 agreements, which participants reported as ‘worth exploring’ but ‘not a straightforward policy to implement.’ Section 106 agreements, also known as planning obligations, are legal agreements between the local authority and developers to mitigate the impact of the development on the local area and can include cash or in-kind contributions.

Procurement

Policy Action	Enacted in Birmingham	Identified by Interview	Identified by desk research
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Adopt healthy and sustainable food procurement policies, covering:	Partial	x	
- School meals	Yes	x	x
- Community meals	None identified		
- Food at leisure centres	None identified		
- Local authority owned care homes	No	x	
- Local authority staff canteens	Partial	x	
- Local authority events	Partial	x	
Work with Health and Wellbeing board(s) to encourage CCGs and NHS Trusts to take up the hospital food commissioning for quality and innovation framework (CQUIN)	None identified		

We conducted interviews across procurement services in Birmingham, including schools, an NHS hospital and catering for the council. Participants reported some positive procurement changes which have reduced sugary drinks across settings, and catering for the council has reduced the amount of full fat crisps, snacks and full fat milk being sold. All of the relevant participants reported following their applicable government standards, whether the Government Buying Standards' (GBS) or school food standards. The use of GBS was seen as positive, but that they don't go far enough in ensuring that healthy options are available.

'The Gov buying standards...which are in place but not necessarily enforced and implemented- I don't know if they are enforced. But also if you went to a café and you look, there is no healthy option, but everything is meeting the government buying standard.'

The NHS hospital we interviewed recently overhauled their procurement contracts, shifting to a '95% fresh food prep onsite model'. They completed a prioritization survey and found that 'people really wanted to re-connect around the story of food, and that it was around the experience and social aspects around dining that mattered... and that it should be enjoyable and fun'. Their focus is on social value, 'particularly around regional sourcing... there is a commitment to developing a supply chain with a certain percentage of regional growing'. The hospital has improved their retail proposal, introducing the healthcare franchise 'Crush', a brand which includes juices and salads.

School caterers reported that they have a similar commitment to 'serve fresh food, make sure that it's sourced in an environmentally sustainable way and that it's ethical, and to make healthy choices a lot easier, while supporting local suppliers'. They have worked with the Soil Association and Food for Life, within the City Serve school portfolio one site has achieved the 'Bronze Food for Life' award. They are careful about the food that they give the students and 'work very closely with students across the city with students to understand what they want to eat.' They then 'take it back to our development kitchen and make it school food compliant, so we are mindful of reduced fat and reduced salt'. There are also healthy food assemblies where children come to at the development kitchen to learn about nutrition and participate in school cooking demos.

Within catering for the council there is a new healthy eating platform in development, called 'Whisk'. The new procurement system will include calorie counts and health scores so businesses

can reformulate recipes and customers can track their eating habits and gather nutritional information. However, participants felt that council procurement and catering needed to go further in ensuring a healthier food environment.

'Someone within procurement needs to have a really good understanding about nutrition, food and health- but they have to rely on a framework- something is just not happening. We have had GBSF for a while, we have had a focus on quality of food for a while, but it is not translating. Not sure if its policy or trade to implement. That does require funds.'

The CCG is on the health and wellbeing board in Birmingham, but interview participants did not speak to the extent to which NHS procurement is connected to the health and wellbeing board to encourage CCGs and NHS trusts and to take up CQUIN.

Use Regulatory and Legislative Levers

Policy Action	Enacted in Birmingham	Identified by Interview	Identified by desk research
Put in place whole-school food policies	None identified		
Increase uptake of free school meals	None identified		
Scope a mechanism for ensuring adherence to school meal standards	No	x	
Protect and promote children's centres	No		x
Work with NHS trusts to develop and maintain a healthy food strategy	Partial	x	
Increase the uptake of healthy start and encourage more retailers to accept the vouchers	In progress	x	x
Create welcoming environments for breastfeeding in public places	None identified		
Support breastfeeding women across the city returning to work to breastfeed, express and store breastmilk	None identified		
Restrict advertising of unhealthy food	Emerging	x	
Connect work on healthy food with environmental health regulations	No		

The Audit covered a number of regulatory and legislative levers that the city could potentially use to create a healthy food economy in the city. This includes making the best use of national nutrition programmes, such as the free school meals programme and the Healthy Start scheme, ensuring that the city's settings for children promote a healthy food environment and support breastfeeding, and that advertising for unhealthy food is restricted in the city. We will address each of these in turn. As a result of the interviews, we also added environmental health regulations to the audit tool, as it emerged as a key lever that is not yet being fully utilised in the city.

