

Consultation
Response Form

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Consultation Questions

Healthy Weight: Healthy Wales

We are seeking views on what will work to prevent and reduce obesity in Wales and help people achieve and maintain a healthy weight.

If you would like to comment on specific proposals under this theme, please use the summary of proposals document.

1. Are you responding as an individual or on behalf of an organisation? If you're responding on behalf of an organisation, please provide the organisation's name.

Individual

Organisation

Name of organisation: Natural Resources Wales

We have identified some proposals for how we think we can help people to achieve and maintain a healthy weight, but we want to know if these are the right proposals, if you know of different approaches which have proven to be effective and how we can best deliver the plan

2. Do you agree that a whole system approach could enable change to take place? If not, why? What are the opportunities, risks and barriers to effective leadership?

Yes, we agree.

LEC1. Developing a long term, whole system approach to address obesity

LEC2. Understanding what works. We want to review the impact and scale of delivery of community-based programmes

A whole system approach is vital to ensure that Wales' response to the national obesity issue is co-ordinated and joined up and that all partners and stakeholders within the system provide an appropriate and consistent response. A fully functioning whole systems approach will require a

comprehensive system review to identify where parts of the 'system' are not functioning – collaborative.

The Parliamentary Review of Health and Social Care in Wales (Interim Report July 2017) states "It is essential that other public services are recognised as key building blocks for sustainable whole health and care systems." (page 24). NRW is an important national partner within the 'whole -the sustainable management of our natural resources and the maintenance of resilient ecosystems provide significant benefits to human health, including those at risk of or suffering with obesity and the physical health issues arising from obesity.

The legislative context in Wales provides a strong foundation on which to build a whole systems approach. Both the Environment (Wales) Act (2016) and the Well Being of Future Generations (Wales) Act (2015) set Duties and requirements for all public sector bodies in Wales:

The Environment (Wales) Act aims to build greater resilience into our ecosystems. The Act sets out Wales' approach to planning and managing natural resources at a national and local level with a general purpose linked to statutory 'principles of sustainable management of natural resources' defined within the Act. The Wellbeing of Future Generations (Wales) Act (WBFG) provides modern legislation for Wales to improve the social, economic, environmental and cultural wellbeing of Wales. The seven Wellbeing Goals provide a mechanism to tackle the challenges we face and help us take better advantage of the potential opportunities for Wales. When making decisions, we must consider the impact they could have on people living their lives in Wales now and in the future. We must ensure the five 'Ways of Working' are followed to help us work together better, avoid repeating past mistakes and to tackle some of the long-term challenges we face.

The WBFG Act established statutory Public Services Boards (PSBs) across local authority areas (19 PSBs, covering 22 Authorities). The purpose of PSBs is to improve the economic, social, environmental and cultural wellbeing in the area by strengthening joint working across all public services in Wales. Natural Resources Wales are a statutory member of each PSB. Each PSB has published a Local Wellbeing Plan setting out its objectives and the steps it will take to meet them. All PSBs have prioritised human health and wellbeing improvement within their plans.

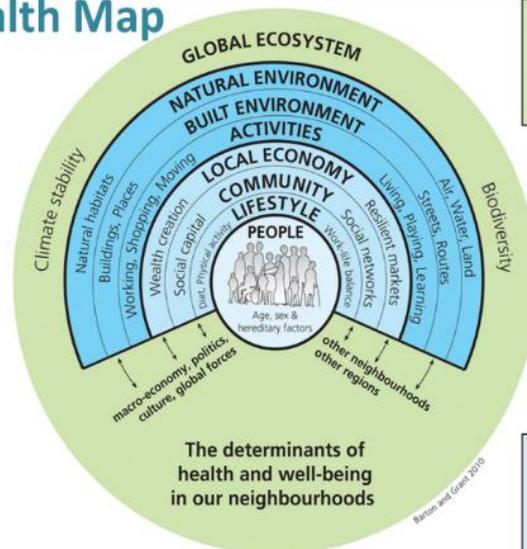
The Public Health Wales Act (2017) takes its lead from the National Strategy for Wales (Prosperity for All) and brings together a range of practical actions for improving and protecting health. It focuses on shaping social conditions that are conducive to good health, and where avoidable health harms can be prevented. The development of an approach to creating and maintaining healthy spaces and places - a built environment that encourages and provides opportunities to make healthy life choices are embedded – is set out in Planning Policy Wales Edition 10 (2018). This ensures that the planning system contributes towards the delivery of sustainable development and

improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Wellbeing of Future Generations (Wales) Act 2015 and other key legislation. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places. PPW promotes action at all levels of the planning process which is conducive to maximising its contribution to the well-being of Wales and its communities.

