



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

Scottish Obesity Alliance

Phone number

0141 465 7341

Address

c/o Royal College of Physicians and Surgeons of Glasgow. 232-242 St Vincent Street, Glasgow

Postcode

G2 5RJ

Email

info@scottishobesityalliance.org

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- Do not publish response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If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the call for ideas.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



The Scottish Obesity Alliance is a forum for organisations to collaborate to influence policy and practice on obesity prevention in Scotland. We work together to influence the Scottish and UK Governments policy on overweight and obesity.

Our vision is for:

A Scotland which promotes health and wellbeing.

A Scotland where healthy food and physical activity choices are easy, acceptable, affordable and sustainable for all.

We seek to do this by:

- advocacy and communication
- identifying policy-relevant evidence and solutions
- sharing knowledge and evidence between members

Creating healthy-weight environments

At any one time the Scottish Obesity Alliance works on policy priorities, as recommended by the Executive Group and agreed by members at an Annual General Meeting. Earlier this year, members of the group confirmed support for planning for a healthy-weight environment as a policy priority for a second year.

Significant action is needed to create environments that enable healthy food and physical activity behaviours for everyone. The current obesogenic environment makes it difficult for people of all ages to make healthy choices: there are less opportunities to walk and take enough exercise in our daily lives, and there is an over-emphasis on food and drink products that contain excessive amounts of calories, fat, sugar and salt.

Scotland has some of the highest incidences of obesity across OECD countries¹ - currently 65% of adults are overweight or obese, and 29% of children aged 2 to 15 years old are at risk of being overweight including 16% who are at risk of being obese. Overweight and obesity has become a major health issue, negatively impacting on quality of life, affecting productivity and often leading to serious chronic conditions such as type 2 diabetes, cardiovascular disease and cancer.

¹ The Scottish Government. (2018) The Scottish Health Survey, 2018, volume 1 - main report. <https://www.gov.scot/publications/scottish-health-survey-2018-volume-1-main-report/>

Addressing the obesity crisis is complex and requires a multi-faceted approach. We must make connections between policy areas, different levels of government and the public, private and third sectors - this includes planning. Planning plays an important role in helping to shape our neighbourhoods, towns and cities to increase the opportunities for physical activity as well as tackle the availability of food and drink high in fat, sugar and salt (HFSS). NPF4 provides a unique opportunity to create healthy weight environments that can have a positive impact on the health of our nation.

Engaging with members of the Scottish Obesity Alliance

We have previously discussed our engagement in the review process of the National Planning Framework with the national team². In this submission, we offer again the opportunity to engage with our members all of whom are able to provide relevant feedback on policy thinking. The Scottish Obesity Alliance is composed of a number of organisations, including leading national health charities, medical royal colleges, campaign groups and professional bodies. These organisations work across diet and nutrition, physical activity, the built environment and tackling inequalities including work with children and young people, and take a broad interest in health and public health not just reducing overweight and obesity. Our current membership is now 26, and a list of those members is attached for your information. It is imperative that a broad range of stakeholders, drawn from the third sector and beyond, working in health and public health are involved in the review of this policy framework and its development. 'People – supporting health and wellbeing' is one of the priority areas of the National Planning Framework 4.

To accept our offer of engaging directly with our members please contact us.

Principles for planning a healthy-weight environment

The Scottish Obesity Alliance refers to the work of the Town and Country Planning Association (TCPA) in England in our advocacy on creating healthy weight environments. In particular we talk about the report 'Planning Healthy-Weight Environments'³ which identifies six key themes to create places that are healthy-weight environments and demonstrates how each can be designed and implemented. The themes include:

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

² Meeting with Simon Bonsall. (2019) Planning and Architecture Scottish Government. 15th July 2019.

³ TCPA. (2014) Planning Healthy-weight environments.

<https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=7166d749-288a-4306-bb74-10b6c4ffd460>

It identifies local authority planners as key in creating places that support people to achieve and maintain a healthy weight, however highlights the practical difficulties they have faced in ensuring healthy food and drink is a material consideration due to a lack of definition.

The TCPA has undertaken a significant body of work on planning and health and we ask there is due consideration of this work and the six themes as key health principles in the development of the NPF4 to best support the quality of life, health and wellbeing of people in Scotland in the future.

Key considerations under each question posed

This submission has been informed by members of the Scottish Obesity Alliance.

1. What development will we need to address climate change?

We believe that taking actions to address climate change are important. Given the climate emergency we face, we cannot settle for business as usual. Actions such as [1] reducing private car use [2] increasing local greenspace and [3] introducing car-free zones as well as [4] increasing the consumption of local and seasonal fruit and vegetables and [5] reducing meat and dairy to address overweight and obesity also deliver co-benefits for our climate.