School Meals

As discussed above, the school food programme in Birmingham follows the school food standards and aims to promote healthy food to pupils. However, participants reported that the school meal system is facing financial pressure, as in many settings across England. The effects of this are seen in a number of ways, including the scaling back of the Health for Life programme to just nursery and primary schools (when it used to also be in secondary schools). Annually they recruit 20 schools and work with them for 18 months to try and make sustainable change within their curriculum and provisions around healthy eating, practical food cooking, gardening, physical activity and working with parents. The Be Healthy Schools programme is also now not funded centrally and is being used only in schools that are buying in the service.

The Council has also linked with Birmingham University and conducted a cluster randomised controlled trial on WAVES (West Midlands Active lifestyle and healthy Eating in School children)(30). The programme looked at food and physical activity in Year 1 school children in 50 schools based in the West Midlands, to prevent overweight and obesity. The analysis of WAVES found no significant difference in the children's body mass index and also found no evidence on the cost-effectiveness of the intervention, suggesting that schools must be supported by interventions in other areas of the city.

The city also has a Happy Healthy Holidays programme, which targets 18,000 children who are on free school meals.

'Holiday kitchen is a great initiative but how do we take it from an initiative to a system impact?'

Early Years, Children's Centres and Healthy Start

There are a number of excellent healthy food initiatives in Birmingham that are supporting early years. We spoke to people involved in 'Forward Steps,' an integrated early years and health and wellbeing service. Since January 2018, it has brought together health visitors and children centres into one integrated service. 'Spurgeons', a national children charity, leads on ten children centres which fall within four districts. Within each of these districts, they work together with health visitors to deliver an integrated service to *'raise and promote health and activities within the area.'*

These activities included 'Start Well,' an award system open to all early years settings in Birmingham except for childminders, HENRY (healthy eating and nutrition for the young), 'Kids on Track' and oral health promotion. Importantly for the food environment in early years' settings, 'Start Well' has been involved with improving children's menu's across catering services within the UK, however though it is free for the centres, it has not been without its challenges, and this is underscored by the significant drop in children's centres, which have fallen in number from 75 to 22.

'Some caterers are more willing than others, but we have quite a few on board that we work with. We see their menu's we compare them against our guidelines, and Public Health England's early years guidelines, and then we give them recommendations, of what changes they would need to make to make it meet them so that has been good.'

'The best way is to go and observe what they are doing and actually it, see meal times, see the environment - have they got unhealthy food in the play area? Have they got posters that are promoting unhealthy products?'

Birmingham has also recently undertaken a concerted programme of work to increase the uptake rate for the Healthy Start programme. This has been successful; from April to December 2018 Birmingham saw a 5% rise in uptake, from 70% to 75%.

Breastfeeding

Existing programmes on breastfeeding include Birmingham's maternity service (BUMP) which provides infant feeding training as part of their antenatal classes, and Birmingham Forward Steps which works with mothers to initiate and continue breastfeeding. However, the city could do more work to create a favourable environment for breastfeeding, including the promotion of breastfeeding friendly spaces and exploring ways that the city can support women to breastfeed or express milk upon returning to work. In the absence of national legislation on breastfeeding rights upon returning to work, the city's leadership in this area would be a nationally relevant case study.

Advertising restrictions for unhealthy food

The city has incorporated healthy food criteria into their advertising policy, which includes meeting national Advertising Standards Agency restrictions on advertising food for children the distance from schools and colleges. In 2015/2016, the city wanted to add additional criteria to their advertising terms and conditions, to strengthen the ASA requirements, especially for advertising around schools. However, with these strengthened criteria included they were unable to secure a bid for their tender.

'We also put in that, no advertising could be within 100 metres of school. That got difficult when you started saying bus stops and things like that, it's pretty much the whole of the city, and we were unable to procure.'

Connecting work on healthy food with environmental health regulations.

When we spoke to participants from the Environmental Health department, it became apparent that the city can do more to connect different departments to work on healthy food. The participants stated they were involved too late in the process as they are seen as just regulators. Other departments seem to be unaware of their database of all food businesses in Birmingham and the levers available to connect with the food businesses. There are opportunities to work in partnership to support food business to provide healthier options and to target certain premises to the benefit of the business and local community.