Taken together, and with the supporting ‘tools’ such as Health Impact Assessments and a Health in Policies approach, recent legislation in Wales provides the building blocks for a whole system approach to become embedded in the way the public sector operate in Wales using the ‘five ways of working’ as set out in the WCFG: prevention; collaboration; involvement; integration and; long term.

We support the recognition by Welsh Government that obesity, often resulting from poor diets (nutrition) and low levels of physical activity, as one of the priority issues needing to be addressed in Wales and would advocate that neither physical inactivity nor poor nutrition be looked at in isolation. We know that a range of factors shape our health - genetics, environment, position in society, income, behaviour patterns and healthcare but the most significant and sustainable actions to address health and wellbeing lie outside the remit of the health service and relate to what are known as the ‘wider determinants of health’ as illustrated in the Barton & Grant Health Map (2006). This Map shows the relationship between human health and the physical, social and economic environment illustrating the close association between the built and natural environment within which people live, the lifestyle choices that are adopted and the availability of accessible services.

Health Map



Global ecosystem - climate stability and biodiversity are vital for human survival. Our ecosystems provide the food we eat, the water we drink and the air we breathe.

The natural and built environment and the activities that we undertake in these provide the basis for health with the provision of equitable, clean and safe environments helping us to thrive.

Working and learning: being engaged in some form of employment, volunteering, education or training is good for individuals, the community and the economy as a contributor towards wellbeing, fulfilment and creativity.

Strong communities and healthy lifestyles: our wellbeing depends on our lifestyle choices, the interactions we have with others, our involvement in community, and our sense of control over our local environment.

Barton, H. and Grant, M. (2006) A health map for the local human habitat. The Journal of the Royal Society for the Promotion of Health, 126(6), pp252-253

Dividing up the Health Map demonstrates the requirement for a whole systems approach to reducing levels of physical inactivity and obesity. It also demonstrates the role of the SMNR approach to improving and providing opportunities for healthy people and places:

The outer circles referring to **'Global ecosystems – climate stability and biodiversity'**; **'natural environment'** and **'built environment'** refer to our infrastructure. The sustainable management of natural resources for their multiple benefits is fundamental - from our seas and coastlines to our uplands and mountains; from our rural to our urban settings.

The inner circles refer to our individual choices, how we interact with other people and how we interact with the environment around us – living, working, playing, learning. We can split these inner circles into two areas to express social participation in and around our natural resources: **'Working and learning'** and **'Strong communities and healthy lifestyles'**

Natural Resources Wales, Sport Wales and Public Health Wales are already focused on working together to improve physical activity levels at the population level. The Wales Physical Activity Partnership is working collaboratively towards this, recognising the synergies across our work.

Recent research (Wales Outdoor Recreation Survey 2016, now part of the National Survey of Wales) shows that whilst 93% of adults took part in outdoor recreation only 22% were frequent participants. This is a significant drop in frequency from the 2011: 27% to 22%. Understanding barriers to healthy choices – both in terms of activity levels and of dietary choice – will be key to developing and maintaining a whole systems approach.

Effective leadership is fundamental to this approach and Welsh Government have already begun this process by setting up the Healthy Weight Healthy Wales Implementation group, with representatives from across Government and key public sector partners (NRW; PHW; SW). It will be vital to ensure continued engagement from across WG to avoid the risks of a siloed approach re-emerging. Clear accountability is key, and the strategy will require delivery across all portfolios. Clear importance is placed on preventative interventions along with a focus on early years. We welcome this approach, referring back to the wider determinants of health model outlined above. Successful delivery of this strategy is not a case of only targeting physical activity levels or dietary choices, it requires the whole system approach to be based on the wider determinants and health in all policies models.

The Welsh Government Statement in response to the 'Access' section of the recent consultation **'Taking Forward Wales's Sustainable Management of Natural Resources'**, given by Hannah Blythyn at the National Access Forum for Wales on 4th April 2019 states that:

WG will progress significant changes to access rights and facilitate an assumption of non-motorised multi-use on access land and the public rights of way network. This will provide users such as cyclists and horse riders with many more opportunities to access the outdoors near to where they live in line with the goals set out in the Wellbeing of Future Generations Act 2015 and complementing the provisions of the Active Travel (Wales) Act and the Environment (Wales) Act.

