

Policy Committee

20 October 2025



Reading
Borough Council
Working better with you

Title	Update to the Council's Advertising Policy
Purpose of the report	To make a decision
Report status	Partly open to the public and part exempt - see reasons below
Executive Director/ Statutory Officer Commissioning Report	Emma Gee, Executive Director Economic Growth and Neighbourhood Services
Report author	Martin White (Consultant in Public Health) / Amanda Nyeke (Public Health & Wellbeing Manager)
Lead Councillor	Councillor Rachel Eden, Lead Councillor for Education & Public Health
Council priority	Promote more equal communities in Reading
Recommendations	<ol style="list-style-type: none">1. That the content of the paper is noted, particularly the trend towards local authorities taking action to protect the health of people living in lower income neighbourhoods.2. To agree the adoption of an amendment to the Reading Borough Council Advertising Policy as set out at Appendix 2 for all Council sold advertising opportunities within the borough, including through any Council letting or leasing arrangements.3. Note that subject to adoption of the amended Reading Borough Council Advertising Policy, there will be a phased implementation, that is, as and when existing contractual and property arrangements come up for renewal

The annexe to this report contains exempt information within the meaning of the following paragraph of Part 1 of Schedule 12A of the Local Government Act 1972, as amended by the Local Government (Access to Information) Act 1985 and by the Local Government (Access to information) (Variation) Order 2006:

3. Information relating to the financial or business affairs of any particular person (including the authority holding that information)

And in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information because:

there is prejudice to the Council's Best Value duty if commercial information is shared with the market and which may tend to distort competition

1. Executive Summary

- 1.1. This paper proposes an update to the Council's Advertising Policy which implements its Health in All Policies approach. The proposed Policy update would introduce restrictions on the advertising and promotion of High Fat, Salt and Sugar (HFSS) products across

Council-owned and contracted advertising spaces. It aims to reduce exposure to unhealthy food marketing and encourage the promotion of healthier alternatives. This aligns with best practice already adopted by several local authorities including Barnsley, Bristol, Greenwich, Haringey, Merton and Southwark, Enfield, Bedford, Medway and Transport for London (TfL), with Wokingham Borough Council currently adopting a more extensive approach.

- 1.2. Evidence shows that HFSS products are disproportionately marketed in low-income communities, contributing to health inequalities and poor dietary outcomes. By updating its Advertising Policy, Reading Borough Council can take a proactive step toward creating healthier environments, supporting residents to make healthier choices, and reducing inequalities in health and life expectancy.

2. Policy Context

- 2.1. Reading Borough Council's current Advertising Policy was adopted in 2016. This proposed amendment directly supports the Council Plan 2025–28, which commits to promoting more equal communities. It aligns with the objective to “reduce inequalities in health and life expectancy through its Public Health service” and the ambition to embed health and wellbeing considerations across all policy areas. It may also be seen as an extension of high quality care that demonstrates good leadership and governance establishing good system partnership work that prevents local people from becoming ill before their time.
- 2.2. This Policy update reflects a Health in All Policies (HiAP) approach, which is currently being co-produced with officers across all Directorates. The aim is to embed structural and procedural changes that prioritise prevention, reduce health inequalities and strengthen the good work the Council is already doing around the building blocks of health: environment; housing; transport; worthwhile employment and the food we eat.
- 2.3. The relationship between HFSS products and the obesity epidemic is well established. Council policy has a critical role to play in addressing the commercial determinants of health and preventing premature illness. This proposal builds on national policy direction to act on public health, including the 10 year plan for the NHS which focuses on preventing sickness, not just treating it and local government devolution which emphasises a HiAP approach.
- 2.4. This proposal is further strengthened by recent national developments. The UK Government has confirmed its commitment to implementing restrictions on junk food advertising, reinforcing the direction of travel toward healthier food environments. This national policy shift, welcomed by the Association of Directors of Public Health (ADPH), provides a strong mandate for local authorities like Reading to take bold action. It signals that our proposed Policy is not only evidence-based and locally relevant but also aligned with national priorities and supported by public health leadership across the country. More detail about the pressing local need is outlined below.
- 2.5. Reading's current Advertising Policy, adopted in December 2016, consists of two parts:
 - **Part 1:** Advertising on Council-owned assets (e.g. roundabouts, street light standards, vehicles and the Council's website).
 - **Part 2:** Contracted out advertising arrangements, secured by third-party commercial agents and or partner organisations on Council assets, where the Council has no direct commercial relationship with the advertising party and/or their commissioning agent and the licensee will own the advertising asset.

The proposed changes would introduce specific restrictions on HFSS advertising across both parts of the Policy, aligning Reading with best practice from other local authorities and supporting a whole systems approach to healthy weight.

