



National Planning Framework 4 Call for Ideas

RESPONDENT INFORMATION FORM

Please Note this form **must** be completed and returned with your response.

Please send responses to scotplan@gov.scot. Further information about the National Planning Framework is available at www.transformingplanning.scot

To find out how we handle your personal data, please see our privacy policy: <https://beta.gov.scot/privacy/>

Are you responding as an individual or an organisation?

- Individual
 Organisation

Full name or organisation's name

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The Scottish Government would like your permission to publish your response. Please indicate your publishing preference:

- Publish response with name
 Publish response only (without name)
 Do not publish response

Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the call for ideas.

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

No



A Consultation response from Obesity Action Scotland – NPF 4 Call for Ideas

About Us

Obesity Action Scotland was established in summer 2015 to provide clinical leadership and independent advocacy on preventing and reducing overweight and obesity in Scotland. It is hosted by the Royal College of Physicians and Surgeons of Glasgow on behalf of the Academy of Medical Royal Colleges and Faculties in Scotland.

The main aims of the Unit are:

- To raise awareness and understanding of what drives obesity and the health problems associated with obesity and overweight with health practitioners, policy makers and the public
- To evaluate current research and identify strategies to prevent obesity and overweight based on the best available evidence
- To work with key organisations in Scotland, the rest of the UK and worldwide, to promote healthy weight and wellbeing

The Steering Group of Obesity Action Scotland has members across various disciplines involved in preventing and tackling obesity and its consequences e.g. clinicians, public health experts, epidemiologists, nutritionists and dieticians, GPs and weight management experts.

A Scotland in 2050 – our vision and the role of planning

Our vision for 2050 is of a Scotland where everyone has equal opportunity to be a healthy weight. This will require a fundamental shift in many areas of public policy and planning is one of the key areas. NPF4 provides a unique opportunity to create healthy weight environments that can have a positive impact on the health of our nation.

The Lancet series in 2011 urged us to create a systems approach to tackling obesity arguing that business as usual was no longer acceptable in terms of its cost on population health.ⁱ Such an approach requires all sectors to be involved including planning. Policy coherence has been identified as a key factor in influencing food systemsⁱⁱ. We must ensure that all policies reinforce each other and where we have commitments from Scottish Government to tackle overweight and obesity and improve diet we must ensure that policies elsewhere in Scottish Government reinforce rather than undermine that commitment. We must also ensure that the opportunity to improve our environment to tackle climate change deliver the double benefit of increased access to healthy food and greater opportunities for active travel.

Accessing a healthy diet and maintaining a healthy weight are key public health preventative measures we must take in Scotland to tackle the challenges we face around non-communicable diseases such as type 2 diabetes and cancer. Diet, Physical Activity and Healthy weight is a public health priority of Scottish Government and as such all governmental policies must take steps to address these issues.

Moreover, Scottish Government subscribed to the UN Sustainable Development Goalsⁱⁱⁱ and three goals especially could be supported through the NPF4. First, goal 9 (industry, innovation and infrastructure) covers building resilient infrastructure to support economic development and human well-being, with a focus on affordable and equitable access for all. Second, goal 3 (good health and wellbeing) includes reduction in the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination. Finally, goal 10 (reduced inequalities) covers empowering and promoting the social inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status; and ensuring equal opportunity by promoting appropriate legislation, policies and action in this regard.

How can planning best support our quality of life, health and wellbeing now and in the future?

Planning and the Food System

The food system is the interconnected system of everything and everybody that it influences and is influenced by, including the activities involved in bringing food from farm to fork and beyond.^{iv} Planning is a key influencer on the activities involved in bringing food from farm to fork. Planning could influence food systems in many ways, for example by determining the location of food growing or manufacturing areas, by supporting distribution and transport systems, effects on quality of air, water and soil, or influencing the location of retail and out of home food sources.

City University of London researchers have proposed a map of the food system that shows the interaction between the dimensions of environment, human health, society and economy.^v Understanding where planning and food systems have potential to work together or against each other is crucial for achievement of long-term goals.

Food is a fundamental need for our health and wellbeing and the planning system has a huge influence on how we access food and what type of food we access. If we are to ensure a healthy, resilient population, we need to ensure the planning system plays its role in enabling access to healthy, nutritious food in a variety of ways^{vi}:

- Easily accessible retail and out of home premises at a density that reflects the needs of the local population, for example incentivising healthy food retailers to enter low-income areas
- Enabling and supporting the supply and sale of healthy nutritious fresh food
- Preventing and discouraging oversupply of foods high in fat, sugar and salt, for example through preventing positioning of unhealthy food outlets where children gather

How can planning influence the Scottish diet?

Our current diet in Scotland is poor^{vii} and that is the result of a number of factors. The density, ease of opening and situation of outlets selling poor nutritional quality food has been a factor in changing our diets.