WG will make information on areas available to the public for outdoor recreation more accessible in order to support the Taking Wales Forward commitment to 'go digital-first in our delivery of government services'. This will benefit local people by demonstrating what is available on their doorstep, as well as tourists considering where to go and what to do.

By improving ease of access to the outdoors, the proposals for higher access rights on footpaths, the statutory Local Authority Rights of Way Improvement Plans (RoWIPs – currently under review by LAs), coupled with the focus in PPW (10) on healthy people and healthy spaces; the opportunities cited in the NRP for increasing levels of green infrastructure in urban and peri urban areas and the 2019/20 NRW remit letter citing woodland creation and improving and creating accessible greenspace close to where people live and work all should be recognised and acknowledged within the 'whole system' approach to obesity for the opportunities they provide for increasing levels of physical activity across Wales.

NRW is a statutory partner on every Public Services Board in Wales (19 in total) alongside the Local Health Boards, local authorities and Fire and Rescue Services. The PSB Well-Being Plans recognise the need to tackle obesity through collaboration, focussing on long-term solutions and preventative approaches. Many of the PSB plans also include objectives around active travel, green infrastructure, access to greenspace, healthy lifestyles etc. As a statutory partner NRW would welcome recognition of the role of PSBs within the whole system approach.

Area Statements, a statutory responsibility for NRW, will set out the issues and potential solutions to achieve the sustainable management of natural resources in Place. These should also be recognised as a part of the whole system approach: the SMNR approach to managing the natural environment delivers multiple and cross cutting benefits across the whole Determinants of Health model and as such should be recognised as a vehicle through which obesogenic environments can be reviewed and reshaped.

LEC1 point 6 appears to limit the agencies agreeing 'a menu of effective strategies' to the health sector – this isn't reflecting a whole system approach, NRW and many other agencies should be a part of those discussions and decisions – demonstrating the collaborative and long-term approach required through legislation.

The limitations of short term funding should be addressed by this strategy. So many effective initiatives are unable to maximise outcomes or scale up, due to limits in funding available/time limits. There should be a focus on the broadest range of 'effective strategies' which can be adapted for individual/group needs, and this is best achieved when a broad range of agencies have the opportunity to input.

3. Are you aware of any good practice locally? How can we build upon and maximise existing practice and resources to support population change across Wales?

Through our partnership funding scheme, NRW is able to support many external groups and organisations who are delivering locally – either directly or indirectly providing opportunities for health improvement including that of lowering obesity levels. One such funded organisation is **Coed Lleol**, who have developed and have delivered over a number of years the Actif Woods program. Please see <https://www.coedlleol.org.uk/>

The new Curriculum for Wales also provides opportunities for benefitting the prevalence of obese young people in Wales. NRW provides curriculum linked resources, teacher training and other collaborative opportunities to embed outdoor learning from early years through to post graduates. Learning in, about and for the environment increases levels of physical activity and encourages development of physical literacy across the age groups.

From 2012- 2016 NRW delivered a WG/BLF/NRW funded **Come Outside! Programme** This programme enabled those experiencing deprivation or disadvantage to take part in outdoor activities (not including sport) which increased physical activity levels and delivered health and wellbeing benefits. The external evaluation of the programme reported *that “the Programme has successfully achieved its original objectives and delivered important learning for future initiatives.”* The evaluation report, case studies etc and a short film can be found on NRW's website:

<https://naturalresources.wales/about-us/our-projects/recreation-and-community-projects/come-outside/?lang=en>

One outcome of Come Outside! was an **Outdoor Activity Skills Learning Programme** which addressed the multiple barriers to developing an active lifestyle, experienced by sedentary people. The programme (accredited with Agored Cymru) offers 4 levels of training; from enabling individuals to become informed, confident and motivated so they can take responsibility for their own enjoyment and safety, whilst doing low-level outdoor activities; up to leader level. Further information is available on NRW's website:

<https://naturalresources.wales/about-us/our-projects/recreation-and-community-projects/the-come-outside-activity-skills-learning-programme/?lang=en>

[The Sport Wales and Public Health Wales 'Healthy and Active' grant scheme will provide further examples of good practice in due course.](#)

4. Do you agree that the proposals set out in HE1- HE5 would make our food and drink environment healthier?

3 - Neither agree/disagree – due to issues identified below

HE1. Supporting Welsh business to reformulate and to develop healthier food choices by providing increased help through Food Innovation Centres.