Food is a fundamental need for our health and wellbeing and there is consensus on the need for a healthier, more sustainable, and more equitable food system. Our current food system encourages consumption, advertising and promotion of products HFSS ignoring environmentally friendly agricultural practices, availability and affordability of fresh products and necessary skills to cook and prepare food. City of London researchers proposed a map of the food system that shows the interaction between the environment, human health, society and economy⁴. Understanding where planning and food systems have potential to work together or against each other is critical for achieving long term goals. Planning can influence the food system 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 location of retail and out of home food sources. Planning can support access to healthy, nutritious food over foods HFSS in easily accessible retail and out of home premises in or near local communities.

These ideas can be explored further and extensively in the ground-breaking report from The Lancet Commission on Obesity 'The Global Syndemic of Obesity, Undernutrition and Climate Change'⁵. The report explores the co-existence of the three challenges, highlighting that they are driven by the same underlying drivers within the same systems including urban design, land use, food and transport. The report highlights triple duty actions that can address all three of these global health challenges for humans, the environment and our planet.

⁴ 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.

⁵ Swinburn et al. (2018) 'The Global Syndemic of Obesity, Undernutrition, and Climate Change: The Lancet Commission report' <https://www.thelancet.com/commissions/global-syndemic>.

2. How can planning best support our quality of life, health and wellbeing in the future? (people)

We believe the NPF4 should acknowledge health in its broadest sense, rather than taking a focus on healthcare services and facilities. Health is determined by a complex interaction between individual characteristics, lifestyle and the physical, social and economic environment⁶. Most experts agree that these 'broader determinants of health' are more important than health care in ensuring a healthy population.

Improving the active environment is an important aspect in creating healthy-weight environments (please see our views on this in Q5), but our food environment is also a major determinant of long-term health, influencing people's ability to lead a healthy life⁷. Significant action needs to be taken to improve and rebalance our food environment if we are to reduce overweight and obesity and vastly improve our nation's health. Scotland's diet is poor overall and people living in the most deprived areas have an even poorer diet⁸. The availability of fast food outlets are clustered in more deprived areas⁹. Planning legislation has the potential to limit the proliferation of unhealthy food outlets.

We believe the NPF4 should require local authorities to consider health impacts when considering fast food takeaway applications. Analysis published by the Scottish Government in November 2018¹⁰ identified that despite evidence on the presence and availability of fast food outlets on obesity being unclear and conflicting at this time, "there is a growing body of research across countries, including Scotland, however which demonstrates that food environments around schools play an important role in dietary choice and quality of food available to students". In particular, that "access to outlets selling healthy food was noted as decreasing the odds of being overweight or obese". The report identified the absence of a planning policy framework in Scotland against which to determine applications for fast food outlets on health grounds, and cited the outcome of one particular appeal that noted it was not considered reasonable in planning terms for the Council to refuse the application on health grounds.

There are examples of good practice elsewhere in the UK, particularly in England. The House of Commons Health and Social Care Committee called for planning law reform to enable local authorities to limit the proliferation of unhealthy food outlets¹¹. In certain planning authorities the local food environment around schools and other sensitive settings (i.e.

⁶ Dahlgren, G. and Whitehead, M. (1993) Tackling inequalities in health: what can we learn from what has been tried?

⁷ Townshend, T. & Lake, A. (2017) Obesogenic environments: current evidence of the built and food environments <https://www.ncbi.nlm.nih.gov/pubmed/28449616> & NHS Health Scotland (2016), Place and Communities

⁸ Food Standards Scotland. (2018) Situation Report: The Scottish Diet: It needs to change. 2018 update.

⁹ Macdonald, L. et al. (2018) 'Do "environmental bads" such as alcohol, fast food, tobacco, and gambling outlets cluster and co-locate in more deprived areas of Glasgow City, Scotland?', Health and Place, 51, pp. 224–231.

¹⁰ The Scottish Government. (2018) Relationship between food environment and planning system: research summary

¹¹ Health and Social Care Committee (2018) Childhood obesity: Time for action. Eight report of session 2017-19

leisure centres, community centres, parks) are controlled, generally through Development Plans and Supplementary Planning Documents, based on a robust evidence base.