By 2050 it will be important that the planning system has taken steps to ensure the number and position of food outlets is appropriate and that these outlets sell nutritious, healthy foods. It will be crucial that the environment around us encourages us to eat healthily. It must also ensure we have a positive relationship with healthy food through increased access to and number of allotments, adequate garden space for growing and increased social interaction around food through outdoor eating areas and places for people to gather and share food socially. We must also ensure that outdoor advertising, signage and hoardings encourage and promote healthy eating and a healthy diet.

Local authorities and local health boards are currently often frustrated by a perceived lack of power to control the density and position of hot food takeaways. Scottish Government commissioned research^{viii}, which identified that

“It can also be concluded from the research that certain Planning Authorities in England, are seeking to control the clustering and density of hot food takeaway uses on health grounds or to ensure the provision of a choice of fresh, nutritious food types for local communities. This is not the case in Scotland where the clustering and density of hot food takeaways is currently controlled for other reasons e.g. promotion of town centre viability and protection against anti-social behaviour.”

We must ensure that a new planning system enables us to tackle these currently identified issues as well as achieving the best food and health outcomes possible.

Achieving Healthy Weight Environments

We understand that the place standard tool is currently being considered as the most useful mechanism for integrating health and place issues within NPF 4.^{ix} However we would caution against wholesale transference of the themes alone on an assumption that they present a comprehensive mechanism for tackling the health and wellbeing element of the planning system.

The tool was designed for a very different purpose and whilst we agree with and advocate policy coherence, the use of the place standard headings only would leave some significant gaps. At the time of development of the place standard the understanding of the complexity of the food system and the concept of “food environment” were not fully developed and it is therefore significantly lacking in this area. It is also designed as a mechanism for framing conversations and action at local level and would still need some

significant development to provide a useful tool to local planners to enable strategic and operational decisions to be made on a day to day basis.

The Town and Country Planning Association (TCPA) in England have completed a significant amount of work in linking planning and health; and their document “Planning Healthy-Weight Environments” should be used as a source of material for NPF 4 content.^x It acknowledges that

“Local authority planners have a key role in creating places that enable people to achieve and maintain a healthy weight.”

Obesity is often described as a normal response to an abnormal environment. Our minds and bodies respond to the environments we live in and unless they allow us to make good physical activity and diet related choices easily, then we are set to put on weight. We must create places that are healthy –weight environments and these are places that promote physical activity of all sorts and ensure that sustainable and active travel is built into everyday life. They should also help people access and choose healthier goods such as food and drink that will enable them to choose a balanced diet. The TCPA document, as well as the guidance they issued jointly with the Public Health England and other stakeholders,^{xi} identify six key themes:

- Movement and access
- Open spaces, recreation and play
- Food
- Neighbourhood spaces
- Building Design
- Local economy

Each of these themes is supported by elements that can help with design and implementation.

However, the document also highlights the practical difficulties that planners have faced in ensuring healthy food and drink is a material consideration due to a lack of definition to make it a material consideration. We have the opportunity here with NPF4 to ensure these issues are addressed now and that we set the expectation and ability to adequately consider these issues so that application and delivery are smooth at local level.

There is also clear evidence that has been set out by Public Health England through an umbrella review of the existing evidence on the associations between the built and natural environment and health outcomes.^{xii} It is also presented in terms of five themes:

- Neighbourhood design
- Housing
- Food environment
- Natural and sustainable environments
- Transport

We would urge the consideration of these sources of information in the process of drafting the themes of the new NPF4 as it seeks to address population health.

ⁱ <https://www.thelancet.com/series/obesity-2011>

ⁱⁱⁱ https://www.city.ac.uk/_data/assets/pdf_file/0018/504621/7643_Brief-5_Policy_coherence_in_food_systems_WEB_SP.pdf

ⁱⁱⁱ <https://sustainabledevelopment.un.org/?menu=1300>

^{iv} https://www.city.ac.uk/_data/assets/pdf_file/0008/471599/7643_Brief-2_What-is-the-food-system-A-food-policy-perspective_WEB_SP.pdf

^v Parsons, K., Hawkes, C. and Wells, R. (2019) Brief 2. What is the food system? A Food policy perspective. In: Rethinking Food Policy: A Fresh Approach to Policy and Practice. London.

^{vi} <https://www.thelancet.com/series/obesity-2015>

^{vii} <https://www.foodstandards.gov.scot/publications-and-research/publications/the-scottish-diet-it-needs-to-change-2018-update>

^{viii} The Scottish Government. (2018) Relationship between food environment and planning system: research summary

^{ix} Beautyman I, Lowther M. How Can Place Best Support Scotland's Health and Wellbeing? – Webinar.

<https://youtu.be/BJ3UPxzKqLI>

^x TCPA and PHE (2014) Planning Healthy-Weight Environments. A TCPA reuniting health with planning project. https://www.london.gov.uk/sites/default/files/osd53_planning_healthy_weight_environments.pdf

^{xi} PHE et al (2020) Using the planning system to promote healthy weight environments. Guidance and supplementary planning document template for local authority public health and planning teams.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863821/PHE_Planning_healthy_weight_environments_guidance_1_.pdf

^{xii} Public Health England (2017) Spatial Planning for Health. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729727/spatial_planning_for_health.pdf