Accessibility to fresh produce is a problem - especially in rural areas where local shops don't have enough turnover to stock perishable goods. The irony of this is not lost – produce is grown in rural areas but not sold. WG needs to consider supporting/funding projects to address this, including mobile distribution services. There is a need to carry out surveys of availability to identify fresh food 'deserts'. Brexit may have a significant impact on the availability of foodstuff. Land management and agricultural practices in Wales may undergo a significant shift over time. We recommend Welsh Government note their 'Brexit and our Land'

(https://gov.wales/sites/default/files/consultations/2018-07/brexit-and-our-land-consultation-document_0.pdf) publication and that this strategy note the links between land management and food production.

HE2. Limiting the promotion of unhealthy foods.

There is no mention of local authority planning decisions with regard to siting and number of new food outlets, cafes, takeaways, etc. Reference should be made at this point to Planning Policy Wales Edition 10 and the overall presumption towards healthy places, spaces and people.

There is a need to bring a wider range of partners together in each locality to work in a co-ordinated manner on key motivators for healthy lifestyles and obesity prevention.

HE3. Creating a level playing field and making healthy food an affordable option.

Through management and partnership agreement, there is opportunity for local groups and/or community organisations to utilise NRW managed land to support community food projects and increase the availability of fresh, local produce.

Food growing on school grounds can contribute to a number of the **Successful Futures** learning areas (the new national curriculum for Wales), encourage children to make healthier choices and to be physically active whilst doing so. NRW has already developed a series of education and learning resources available to teachers and education professionals that

encourage learning in, learning about and learning for the environment whilst delivering Wales' curricular requirements. Encouraging schools to use their grounds for a variety of activity, including food growing and improving physical literacy, contributes to shift in behaviour and understanding in the longer term. NRW have already worked with schools and the Wales Council for Outdoor Learning to develop resources for developing school grounds for outdoor learning and health activity.

The focus on early years within this strategy will support the development of healthy food choices and improving levels of physical activity throughout the life-course, particularly through the Welsh Government priority of 'the first 1,000 days'.

Affordability of fresh produce is often an issue for people on low incomes and more could be articulated in the strategy to address this. A proportionate approach such as set out in:

<https://www.sustainweb.org/foodcoopstoolkit/bagorboxschemes/>

There is no mention of urban or rural community food growing schemes which often provide opportunity for physical activity and developing social connectedness whilst improving access to fruit and vegetables. Such schemes may be established in areas of lower income and/or higher prevalence of obesity and with more vulnerable groups. These projects need to be of sufficient scale to have an impact.

<https://www.farmgarden.org.uk/your-area/wales>

Post Brexit there needs to be schemes which drive local Welsh produce and the manufacture and supply of healthy, affordable food and drink options. The NRW developed 'Brexit and our Land' document should be referenced.

5. Do you agree that the proposals set out in HE6-HE7 would provide an environment with more opportunities to be active?

3 – Agree

HE6. Creating healthy weight environments.

We support the proposals and the synergy they provide towards delivering a proactive planning approach for healthy built environments. We would suggest that this could be further enhanced by explicit reference to, and inclusion of, the role of the sustainable management of our natural resources in providing, regulating and improving ecosystem resilience. The wider determinants of health model outlined previously demonstrates the clear links between the SMNR and the health benefits (services) provided to people from the environment.

We suggest that the role of NRW in delivering the SMNR approach is acknowledged and embedded within the strategy, currently inclusion is limited to 'Healthy Settings' and specifically in relation to school programmes and

supporting healthy school environments. We believe this does not accurately reflect the range of current and potential opportunities the environment and the SMNR offers the people of Wales to be both physically active and to make healthy food choices.

There is no specific mention of the '**obesogenic environment**' and the range of amenable environmental factors, such as location of amenities and land use patterns, that can contribute to preventing or reducing obesity. The recent PHW Observatory evidence review on obesogenic environments (Obesogenic Environments, understanding the evidence for effective action 2019 <http://www.wales.nhs.uk/sitesplus/documents/888/PHW%20Final%20Obesogenic%20environments%20-%20understanding%20the%20evidence%20for%20effective%20a....pdf>) alongside PPW (10) provides an evidence-based approach to the improvement of the built and natural environment, lowering levels of obesity by enabling and encouraging opportunities for a more active lifestyle.