There is further evidence showing good practice and outcomes in Gateshead and Newcastle. The Gateshead and Newcastle Core Strategy and Urban Core Plan (2015)¹² set out an intention to improve access to healthier food and control the location of, and access to, unhealthy food outlets. A supplementary planning document (SPD) was later published in 2016, to support Newcastle Council's strategic aim of tackling unhealthy lifestyles – including unhealthy eating and obesity¹³. The SPD explicitly references the 2012 National Planning Policy Framework for England¹⁴, highlighting how planning can play an important role in creating healthy, inclusive communities, while also highlighting how the NPPF aims to ensure the vitality of town centres (paragraphs 7 and 69). It also references the 2014 Planning Practice Guidance (PPG)¹⁵, which provides greater clarity on the planning system. It outlines that the PPG notes that “the built and natural environments are major determinants to health and wellbeing”. Since these measures were introduced, no new planning applications have been approved¹⁶. An analysis by Newcastle Council of the reasons include the impact on residential amenity, over concentration and clustering, the size falling within the exclusion zone of a school, and highway issues¹⁷. No councils have yet reported any unintended consequences from making their planning guidance more robust.

The Royal Society of Public Health (RSPH) suggests incorporating measures for restricting takeaway outlets allowed in area as follows¹⁸:

- Planning restrictions within 400m of all primary and secondary schools
- A ban on unhealthy fast food discounts for children
- Improvements to green spaces
- Improved accessibility to active travel to and from school, including cycle storage at schools

Some councils in England have introduced distance-based restrictions, with some opting for 400 metres – the equivalent of a 10-minute walk¹⁹. An impact study on takeaways near schools in Brighton and Hove concluded that 400 metres was insufficient, and 800 metres would have a greater impact²⁰.

¹² Available at https://www.newcastle.gov.uk/sites/default/files/2019-01/planning_for_the_future_core_strategy_and_urban_core_plan_2010-2030.pdf

¹³ Available at https://newcastle.gov.uk/sites/default/files/2019-01/hot_food_takeaway_spd_-_october_2016_-_final_0.pdf

¹⁴ Ministry of Housing, Communities and Local Government (2012) National Planning Policy Framework ([website](#))

¹⁵ Ministry of Housing, Communities and Local Government (2014) Guidance: Health and wellbeing ([website](#))

¹⁶ Public Health England (2018) Public health matters blog: Putting healthier food environments at the heart of planning ([website](#))

¹⁷ Newcastle City Council (2016) Hot Food Takeaway - Supplementary Planning Document ([pdf](#))

¹⁸ RSPH, 2019 <https://www.rsph.org.uk/uploads/assets/uploaded/19c7e03e-c36f-451f-9fd4fa257b771fb6.pdf>

¹⁹ Chartered Institute of Environmental Health (2012) Takeaways Toolkit ([pdf](#))

²⁰ Brighton and Hove City Council (2011) Hot-food takeaways near schools: An impact study on takeaways near secondary schools in Brighton and Hove ([pdf](#))

Delivery services, such as Deliveroo and Uber Eats, undermine the work done by local authorities to reduce the amount of fast food outlets being opened by allowing easy access to unhealthy food²¹. Such services should be required to anonymously share purchasing data with researchers to analyse purchasing behaviour and typical intakes of meals HFSS ordered through delivery companies.

We also believe the planning system should redress the unequal access to healthy foods. Research has found that essential food items can cost up to three times as much in rural and deprived areas²².

Finally we believe local authorities in Scotland should implement bans on HFSS advertising across their transport networks, learning from Transport for London example (i.e. Coca-Cola is still able to advertise extensively across TfL by using recycling as a theme to bypass the restrictions on using brand value adverts).²³

3. What does planning need to do to enable development & investment in our economy to benefit everyone?

We believe the NPF4 needs to acknowledge [1] the need for less fast-food outlets and more investment in affordable healthy food; [2] support for families for easy home cooking; [3] new permissions to have accredited levels of 'green' operations.

4. How can planning improve, protect and strengthen the special character of our places?

We believe the NPF4 needs to acknowledge [1] greater community ownership of vacant and derelict land; [2] increase in gardens and allotments in easy to reach places; [3] flexibility in land use to enable local food production in a sustainable way²⁴; and [4] community spaces for physical activity, growing and cooking supporting connectedness cohesion²⁵.

5. What infrastructure do we need to plan and build to realise our long term aspirations?

We believe the NPF4 needs to acknowledge [1] improved infrastructure to support physical activity and active everyday lives; and [2] an improved public transport system.

Transport should be central to any design and development. It should however not be considered in isolation, it is important to take a wider approach and consider all areas such as housing and community planning. Further emphasis needs to be placed on active travel

²¹ L K Fraser, K L Edwards, J Cade and G P Clarke. (2010) The Geography of Fast Food Outlets: A Review. Int. J. Environ. Res. Public Health 2010, 7, 2290-2308

²² Citizens Advice Bureau Dumfries & Galloway. (2017) Cost of Living in Dumfries & Galloway

²³ London Mayor. (2018) <https://www.london.gov.uk/press-releases/mayoral/ban-on-junk-food-advertising-on-transport-network0>

²⁴ Goulson, D. (2019) Brexit and Grow It Yourself (GIY): A golden opportunity for sustainable farming – Food Research Collaboration.