- 2.6. The Council has license agreements with advertising companies across a range of locations. These include large digital displays, bus shelters, lamp post banners, and roundabouts. The details of these agreements, including revenue and contract end

dates, are commercially sensitive and have therefore been included in **Table 1: Current Advertising Licenses** in **Confidential Financial Annex**

2.7. Proposed Policy Changes

2.8. The current Advertising Policy includes tighter restrictions for Part 1 where the Council is directly issuing a license for the advertiser onto its asset, such as a roundabout or lamp post. Part 2 generally refers to standards imposed by the Advertising Standards Agency. Neither part of the Policy includes specific restrictions on HFSS food promotion.

2.9. It is proposed that the following restrictions would apply to the revised Policy:

2.10. Table 2 Current and Proposed Policy Restrictions

Category	Part 1	Part 2	Policy change?
Political parties or lobbying	Not permitted	Not permitted	No
Gambling and betting services	Not permitted	Permitted with industry guidance displayed	No
Pay-day loans	Not permitted	Not permitted	No
Smoking related products	Not permitted	Not permitted	No
Alcohol	Not permitted	Permitted with industry guidance displayed	No
Advertising with overtly sexual tone	Not permitted	Not permitted	No
Adverts mocking groups of citizens	Not permitted	Not permitted	No
High fat, salt, sugar products	Not permitted	Not permitted	Yes

2.11. Part 1 of the Advertising Policy also reserves the Council the right to consider placements on a case by case basis.

2.12. Rationale for the Change

2.13. Recent public health data profiles from the Department of Health and Social Care Fingertips, a large public health data collection managed by the Office for Health Improvement and Disparities, and a recent rapid Joint Strategic Needs Assessment for the review of the Reading Health and Wellbeing Board, show the scale of problem. It highlights the challenge to the health of local people in terms of the drivers and health outcomes of the obesity epidemic at a local level.

2.14. The environment in which we live and work has positive and negative effects on our health and wellbeing. A feature of the urban environment in Reading is food outlets and the choices they provide. Meals eaten outside of the home tend to be associated with higher calories and larger portion sizes which can make it more challenging to eat healthily. The neighbourhood food environment is an important modifiable determinant of dietary behaviour and obesity.

2.15. In 2024, Reading had 136.9 fast food outlets per 100,000 population, based on a total count of 244 which is worse than 95% of local authorities and worse than the national rate.

2.16. The availability of fast food in our environment is one factor within a complex system that is associated with a range of negative health outcomes and contributes to the obesogenic nature of the environment for some neighbourhoods. Fast food is more

abundantly available in the most deprived areas of England where obesity in children and adults and the associated health conditions, such as type 2 diabetes, hypertension, and heart disease are most prevalent. Current work on the commercial determinants of health provides strong evidence that shows how HFSS products are marketed with greater intensity in areas with higher levels of deprivation.

- 2.17. The rapid Joint Strategic Needs Assessment found that in 2023/24, around 6 out of 10 adults (18+ yrs) in Reading that is 61.6%, were overweight or obese, equivalent to around 86,400 people. Since 2015/16, there has been a relative increase of 9.1% in the prevalence of overweight and obesity, larger than seen nationally (5.9%), however it remains similar to the England average of 64.5%. The percentage of adults (16+ yrs) who reported eating 5 or more portions of fruit and vegetables in Reading was 28.7%. This was the 4th lowest percentage in the South East and the figure has fallen year on year since 2020/21.
- 2.18. The picture in the early life course for children is also a cause for concern. In 2023/24, 21.9% of reception age pupils were overweight or obese, with Reading having the third highest proportion compared with its statistical neighbours. 36.7% of Year 6 pupils are overweight or obese which is higher than the South East average. There is also variation in obesity prevalence between the poorest and richest communities in Reading as illustrated in the graph below.