'What we found in our job- you can give everybody as much information as you want but if you don't give them levers to use the information, it gives them the option to take it or not.'

'It is quite hard for us to work with other people, because people don't know what we do as they see us as more of a regulator and not necessarily somebody who can actually help. People don't see regulation can actually help people be more sustainable and produce a better product at the end. We get to hear about things when other things have gone wrong or at the last minute.'

'We know every food business. We have the contacts with food businesses. So, if we did want to influence them, we are in there and we are seeing business. It's just at the moment, we are entirely limited to the actions we have to do by law. We have statutory legislations we have to ensure compliance with.'

Promoting Innovation

Policy Action	Enacted in Birmingham	Identified by Interview	Identified by desk research
Facilitate the use of derelict land or buildings for growing spaces/healthy food businesses	Emerging	x	

(also links with planning actions above)			
Use economic/tourism policies to support a healthy food economy	No	x	
Business rate relief for healthy/sustainable start up food businesses	No	x	
Set a target for reducing food waste across the city	Yes		x
Incorporate food waste reduction into all relevant policies (e.g. procurement policies described above)	Partial		x
Support businesses through urban food awards	No	x	
Explore establishing a local food innovation hub to support new healthy food businesses	Yes	x	

Birmingham has a large business community and the city has a desire to promote business and innovation in the region. Food businesses in Birmingham are numerous, and change regularly, presenting a key opportunity to shift the business landscape towards those that support a healthier food environment, and participants felt that there is appetite among food businesses in the city to become healthier.

'Huge turnover of food businesses in Birmingham, we have 1000 to 1500 new registration a year. Which is a ridiculous amount of new food businesses each year.'

'What surprised us was how many businesses want to change but they don't have either the information or knowledge to do this...particularly the manufacturers. In changing a product you have to change their HACCP plan and have the product tested for composition, calorific value etc and they didn't have the knowledge of how to do that, nor the funds to cover the expense of that change, especially if they had to bring in new equipment. In some cases, they didn't...But many were willing to try it if they had the right information and the right support.'

In the past, the city had a Healthy Choice Award for businesses, with the criteria set by nutritionists. The scheme only ran for a few years, and during that time they had 200-300 applications. This type of model could be explored again, however participants cautioned that the scheme would need to make sure it was not only reaching businesses that were healthier to begin with, and that it would come at a cost to the city.

'If you are giving out healthy choice awards to health food shops- you are not achieving anything. Our idea was [to reach] those places that were more unhealthy that we are encouraging them to become healthier, which will have a bigger impact. We wanted an award that was available to everybody including takeaways so that there were small steps they could take to achieve a bronze award.'

'The awards can be set up, but it's the cost, the resources.'

There are many programmes to support business innovation and development in the City, including how the city's businesses support tourism, however none are specifically targeted at improving the healthfulness of food businesses. The Business Enterprise and Innovation department offer a range of programmes to both new and existing businesses, to meet their individual needs. The Property Investment programme helps existing businesses to upgrade their property, build extension and increase productive space and offers funding up to £200,000. For start-up or SME's there is the Innovation Birmingham programme which offers incubator spaces at subsidised rates as well as business support and mentoring. The Skills Development programme is currently waiting on a £12 million approval which will help increase skills in small and medium enterprises. Collectively, there is a huge opportunity to engage food businesses through these programmes.

'We do what we do in terms of business agenda. Colleagues in the Public Sector (as in Public Health) do what they do. It is important to bring the two things together. Healthy living, healthy products, healthy foods is important. How can you bring that into the businesses agenda?'

The former Custard Factory building is now being used as an incubator space for 400 small businesses, which is an emerging example of the city using derelict buildings for healthy food businesses. However, we didn't find evidence of there being a strategic plan or process for using derelict spaces for food purposes.

In 2017, Birmingham adopted their Waste Strategy 2017-2040, and aims to decrease the amount of waste, including food waste by 10% by 2025. Food waste currently makes up 48% of a typical rubbish bin in Birmingham. The council will use an education and engagement strategy to help reduce food waste rather than separate food waste collection, for the time being, due to a cost/benefit analysis.

There are opportunities to link food more into The Birmingham Business Charter for Social Responsibility. It includes measures on 'Buy Local' which would be applicable to food procurement, and the Birmingham City Council's supply portal is a place for local suppliers to advertise their products for procurement. It also includes measures on 'Green and Sustainable,' including reducing waste, which could include food waste. We were also unable to identify evidence of the council using Business Rate reduction to encourage healthy or sustainable food start-up businesses.