Creating the infrastructure to support more physically active lives is essential. However, there has to be equal investment in long-term initiatives which connect those who are obese and most at risk of obesity, to the healthy lifestyle choices available to them. Infrastructure and behaviour change initiatives should go hand in hand to be most effective.

Working in a co-productive way (in line with the WFG Act) means involving communities in the development of the local infrastructure. This is one way of connecting communities to the opportunities, ensuring the infrastructure meets the communities' needs, complements existing community assets and provides ownership and acceptance.

In terms of activity provision, we advocate the provision of clear information in accessible formats, which includes what activities are available, where to go and level of difficulty. This joined up approach could provide more than one motivator to do the activity rather than the 'because it's good for you' often heard via national and local media.

Regular mass participation physical activity events, such as Park Run, offer an organised and safe environment for new entrants to the activity as well as for those already confident with high levels of physical activity.

Social prescribing has limited mention in the document and there is no detail on how this could contribute to obesity prevention and supporting people who are overweight. NRW already supports and/or funds such schemes through our partnership funding (see LEC 1) and through facilitating access to land managed by us.

We can learn from programmes like NRW's **Come Outside!** (see 3 above) and work with individuals and communities around their issues, aspirations and priorities, supporting them to see how adopting healthier lifestyles helps them address the issues that are more urgent to them e.g.;

- increasing employability;
- reducing travel costs;
- reducing fruit and veg costs through local co-operatives run by volunteers,
- increasing children and young people's mental and physical development;
- supporting local employers/social enterprises (e.g. food/cycle/etc shops);
- bringing families and communities closer together through shared activity (healthy cooking/play/walking/etc);
- diversionary activities for those involved in anti-social behaviour and substance misuse, etc.

6. Do you agree with the proposals for the following settings (*please identify which setting(s) you wish to comment upon*)?

- Early Years (HS1)
- Schools (HS2)
- Higher/ Further Education (HS3)
- Workplace (HS4)
- NHS (HS5)
- Public Sector (HS6)

3 - Agree

HS1. Building strong foundations in our early years settings.

HS2. Support schools to create whole school healthy weight environments, including the modelling and reinforcement of healthy weight behaviours.

HS3. Recognising that our young people are at risk of becoming overweight or obese as they move to tertiary education

We welcome the proposals outlined in this section of the document and are encouraged that education settings (at all stages) are recognised as of significant importance to encouraging behaviour change.

Early years settings are of vital importance in setting strong foundations for both physical literacy and dietary choices. We would welcome the recognition of the role of the environment in supporting and maintaining these foundations and for the role of outdoor learning in early years settings. A pre-school approach to physical activity and obesity will help tackle the growing concern around levels of childhood inactivity and obesity in Wales.

We have previously stated, within this response, our support and advocacy for a whole systems approach which includes school settings. Alongside our work with Public Health Wales and Sport Wales reviewing and developing our collective opportunities for education and learning based interventions to maximise the potential of existing programmes of work on physical activity and to accelerate the pace of change through the Wales Physical Activity Partnership (WPAP).

The new Curriculum for Wales is an opportunity to embed a whole school approach to healthy weight environments. To support this approach NRW already provide a variety of strategically targeted training days for education early years and school-based professionals in relation to outdoor active learning environments including joint working with PHW on healthy weight programmes. NRW supports schools in relation to outdoor classrooms and has resources to help develop school grounds for outdoor learning and a healthy weight environment

HS4. Supporting businesses to develop good practices on healthy eating and physical activity.

Inactivity in the workplace and the means of travel to and from work is an area that we suggest could be developed further. NRW has instigated Directorate led Health and Well Being Forums tasked with developing a corporate approach to physical health and mental well-being improvement. All employers can support physical activity through e.g. cycling facilities (secure storage, showers, bike purchase schemes, free cycle training, etc); on-site infrastructure e.g. outdoor gyms, walking/running surfaces, gardening/food growing areas on bigger sites, lunchtime activity clubs. Public Sector employers should work with Healthy Working Wales and adopt the Corporate Health Standard approach – NRW are currently working with PHW colleagues to achieve our Bronze Standard with the aim of progressing through all levels.

Employers can collaborate (e.g. a group from a town centre or retail park) with local authority Active Travel planning teams to develop active travel/GI routes connecting the workplaces with e.g. public transport and local walking/cycling routes for active travel and breaktime activity opportunities.