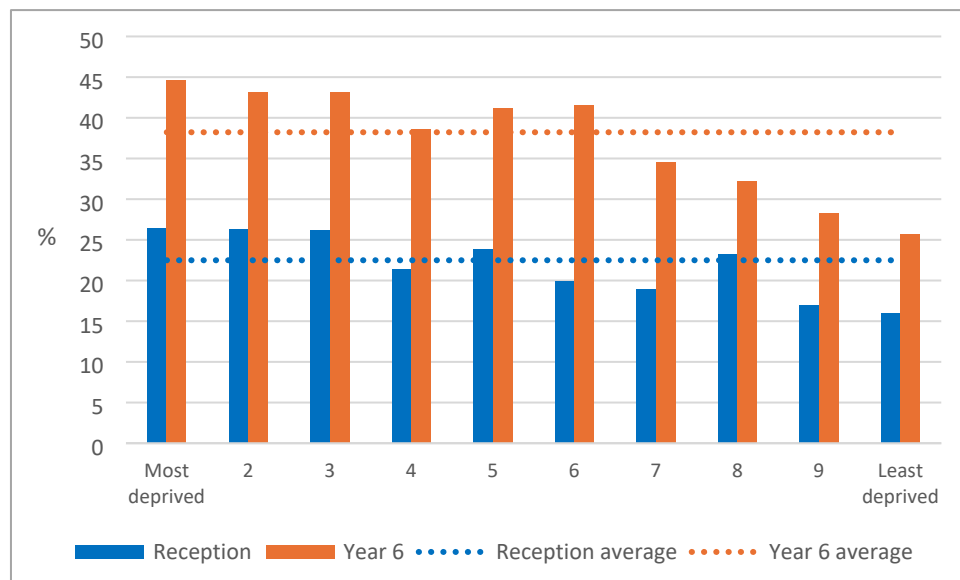


Figure 1 Prevalence of excess weight (overweight or obese) in Reading among Reception and Year 6 children (2021/22 - 2023/24)

- 2.19. These figures underscore the urgent need for action and the public health, moral and political case for action is clear. HFSS products are marketed more intensively in lower income areas, reinforcing unhealthy behaviours and widening health inequalities. Tackling the commercial determinants of health, such as advertising, is a recognised lever for change.

2.20. Health and Economic Benefits

- 2.21. Excess weight (Obesity and overweight) is estimated to cost the UK £126 billion annually, including healthcare, social care, productivity losses, and reduced quality of life ([Frontier Economics for Nesta, 2025](#)). Productivity losses alone account for £30.8 billion, with individuals in the least affluent areas facing 21% higher costs than those in the most affluent.
- 2.22. According to the Obesity Healthcare Goals ([GOV.UK, 2025](#)), the NHS spends over £11.4 billion annually on obesity-related care.

- 2.23. In Reading, where approximately 86,400 adults are overweight or obese, the local share of national costs is estimated at £726 million per year. Of this, the direct cost to Reading Borough Council, primarily through adult social care, is estimated at £72.6 million annually. This estimate is based on proportional modelling using national data from Frontier Economics (2025) and GOV.UK's Obesity Healthcare Goals and reflects the significant financial impact of obesity on local services.
- 2.24. A 2022 economic modelling [study](#) of Transport for London's (TfL) 2019 Healthier Food Advertising Policy focussing on swapping out high fat, salt, and sugar (HFSS) products with healthier alternatives across the Transport for London (TfL) network found:
- Significant health improvements and cost savings
 - Reduced health inequalities
 - Support healthier choices and no increase in costs for individuals or the public sector
 - It represented a highly effective and equitable public health intervention
 - Sustained advertising revenues, with TfL reporting a £2.3 million increase in the first year
 - Strong evidence for scaling such policies to other regions or nationally
- 2.25. The Policy led to positive outcomes including:
- 94,867 fewer individuals with obesity in Greater London (4.8% reduction)
 - 49,145 fewer overweight individuals (1.8% reduction)
 - 2,857 fewer new cases of type 2 diabetes
 - 1,915 fewer cardiovascular disease (CVD) cases
 - Greater positive impact on more deprived groups, contributing to reduced health inequalities.
- 2.26. It is possible that reductions in obesity, diabetes and cardiovascular disease could be higher than reported, as the study did not consider any decreases in childhood obesity which would have likely occurred. The study also showed that the Policy which had been in place since 2019 was expected to save £218 million in NHS healthcare and social care costs over the lifetime of the population.
- 2.27. The TfL example demonstrates that advertisers can adapt by promoting healthier products or shifting to alternative sectors, maintaining commercial viability while supporting public health.
- 2.28. The proposed Policy change offers a cost-effective, evidence-based intervention that supports healthier choices, reduces inequalities, and aligns with Reading's strategic priorities. It is not a ban on brands or businesses, but a shift toward responsible advertising that protects residents' health.

Examples of adverts used before and after Policy implementation



Examples of adverts before (above) and after (below) implementation of the Healthier Food Advertising Policy, based on real-life examples.



3. The Proposal

- 3.1. It is proposed that Reading Borough Council updates its Advertising Policy to include explicit restrictions on the promotion of High Fat, Salt and Sugar (HFSS) products across all Council-controlled advertising spaces.
- 3.2. This change would apply to both:
 - **Part 1:** Direct Council-issued licenses for advertising on assets such as roundabouts, lamp posts, vehicles, and the Council website.
 - **Part 2:** Advertising managed by third-party agents on Council assets, where the Council does not have a direct commercial relationship with the advertiser.
- 3.3. This update would bring Reading in line with best practice adopted by other local authorities and demonstrate a clear commitment to a Health in All Policies approach with a Licensing Policy that accounts for the impact of its decisions on the health of the local population, particularly neighbourhoods which are exposed to the higher intensity promotion of these potentially harmful products.
- 3.4. The proposed healthier food Advertising Policy represents an important step in Reading Borough Council's commitment to creating healthier environments. It would also support the borough's Whole Systems Approach to Healthy Weight. This also supports the ambitions of the Reading Food Strategy and complements the collaborative efforts of the Reading Food Partnership with its shared vision to foster a local environment that enables sustainable access to affordable, healthy, nutritious food, while fostering an environment conducive to encouraging healthy choices.
- 3.5. It should be noted that the revised Policy is not intended to ban brands or businesses, but rather to encourage the advertising of products that support healthier choices and do not contribute to poor health outcomes for our residents.