Participants stressed that the *'key lever [for engaging businesses] is money.'* Start-up and existing businesses approach the Department due to the funding available *'as part of their development and growth'*. This type of lever creates an opportunity for the department to set a standard and a programme which encourages food businesses to develop and prioritise healthy food. Making this shift toward healthy food would require a collaborative effort across the city council, including the Public Health and Environmental Health teams.

'We certainly can put links- I don't think we have actually pushed the healthy food agenda as well as we should do. There are opportunities for us to do something like this.'

Mobilising the Population

Policy Action	Enacted in Birmingham	Identified by Interview	Identified by desk research
Establish on-going citizen engagement mechanisms on healthy food policy	Emerging	x	
Promote the (real) living wage to local employers and suppliers	Yes		x

Business rate reductions to businesses signing up to the living wage	No		
Work with partners to implement a social prescribing scheme for fruit and veg, referrals to growing schemes, etc.	No	x	

Supporting citizens to have adequate livelihoods – so they can afford the healthy food on offer in the city – is an important lever for change available to Birmingham. As described above, Birmingham has a city-wide living wage action group. As of September 2019, 60 employers in Birmingham were providing the living wage, which is a great start but to put that in context, there are 43,000 enterprises operating in Birmingham(31). We were unable to identify evidence of the Council using Business Rate reduction to incentivise businesses to sign up to the Living Wage.

The city is also funding a cluster of GPs to create a network of health and social care programmes and initiatives for social prescribing, as a quarter of people visit their GP for non-medical reasons. Social prescribing creates opportunities for people to be referred to food specific programmes, but the interview participants report that there has been a disinvestment in existing healthy lifestyle and weight management programmes which creates a challenge. There may be opportunities to do more with social prescribing and its link to food.

The City Council has recently begun a programme of work called Seldom Heard Voices to systematically hear from, and capture, citizens voices in their food-related work – this will undoubtedly identify new potential actions for the Council to pursue in this area. This is part of the much larger year of National Food Conversation which was launched in October 2019 which is creating multiple opportunities for citizens to offer their views on their food future.

Analysis and Key Themes

Birmingham is starting from a reasonably strong position in its ambition to establish a Healthy Food Economy. The city planning policy to restrict hot food takeaways demonstrates strong commitment that other cities have been learning from. There are also some advertising restrictions on council owned or managed estates (though attempts to apply stricter standards have faced difficulty), a number of settings use the Government Buying Standards for food procurement, and the city is working to increase the uptake of the Healthy Start scheme. The coordinated approach taken with early years services has demonstrated an efficient way to make use of limited resources. Birmingham was an initial pledger to the Peas Please initiative, and a signatory to the Milan Urban Food Policy Pact. The city has also recently established a Creating a Healthy Food City Forum and launched a programme of citizen engagement on food, both of which are important steps towards delivering a Healthy Food Economy.

The interviews conducted for this audit focused on how to build on the existing good work happening in Birmingham, and there were a few key areas for progress that came through clearly. The key findings include:

- The need to improve coordination and coherence between existing policies and programmes

- Missed opportunities in connecting the business and public health agendas
- The need to negotiate the trade-offs and tensions between policy objectives, including targeted versus universal approaches and the occasionally conflicting goals between health and business growth.

Coordination and Coherence

A number of participants felt that there was a lack of joined-up thinking across the city on food. In particular, participants highlighted the need for the health, business and environmental health sectors within the city council to work in a more coordinated way. As one person described it:

'one of the issues is that, what we do and what other people do in the council is very, very fragmented. We need to be more joined up in terms of policies and implementation and delivery.'

The environmental health department is a key link between the city council and food businesses operating in the city. Yet, speaking to individuals within the department it became clear that they felt they could be doing more to link those businesses with the healthy food agenda.

Participants also told us how there are some good existing policies and programmes in Birmingham, but that there needed to be more focus on the whole food environment across the city. The audit found good and emerging practice in some settings, including early years, schools and hospitals, but there is no overarching strategy seeking to improve the food environment across the city. This is particularly important for amplifying the impact of the initiatives currently in place. As one participant described:

'I've seen many initiatives come and go with various impacts but they do impact some people. To have that broader appeal it needs to be incentivised, in a way that we haven't either tapped into yet or have the resources to now realise'.