Where employers provide food outlets/concessions on site more emphasis could be placed on healthy food choices and balanced nutrition.

HS5. Local Health Boards and Trusts should act as an exemplar and support their workforces to be healthy and active workforces.

We support the commitment for LHBs and Trusts to be exemplars and support their workforces to be healthy and active. We suggest this should be taken further, in line with the whole systems approach, and would advocate that all public sector employers should act as exemplars to others – providing leadership and proactive opportunities for increasing physical activity levels and lowering obesity in workplace settings.

HS6. Supporting public sector settings to promote healthy food and drink options for staff, visitors and customers by developing guidelines and exploring opportunities to use contractual arrangements to drive change.

HS6 refers to public sector but only in the context of food/drink. We believe that this should be widened - focusing solely on food and drink may result in a

siload approach to employee health and wellbeing policies and guidance. NRW continues to develop as an exemplar employer by addressing health and wellbeing in its widest sense by:

- Adopting a health in all policies approach across our employee functions, policies and procedures and will continue to deliver and develop new employee health improvement and health protection initiatives and actions.
- Engaging with employees in developing internal policy and interventions that impact on their health, e.g. Active Travel policy, workplace and personal carbon positive interventions.
- Encouraging all employees to become advocates for healthy lifestyles in their everyday roles.

A similar approach across the public sector could make a significant contribution to this agenda.

The list of proposed settings on page 23 does not include community and voluntary sector settings. These will be key to engaging with more vulnerable and potentially less engaged people and NRW currently enables and facilitates specific health and wellbeing projects in these settings through partnership funding and our role on PSBs.

7. Do you agree that proposals HP1 – HP2 will support behavioural change and increase conversations about healthy weight through front line services?

3 - Agree

The National Survey of Wales provides a robust evidence base for understanding the drivers and barriers to participation in physical activity. We advocate an evidence-based approach to all behaviour change initiatives alongside the recognition that behaviour change at population level takes time and resources. Short term funding coupled with competing priorities will not help to make the changes required.

The legislation set out in our response to LEC1 goes a long way to providing a strong foundation for change and has required a significant shift across the public sector ways of working. NRW, SW and PHW have begun to develop proposals for a physical activity observatory which will provide collective insights and evidence together in a way that has not been possible previously. Analyses of this evidence base will provide a better understanding of physical activity levels in Wales and the causal relationship with the wider determinants of health.

There should be a better understanding of **technological solutions** in helping people to lose weight or be more active in Wales and some evidence for this is provided through the links below.

<https://www.healthevidence.org/view-article.aspx?a=efficacy-technology-based-interventions-obesity-prevention-adolescents-28036>

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3618375/>

Again we would suggest reflecting this strategy through the wider determinants of health model rather than focusing on front line health services only. This will also help embed a whole systems approach. A move towards a more preventative approach to health and wellbeing needs to be recognised – there is a need to target groups ‘at risk’ of developing unhealthy lifestyles which means involving sectors beyond health care and food, drink and activity providers (see note above in 2 about understanding the broad direct/indirect root causes and bringing a wider range of partners together).

Wider planning decisions and the impacts on health through the SMNR can help to tackle obesity by encouraging active communities through e.g. the protection, addition and design of natural resources; placemaking; provision of and access to cycling, walking and running.

PHW (who will “design and deliver behaviour change programmes”) should be encouraged to work with a wide range of partners, including continuing to work with NRW and the wider environment/outdoor sector around improving physical activity levels.

8. Do you agree that proposals HP3 – HP4 will enable children and families to support a healthy weight?

4 – Agree

HP3. The 10 Steps to a Healthy Weight programme will provide practical support and information for parents via a range of evidenced based interventions and positive parenting campaigns.

NRW can contribute to step 6 in particular through providing advice on urban design and incorporating specific design elements into outdoor capital build projects to encourage physical activity. A key priority in the Natural Resources Policy (2018) is to improve and enhance green infrastructure in and around urban and peri urban areas.

9. Do you agree that proposal HP5 will develop a clinical pathway to ensure those who are overweight or obese can access the right kind of support?

3 – Neither agree or disagree

HP5. Review and implement a clinical obesity pathway ensuring it meets current standards, provides clear definitions, sets clear transition points across each level and that there is explicit governance and accountability for delivery.