4. Contribution to Strategic Aims

- 4.1. This proposal supports the Council's strategic aims to promote more equal communities in Reading and to safeguard the health and wellbeing of Reading's residents.

4.2. The proposed healthier food Advertising Policy supports key priorities in Reading Borough Council's Council Plan:

- **A Healthier Life** - by reducing exposure to high fat, salt, and sugar (HFSS) advertising and encouraging healthier choices.
- **A Great Start in Life** - by creating healthier food environments for children and families, especially in areas of deprivation.
- **A Safer Community** - by tackling the commercial drivers of poor health and reducing inequalities to build fairer, more resilient communities.

5. Environmental and Climate Implications

5.1. There are no direct environmental or climate implications arising from this proposal. However, a ban advertising HFSS products may lead toward people adopting more sustainable diets that would benefit the environment

6. Community Engagement

6.1. Not applicable

7. Equality Implications

7.1. An Equality Impact Assessment has been completed and is attached as Appendix 1.

7.2. The assessment concludes that the proposed amendments to the Council's Advertising Policy are likely to have a positive impact across a wide range of groups and the wider community. No negative impacts have been identified.

7.3. It supports efforts to reduce health inequalities, and contributes to creating healthier environments for children, care-experienced individuals, and those with long-term health conditions.

7.4. Monitoring will be carried out through annual reviews of advertising contracts and community health feedback to ensure the Policy continues to promote equity and inclusion.

8. Other Relevant Considerations

8.1. None.

9. Legal Implications

9.1. Section 111 of the Local Government Act 1972 provides that local authorities (subject to any certain statutory restrictions) have the power to do anything calculated to facilitate, or is conducive or incidental to, the discharge of any of their functions.

9.2. The Council has the legal authority to regulate advertising on its properties and platforms. As detailed in the report, there is evidence that exposure to HFSS advertising contributes to unhealthy dietary preferences and increased calorie intake, exacerbating obesity and related disease. Local authorities may rely on such evidence to justify restrictions in advertising as a proportionate response to a legitimate public health aim.

9.3. The Council has various agreements with third parties for the use of advertising space. These agreements restrict certain types of advertising covered by this Policy but not all. In the acknowledgement of contracts and property arrangements already in place, the Policy will only come into effect for all new or renewals of leases and advertising contracts that are let from 1st November 2025. All current advertising providers within the borough will however be contacted and encouraged to adopt the new Advertising Policy in advance of their contract renewal date, particularly those with several years left on their license.

9.4. As implementation will be phased, it will be possible to monitor the commercial impact of the Policy and agree any revisions as appropriate.

- 9.5. The Policy follows the Advertising Standards Agency guidelines and TfL's approach to remove any ambiguity amongst advertising agencies that could render the media estate unviable.

10. Financial Implications

- 10.1. See section 2.20.
- 10.2. Initial discussion with one of the existing digital large format licensees indicates that imposing a HFSS restriction should not have significant impact on revenue. They have however urged caution on any restrictions relating to alcohol, which would have a greater impact on revenue.
- 10.3. The proposed update to the Council's Advertising Policy is expected to have a positive long-term financial impact by contributing to the prevention of obesity-related illness and reducing demand on public services. This expected financial impact is currently not quantifiable.
- 10.4. While the Policy may affect advertising revenue in the short term, evidence from Transport for London's and other local authority's HFSS advertising restrictions shows that revenues were sustained and even increased following implementation. The Council will monitor the financial impact as contracts are renewed and adjust as needed. The financial impact of this proposal will be monitored and reported as part of the Council's revenue budget monitoring process.

11. Timetable for Implementation

- 11.1. Subject to approval, the updated Policy will be implemented in stages depending on the stage of the current licenses.
- The contract for the new bus shelter and FSU tender will be released this autumn and the specification has stated to assume that the Policy will have a HFSS restriction.
 - Changes to the existing licenses for the two large format digital displays will need to be negotiated as the agreed license fee is related to expected advertising revenue and the cost of the installations.
- 11.2. Sponsorship licenses will incorporate the new Policy at the point of license renewal, as outlined above in Table 1.

12. Background Papers

- 12.1. There are none.

Appendices

1. Equality Impact Assessment (EqIA)
2. Proposed revised Advertising Policy. Please note that the proposed change is highlighted
3. Financial Annexe (confidential)