Inspiration can be taken from the NHS hospital we interviewed, who said: *'we have shifted away from personal choice intervention we do a lot less now about telling people directly that they should just eat more healthily and that will solve their problems'.* The whole environment was something that was important to them because, *'essentially, obesity is a normal response to an abnormal environment'.*

Public procurement was mentioned by multiple participants as a key mechanism for delivering a healthier food environment across the city, and illustrates why a city-wide strategy is needed. Many settings in the city are applying the Government Buying Standards or the School Food Standards, which is positive. However there are many different schemes that businesses within the city could follow, resulting in confusion and disjointed approaches, and the city could lead the way by creating a broader set of standards that bring together health/nutrition, quality, food safety and hygiene, and applying these standards whenever business is procured, at any level, by the Birmingham City Council.

'There are so many different schemes. And then it might only last for a year because you can get a licence for one. Should we just make our own up? Would the food industry want it?'

Across the research there was some discussion of working with the West Midlands Combined Authority. Working in coordinated and coherent approach would also open additional opportunities for collaborating with the West Midlands Combined Authority. This is particularly important when

seeking to healthy food business innovation in the city, as businesses may come from or draw on supply chains and partners across the region.

Missed Opportunities to Connect Business and Public Health Agendas

There is a good programme of work happening in Birmingham to promote business in the city, and strong environmental health regulations to ensure that food businesses are serving safe food. However, there is no dedicated approach to encouraging food businesses to serve healthy food, and as discussed above, participants felt there needed to be more connection and coherence between these agendas. This is particularly important in the rapidly changing environment that food businesses are operating, which a number of participants referenced in relation to online takeaway delivery aggregators such as Just Eat.

'Just-Eat has massively changed the environment in Birmingham, if they could come on board saying they could only have business that provide food that is low in sugar, salt etc. if they had a standard- so many businesses want to be part of Just-Eat, they will do anything.'

The environmental health team maintains a database of all food businesses in the city, which public health could tap into more, and colleagues from the business innovation department report being open to developing a joint programme of work to encourage healthy food businesses. Bringing these agendas together could mean that Birmingham becomes a thought-leader in promoting business and economic growth while delivering a healthy food environment. This won't be without its challenges, as participants reported a big gap between these agendas at the moment, including a lack of healthy food businesses that can be used as a model to build off from, and that the food businesses the innovation department have previously supported have been on the unhealthy end of the spectrum. However, there is appetite for cross-sector work, and the City is beginning to act upon this with the Healthy Food City Forum, which will hopefully lead to more effective coordination

Trade Offs and Tensions

Two key trade-offs and tensions emerged from the research: putting resources into targeted versus universal approaches and navigating differences between health and business goals.

Targeted versus Universal Approaches

The tension between targeted and universal approaches came up most prominently in the interviews focused on early years and children's food. In the area of the early years, initiatives such as 'Start Well' and 'Henry' are providing both universal and targeted approaches to educate children to eat more healthily. However, there is a challenge in providing a universal service across an authority as large as Birmingham with the level of resources available to these programmes, which means they feel they *"don't have the resource available to us to deliver it on the same scale everywhere across the city."* This challenge is particularly illustrated by the reduction in the number of children's centres. A similar theme emerged in relation to healthy school assemblies, where children get involved with nutrition and cooking, which has *"won [Birmingham] awards and makes us best in class, but we actually can't afford to do that anymore."*

This tension also arose when participants were discussing prevention versus treatment services. One participant mentioned needing to move *'away from prevention type stuff and toward the delivery of services.'* Another held the opposite view, that prevention services provide better value for money and should be expanded.

'As well a universal provision, is there something we can do for those children are at higher risk?'

'Maybe we don't need to do much with "worried well parents," maybe we need to do more targeted interventions.'

Within more targeted approaches, such as the Healthy Start vouchers, there is an opportunity to strengthen the existing provision even further than the steps Birmingham has already taken. As one participant described:

'The healthy start/vitamins campaigns aren't working as well as they could do in Birmingham. We are very fortunate that we have the free vitamins but people aren't necessarily aware of them, or aware of where to get them from.'

'The process of obtaining them is extremely complex. We could have a trial first, which would mean that they don't have to go through the process.'

Solutions to this are being explored at the national level, in terms of digitising the Healthy Start scheme, but Birmingham has collected a wealth of knowledge about how the scheme is operating locally, and more could be done to put those insights into place.