²⁵ https://www.scotphn.net/wp-content/uploads/2015/09/SHIAN_Community_Venues_and_Health_Guide1.pdf

or multi-modal journeys which has significant benefits for health and tackling inequalities as well as our climate.

Walking and cycling, as a single journey or as part of a multi-modal journey, can provide physical activity and is the most effective way of increasing daily energy expenditure. Regular physical activity can help to maintain healthy weight, support weight maintenance after weight loss, and support weight loss in combination with a change in diet²⁶. Further investment is needed in walking and cycling infrastructure across Scotland in order to make greater progress. This should be coupled with an investment to support communities to increase walking and cycling activities or programmes such as walk to school or walk to work initiatives, including access to any equipment needed. Investment should be targeted to reduce health inequalities.

People living in poverty are more likely to be exposed to risk factors that lead to poor health, and experience more negative health outcomes than people with a higher socioeconomic status²⁷. Some forms of cancer, type 2 diabetes and cardiovascular disease are more prevalent in the most deprived areas²⁸. Obesity levels for both adults and children are higher in the most deprived areas of Scotland than the least deprived areas²⁹. Improving the conditions in which people live and work by increasing the accessibility and affordability of transport can increase access to jobs, education and cultural opportunities, and reduce social isolation and the risk of poor mental health which can all impact on weight³⁰. Tackling inequalities is key to tackling obesity. This includes supporting equal access to the transport system, but also access to an environment that is well-designed, well-connected and well-served reducing the need for car use, supporting multi-modal journeys and promoting activity.

Please visit www.scottishobesityalliance.org.

Follow us on Twitter @SOA_tweets.

Contact us info@scottishobesityalliance.org



²⁶ UK Chief Medical Officers' Physical Activity Guidelines. (2019)

<https://www.gov.uk/government/publications/physical-activity-guidelines-uk-chief-medical-officers-report>

²⁷ NHS Health Scotland. (2016) Health inequalities: what are they and how do we reduce them.' <http://www.healthscotland.scot/media/1086/health-inequalities-what-are-they-how-do-we-reduce-them-mar16.pdf>

²⁸ The Scottish Government. (2018) The Scottish Health Survey. 2017 Edition. Volume 1. Main report.

²⁹ The Scottish Government. (2017) Scottish Health Survey 2016: volume 1: main report.

<http://www.gov.scot/Publications/2017/10/2970>

³⁰ NHS Health Scotland. (2016) Health inequalities: what are they and how do we reduce them.' <http://www.healthscotland.scot/media/1086/health-inequalities-what-are-they-how-do-we-reduce-them-mar16.pdf>

SCOTTISH OBESITY ALLIANCE MEMBERSHIP (April 2020)

ACTION ON SUGAR
ASSOCIATION FOR THE STUDY OF OBESITY SCOTLAND NETWORK
BRITISH DENTAL ASSOCIATION SCOTLAND
BRITISH DIETETIC ASSOCIATION SCOTLAND BOARD
BRITISH MEDICAL ASSOCIATION SCOTLAND
CANCER RESEARCH UK
CHEST HEART STROKE SCOTLAND
CHILDREN IN SCOTLAND
DIABETES SCOTLAND
GLASGOW CENTRE FOR POPULATION HEALTH
HEADS OF PLANNING SCOTLAND (associate)
IMPROVEMENT SERVICE (PLANNING FOR PLACE PROGRAMME)
NHS HEALTH SCOTLAND (associate)
OBESITY ACTION SCOTLAND
PATHS FOR ALL
ROYAL COLLEGE OF ANAESTHETISTS
ROYAL COLLEGE OF PAEDIATRICS & CHILD HEALTH SCOTLAND
ROYAL COLLEGE OF PHYSICIANS EDINBURGH
ROYAL COLLEGE OF PHYSICIANS AND SURGEONS GLASGOW
ROYAL COLLEGE OF PSYCHIATRISTS IN SCOTLAND
ROYAL COLLEGE OF NURSING SCOTLAND
SUSTRANS SCOTLAND
MRC/CSO SOCIAL AND PUBLIC HEALTH SCIENCES UNIT, UNIVERSITY OF GLASGOW
THE BREASTFEEDING NETWORK SCOTLAND
THE BRITISH PSYCHOLOGICAL SOCIETY SCOTTISH BRANCH
VOLUNTARY HEALTH SCOTLAND