

Listening to you: Your health matters

Public Health White Paper – Consultation Responses

We want your views on our proposals in the Public Health White Paper.

Your views are important. We believe the new legislation will make a difference to people's lives. This White Paper is open for public consultation and we welcome your comments. The consultation will close on 24 June 2014.

This form provides all the consultation questions included in the White Paper. To help us record and analyse the responses, please structure your comments around these questions. You do not need to comment on all questions nor do you need to use this form to respond to the consultation. You are welcome to submit your response in a format that suits you.

The proposals are presented under a number of themes; you do not need to answer every question on every theme, only those that you wish to comment upon. The list below may be helpful for ease of navigation:

Chapter 2: Tobacco and electronic cigarettes

- **Tobacco Retailers' Register** Q1 – Q5
- **Electronic Cigarettes** Q6 – Q11
- **Smoke-free Open Spaces** Q12
- **Internet sales of tobacco** Q13 - Q14

Chapter 3: Alcohol

- **Minimum Unit Pricing** Q15 – Q20

Chapter 4: Obesity

- **Nutritional Standards** Q21 – Q23

Chapter 5: Building Community Assets for Health

- **Better planning and delivery of public health services through community pharmacy** Q24 – Q32
- **Toilets for public use** Q33 – Q35

Chapter 6: Regulation for Health

- **National Special Procedures Register** Q36 – Q45

Chapter 7: Next Steps

Q46 - Q47

The Welsh Government will run a series of engagement events across Wales on the White Paper during the consultation period. Details of these events and how to attend will be made available on the consultation webpage when available.

Please submit your comments to PHBill@wales.gsi.gov.uk by 24 June 2014. If you have any queries on this consultation, please email the address above.

Data Protection

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tick the box below. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 allows the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

If you would prefer that your details are not published, please tick here

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Chapter 5: Building community assets for health

Better planning and delivery of public health services through community pharmacy

Question 32

Are there any other specific areas where this approach could be adopted in order to improve public health at a community level?

Yes **X**

No

There is clear evidence pointing to the health and wellbeing benefits of ensuring and improving provision of local, high quality green space as a physical asset of an area (FPH, 2010). This is a tangible asset, which can be tested using the NRW Green space Toolkit for consistent methodology. There are existing processes to independently audit green space quality and fitness for purpose, namely the Green Flag Awards. This would also coincide with the Wales Programme for Government target to use the Green Flag Awards –

'11/023 - remain committed to improving public access to land with better access for families and young children. Support for the Green Flag Awards is intended to drive improvements in the quality of Welsh parks and green spaces.'

The value of green space isn't limited to aesthetic wellbeing. There is also evidence that green space close to people's homes: reduces flooding by providing an unsealed surface into which rainwater can soak away (SuDS Manual, CIRIA 2007), and delivers long-term storage of emitted carbon, which is beneficial in climate change mitigation (Forest Research, 2007)

Technical Advice Note 16 (TAN16): Sport, Recreation and Open Space (2009) states that local planning authorities may wish to use and adapt provisions recommended within the toolkit to address their own needs and circumstances.

A number of local planning authorities (LPAs) have, in the preparation of Local Development Plans (LDPs), used the toolkit to identify, provide for, and improve natural green spaces for their communities. However, in our experience as a statutory consultee in the LDP process, there is considerable variation between LPAs in how the toolkit is used to inform LDP policies. Whilst certain LDPs contain policies which have been clearly informed by an assessment of natural green spaces, a number of LDPs do not contain policies which make provision for natural green spaces.

In recognition of the multiple social (including health), economic and environmental benefits that may be derived from natural green spaces, we recommend that TAN16 should be amended to advise that local planning authorities, when preparing LDPs or Supplementary Planning Guidance (SPGs), should use the toolkit to assess and

where appropriate improve, the provision of natural green spaces within their authority areas.

Consistent with the ecosystem approach, any such amendment to TAN16 should also highlight the multiple health and wider benefits that can be attained from natural green spaces, such as:

- outdoor recreational opportunities to improve health and wellbeing;
- helping manage air quality within urban settings;
- mitigate the impacts of climate change and therefore help reduce the potential for adverse health effects associated with climate change e.g. moderating urban heat islands; and

educational and community/ volunteer work opportunities for communities.

Provision of good quality local green space has also been found to be a hugely effective way to tackle inequality. People living in deprived urban areas have been found to view green space as a key service, alongside housing, health, education and policing. (CABE 2010)

Given that a single area of natural green space can deliver a number of the above benefits, TAN 16 should also emphasise that natural green spaces should be protected and enhanced in the design of new development.

FPH http://www.fph.org.uk/uploads/bs_great_outdoors.pdf

Forest Research <http://www.forestry.gov.uk/fr/URGC-7EVE82>

CABE <http://www.cabe.org.uk/publications/community-green>

Toilets for public use

Question 33

Should a duty be placed on local authorities to develop a strategy for the provision of and access to toilets for public use in their area?

Yes

No

NRW offer support in principle for the provision of adequate toilet facilities based on community and visitor need. Inability to access toilets is an identified barrier to people getting out and about and participating in outdoor recreation. This is particularly the case for people with disabilities, parents of young children and older people (Bichard & Knight, 2011; I'DGO, 2007). However, consideration needs to be taken of the cost, both capital and revenue, of maintaining these facilities. It doesn't stop at the resources required to maintain the toilets themselves, as there are additional impacts on the amount of people using car parks and visitors' attractions. Whilst more visitors are encouraged, the resources to manage this are essential (i.e. increase in parking availability, wardens, cleaners etc.). If a duty is placed on local authorities then it needs to be adequately resourced.

Chapter 7: Next steps

Question 46

We want to ensure that a Public Health Bill is reflective of the needs of citizens in Wales. We would appreciate any views in relation to any of the proposals in this White Paper that may have an impact on a) human rights; b) Welsh language; or c) the protected characteristics as prescribed within the Equality Act 2010. These characteristics include gender; age; religion; race; sexual orientation; transgender; marriage or Civil Partnership; Pregnancy and Maternity; and disability.

When considering the provision of additional toilet facilities, new build facilities should be gender neutral and contain baby changing facilities, as well as being fully accessible. This would deliver local authority and service providers duties under the Equality Act 2010.

Question 47

Do you have any other comments or useful information in relation to any of the proposals in this White Paper?

Yes **X**

No

Please see question 32 for additional comment regarding section 4.14 (page 37) of the White Paper.

Every three years Natural Resources Wales produces the Welsh Outdoor Recreation Survey (WORS), which measures participation in outdoor recreation amongst adults resident in Wales. Findings represent the views of people living in Wales on use of the outdoors, places visited, levels of physical activity, motivations and barriers to visiting the outdoors and 'latent demand' for outdoor recreation. This information can be used to help inform provision of outdoor recreation opportunities to support healthy lifestyle choices, as indicated in section 4.14 (page 37).

Overall, it is key that the role of the environment in underpinning health and good quality of life is valued, and that green space is recognised as a community asset.