Health versus Business Goals

Across all policy areas, there was a tension between business and health goals, especially when falling outside the public realm. In the early year's settings, we found a clear appetite for policy change but nurseries themselves face business pressures that are occasionally counter to those policy aims.

'nurseries: sometimes you have to win them over as they are scared to challenge some of the behaviours because they don't want to lose business'

Procurement within the catering service is similarly restricted by economic concerns and business is reliant on what the public demands. However, there is an appetite for change there too. When clients book the catering service, *'they ask us lots of questions about healthy eating, what's in the food, what's on the calorie counter... there is definitely an appetite, definitely in the corporate market'*.

Changing advertising regulations has been a challenge for the city as a large proportion of the city's advertising revenue comes from food, which is often unhealthy.

Originally what public health wanted was no advertising on food at all but that's what 90% of advertising is, it's food and beverage advertising. To have no advertising, there would be no commercial value so we would be wasting our time.

When further restrictions were incorporated into a recent tender, the city was unable to secure a bid. When discussing this, interview participants said that change needs to happen at the city and national levels at the same time, and this is something the city could become a thought leader on.

'Money will go to where the assets are, and where the good assets are... you will not stop food advertising, it will just go to another portfolio... the only way you can stop it is if you stop it for everybody'.

Hosting the Commonwealth Games in 2022 is a huge opportunity for Birmingham to implement positive messages around health, however participants raised issues about how difficult it will be to implement advertising restrictions for unhealthy food during the Games.

Policy Gaps and Opportunities

The Council should set a city-wide plan or act for healthy food – similar to the Clean Air Act – to provide authority and direction for delivering a healthy food economy in the city. This plan should focus on the whole food environment and set a vision for the next 20-30 years.

'Food is seen as a fundamental thing- everyone eats. It is part of the economy, it is part of people's identity, it is a part of the retail sector, it is a part of tourism, it is a part of so many things. There needs to be a systematic overhaul of all the policies.'

Developing a plan is as much about creating a collective vision as it is about formalising processes and plans – people we interviewed didn't necessarily know what was happening with food beyond their immediate sector. This plan should take inspiration from the Clean Air Act in its ambition and city-wide approach.

'What has been interesting and maybe something we can build on to change peoples' perception is the example of the air pollution. What I find really interesting is that it is a public health issue, the air quality. If you think that is a health issue and we treat it as we would do food, then actually what you would say to Public Health is run some campaigns and tell people to stop driving their cars. That's how we tackle food. While in actual fact to order to change air pollution what you actually need is you need a lot of infrastructure, need to have walking and cycling, you need to have trams, you need to have regulation saying if you drive your polluting vehicle within these dimensions, you will get a fine.'

'We need to use that model [the Clean Air Act]...a bit of the infrastructure, the policy and the regulation. That is what we need to do around other health issues, particularly around food.'

'One of the problems is that health has been siloed into 'that's what Public Health do, that's what the NHS do, without thinking of it as a wider issue.'

Included within the city-wide healthy food plan should be a funded programme of work that draws together departments in the Council working on public health, environmental health and business innovation to build on existing initiatives and explore new routes to encourage healthy food businesses in the city.

'If we can't do it ourselves, I think working alongside other services who have potentially more knowledge about nutrition and we can link in with what is feasible, what is going to work with businesses, the manufacturing processes, linking in with business.'

'There isn't anything specifically at the moment on food, but certainly if we feel collectively as a city council there is evidence need and demand we need to do something about this, then we are happy to be involved in a discussion that helps us put together a dedicated programme to do this.'

The Council should strengthen existing programmes targeting children including through additional capacity for the food schemes delivered by the coordinated early years services, increasing uptake of the healthy start scheme, increasing uptake of free school meals, ensuring free school meals are provided to all who need them, including children with no recourse to public funds, and scoping a mechanism for ensuring compliance to school meal standards. Universal services are important for reaching populations who may otherwise fall through the safety net, and they do deliver impact, especially through the coordinated approach being taken between the early years services – but the interviewees expressed concern that they won't be able to continue delivering that impact without

addressing the capacity constraints they are facing. Of course, this challenge touches on higher-level finance decisions by the national government and competing priorities within the city; however, this doesn't preclude the city from taking a strategic view to see if programmes are functioning well under a universal or targeted services approach, and at the balance of focus between prevention and treatment/service delivery programmes. Indeed, the Birmingham Public Health Green Paper sets out the approach of "proportionate universalism" where "services are available to all with a scale and intensity according to the degree of need.