It is not clear whether this is referring to **All Wales Pathway** (2010). Assuming it does then this term should be used and the All Wales Pathway needs to be reviewed across all tiers. If this is just Tier 3 & 4 it is suggested that there are clear referral mechanisms into Tier 1 & 2 activities as appropriate once structured clinical programmes have been completed. The activities in Tier 1 & 2 need to be appropriately targeted and of sufficient scale.

10. This question relates to the impact the proposals might have on certain groups. Do you think the proposals in this consultation document might have an effect on the following?

- o Those living in rural areas
- o Welsh language
- o Equality
 - Age
 - People with disabilities
 - Sex
 - Transgender
 - Marriage or civil partnerships
 - Pregnancy and maternity
 - Race
 - Religion
 - Sexual orientation

o Children and young people

People in rural areas – although less at risk of obesity because they are likely to be more active – may have difficulty accessing fresh fruit and veg *see above) and will most likely have difficulties accessing weight management services.

There is no reference to older people as a priority group despite the fact that 63% of people of retirement age in Wales are overweight or obese and 23% are obese (PHW 2018)

Similarly, there is no reference to ethnicity and the risk of being overweight or obese despite the fact that black adults are the most likely out of all ethnic groups to be overweight or obese (PHE 2018)¹. However, it needs to be noted that the relationship between ethnicity and weight is not straightforward.²

There is no specific reference to people with mental health problems being at greater risk of obesity and also no reference to people with learning disabilities being at greater risk. There is a similar increased risk for people with physical disabilities. Understanding who is most at risk of obesity supports the

¹ No data available online from PHW

² Ethnicity and Obesity National Obesity Observatory (2011)

development of more tailored projects and programmes aimed at prevention and working with families not just individuals.

Pregnant women who are obese/severely obese need specialist support.

11. Do you have any other comments about these proposals?

There is very little mention of the data or knowledge available or the gaps in data with regard to mapping the connection between the prevalence of child and adult obesity in specific neighbourhoods or communities (using survey or GP anonymised data) and access and distance to facilities, outdoor spaces, support or services to prevent or address this. We would like to see GIS used to map these connections to support planning and developments in urban and more rural areas. It may be possible to develop a tool to rate different localities in terms of how obesogenic they are. Academic support may be available through local universities

Although the consultation refers to mental health in terms of its association with obesity, there is no reference to activities to reduce depression and anxiety – for example being in a natural environment

There is no reference to people with co-morbidities e.g. diabetes and obesity and how they will be supported.

There is no mention of using the media and social media to promote regular positive stories about local people successfully losing weight and how they have achieved this. Social media generally needs to be explored as a support system for people.

There is a need to build knowledge and understand cultural issues and sensitivities in terms of which interventions work best with specific population groups e.g.; males v. females; young people v. older people, people from ethnic minorities etc. This evidence needs to be consistent and made available for organisations providing interventions.

There is generally insufficient emphasis on physical activity in the document despite the evidence of the role that physical activity plays in relation to obesity prevention. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5902009/>

Although the current evidence with regard to access to green spaces and obesity prevention and/or 'treatment' interventions is limited and in some cases inconclusive, (PHW Obesogenic environment evidence review technical report 2019), preventative programmes and actions should still take place and be robustly evaluated with an academic partner. We also note that the PHW evidence relates to urban green spaces and parks.

All functions across NRW have a legal duty to seek to maintain and enhance biodiversity and promote ecosystem resilience. We recognise how biodiversity loss can have significant direct human health impacts if ecosystem services

no longer meet social needs. We can advise how biodiversity and outdoor physical activity opportunities can be maximised and that '*nature-based solutions can offer affordable, sustainable, and reproducible benefits across a range of areas affecting public health and social well-being*'. See IEEP report: [https://ieep.eu/uploads/articles/attachments/2b933ebe-a153-4ba8-b6fb-ac615ad9a445/Health and Social Benefits of Nature - Final Report Executive Summary sent.pdf?v=63664509964](https://ieep.eu/uploads/articles/attachments/2b933ebe-a153-4ba8-b6fb-ac615ad9a445/Health_and_Social_Benefits_of_Nature_-_Final_Report_Executive_Summary_sent.pdf?v=63664509964)

We would like to draw attention to the links and potential in relation to obesity prevention with Area Statements, the Nature Recovery Plan for Wales and Wales Environment Act 2016.