The Council should lead by example by going beyond the Government Buying Standards and further improving the health and sustainability of the food offering in BCC buildings. This also includes supporting the shift to healthier food in-house with a dedicated programme of work connecting the catering team with staff who have nutritional expertise. The new Whisk platform being used by the catering service provides an opportunity to focus attention on this issue, which can then be built upon to encourage businesses with Birmingham to follow the lead of the council

'Someone within procurement needs to have a really good understanding about nutrition, food and health- but they have to rely on a framework and something is just not happening [in practice]. We have had GBSF for a while, we have had a focus on quality of food for a while, but it is not translating.'

The Council and city planners have an opportunity to build on the success of the hot food takeaway restriction and incorporate more food issues into planning policy via supplemental planning documents and in the next revision of the city plan. The gaps identified in the audit include a health checklist for planning applications, policies to protect healthy food businesses and re-purposing land or sites for food growing and food start-ups. This would also include scoping ways of strengthening the restrictions on hot food takeaways, particularly around schools and on the transport network.

'Now we really want to stimulate the healthier food environment, not just restricting the growth but replacing it with something nutritious, tastier, affordable that people want to buy'

'We have fast food outlets next to bus stops and kids congregate around bus stop on their way home.'

The Council has an opportunity to become a thought leader and influence national advertising policy. The Council has attempted to place advertising restrictions on unhealthy food but faced challenges in securing a tender. Working together with other Local Authorities, the Council has an opportunity to influence national advertising regulations to make such city-level restrictions easier to implement. The Commonwealth Games also open an opportunity for Birmingham to become a leader in this space. The city has a track-record in leading in this way as in the past they joined together with other local authorities to influence advertising on telephone kiosks.

'The telecoms industry was taking advantage of the new legislation, they were in partnership with the big players, and they were using kiosks as effectively a trojan horse to develop advertising portfolios and the city was being inundated in telephone kiosks. I led a lobby across the local authorities, we wrote from the council, I contacted all the other local authorities and got them to lobby, we went into consultation with the DCLG. It took a year, but in March this year the legalisation as changed and that was loophole was closed.'

'That money will go to where the assets are, and where the good assets are. So, if you say, on this asset of the portfolio which is owned by the council, you're not going to get any food advertising on it. All their going to say, is go elsewhere. You will not stop food advertising, it will just go to another portfolio. The only way you can stop it, if you stop it for everybody, it creates a level playing field. I do know that central government are picking up on this agenda.'

Conclusion

The interviews conducted for this audit focused on how to build on the existing good work happening in Birmingham, and identify areas where action is needed. The key policy gaps and opportunities emerging from the policy audit include:

- The Council should set a city-wide plan or Act for healthy food – similar to the Clean Air Act – to provide authority and direction for delivering a healthy food economy in the city.
- Included within the city-wide healthy food plan should be a funded programme of work that draws together departments in the Council working on public health, environmental health and business innovation to build on existing initiatives and explore new routes to encourage healthy food businesses in the city.
- The Council should strengthen existing programmes targeting children including through additional capacity for the food schemes delivered by the coordinated early years services, increasing uptake of the healthy start scheme, increasing uptake of free school meals, ensuring free school meals are provided to all who need them, including children with no recourse to public funds, and scoping a mechanism for ensuring compliance to school meal standards. The Council should lead by example by going beyond the Government Buying Standards and further improving the health and sustainability of the food offering in BCC buildings
- The Council and city planners have an opportunity to build on the success of the hot food takeaway restriction and incorporate more food issues into planning policy via supplemental planning documents and in the next revision of the city plan. The gaps identified in the audit include a health checklist for planning applications, policies to protect healthy food businesses and re-purposing land or sites for food growing and food start-ups. This would also include scoping ways of strengthening the restrictions on hot food takeaways, particularly around schools and on the transport network.
- The Council has attempted to place advertising restrictions on unhealthy food but subsequently faced challenges in securing an advertising contract. Working together with other Local Authorities, the Council has an opportunity to influence national advertising regulations to make city-level restrictions easier to implement.

Compared to the scale of the challenge, the city needs to take much further and wide-reaching action to improve the healthfulness of the food economy. Implementing these recommendations will shift the priority given to healthy food in the Council, mark a significant the step towards more coherent cross-council action on healthy food and draw new healthy food businesses into the city.

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