There needs to be greater emphasis on the document in terms of providing accessible green spaces which meet a quality standard. Everybody needs access to suitable quality green space within walking distance – but in particular people on low incomes and those at greater risk of poor physical and mental health. Planning Policy Wales, Technical Advice Note (TAN) 16

The Minister for Environment, Energy and Rural Affairs has recently explicitly requested that NRW should '*support measures to create local accessible green spaces*'. (NRW Remit letter for 2019 – 20).

Green Flag Awards assess this standard using international standard but generally it is only applied to specific larger parks.

Children need to be able to play vigorously & safely. Current play areas are not necessarily within walking distance of children's homes. This needs to be assessed locally. This is the responsibility of LAs – NRW can advise on nature-based learning and play.

Access to safe, clean playing fields is also an important issue - Planning Policy Wales, Technical Advice Note 16. There is a need to remove actual and perceived barriers to access (including crime) otherwise people will not access greenspace.

Good practice example - Putting the Park into Peulwys Estate Colwyn Bay – Cartrefi Conwy

We agree that the planning system has an important role to play in helping to deliver healthier places. Planning Policy Wales 10 (PPW) already actively encourages planning authorities to do so through their planning decisions.

In our view, the Green Infrastructure Assessments (GIAs) proposed in PPW 10 have the potential to be a key tool within this

To deliver the active environments proposed in this consultation, it would in our view, be helpful if the upcoming guidance on GIAs made strong links to the health agenda. We also suggest that GIAs should include an assessment of the overall need for green infrastructure in each local authority, with the aim

of ensuring that areas with greater health deprivation are adequately covered in these assessments.

To help in this work, we would welcome the opportunity to work with Welsh Government on exploring what evidence is currently available on accessible quality natural green spaces, identify any gaps or difficulties in evidence gathering, and consider potential solutions.

We are aware that there are a number of barriers to implementing Green Infrastructure. Green spaces in urban areas are under a significant amount of development pressure and where necessary these should be given adequate protection through the planning system.

To create the active environments proposed in this consultation, it will also be important to consider the quality of the green space, as well as the quantity of green space, particularly when it comes to creating new areas of green space alongside development. For example, some developers may wish to use steeper areas of land to create green space alongside the development, which is unlikely to contribute much to creating an active environment.

Finally, there are a number of references in the consultation document to creating high quality green spaces around housing developments. We suggest that similar areas could usefully be created around centres of employment.

The consultation document significantly undersells NRW's role as a partner, facilitator, advisor and land manager in relation to SMNR and the generation of well-being benefits linked to use and enjoyment of the natural environment (i.e. promoting healthy lifestyles and mental well-being through physical activity, recreation, education and learning, connection with nature etc).

NRW key corporate and strategic priorities and documents outline a commitment to health and wellbeing as do NRW's Wellbeing Objectives and Vital Nature (e.g. see p13)

<https://cdn.naturalresources.wales/media/686482/vital-nature-final-230718-english.pdf?mode=pad&rnd=13179228355000000>

For example, in July 2018 NRW published a document on the role and purpose of the Welsh Government Woodland Estate (WGWE) over the next 25 years (it links to WG's Woodlands for Wales Strategy). See <https://naturalresourceswales.gov.uk/about-us/what-we-do/welsh-government-woodland-estate/our-vision-for-the-welsh-government-woodland-estate/?lang=en> and specifically

https://cdn.naturalresources.wales/media/686131/purpose-and-role-of-wgwe_web-version_eng.pdf?mode=pad&rnd=13176558564000000

This document identifies 10 key priorities, one of which (No. 7) states that *'Access and recreation opportunities on the WGWE will be developed and maintained to support mental and physical health and well-being, providing high quality settings for education and learning and to further Wales'*

appreciation of its culture and heritage'. It also contains a specific section (5.5, p17-18) that talks about cultural and social well-being, and specifically mentions obesity.

The document also commits NRW to working more collaboratively with partners and stakeholders to maximise the generation of well-being benefits from the WGWE and says that Area Statements (which links me nicely onto my next point!) will be a key mechanism for engagement and collaboration, as well as our work with Public Service Boards on Local Well-Being Plans.

In relation to Area Statements, health inequalities are identified as an Emerging Theme in a number of areas in terms of the opportunities that natural resources provide to support preventative approaches to deliver health outcomes and reduce inequality, e.g. via Green Infrastructure.

A disconnection with nature is also referred to, as is the role of new woodland creation to improve opportunities for biodiversity, recreation and communities.