Consultation on draft guideline – deadline for comments <u>5pm on 02/10/17 email:</u> <u>PAPOP@nice.org.uk</u>

Organisation name – Stakeholder or respondent (if you are responding as an individual rather than a registered stakeholder please leave blank):		Natural Resources Wales				
Disclosure Please disclose any past or current, direct or indirect links to, or funding from, the tobacco industry.		None				
Name of commentator person completing form:		Bronia Bendall				
Туре		[office use only]				
Comment number	(full version, short version or the appendices	Page number Or 'general' for comments on the whole	Line number Or 'general' for comments on the whole	Insert each comment in a new row. Do not paste other tables into this table, because your comments could get lost – type directly into this table.		
1	Full	General	document General	Throughout the document there is very little reference to green infrastructure beyond local green space. We must insure for the benefit of both human health and the sustainable management of our natural resources that we design in green infrastructure and do not increasingly add to grey. Green infrastructure goes beyond access to good quality green space. It includes but is not limited to: accessible green space, street trees, hedging, grass verges, sustainable drainage systems (SuDS), planters, green walls/facades, etc. There is strong evidence (e.g. World Health Organization, Urban Green Spaces and Health - Review of Evidence, 2016) which suggests that environments with greater green infrastructure promote health by a variety of mechanisms, including supporting increased physical activity. Street trees not only look aesthetically pleasing but perform multiple services. They act as carbon sinks and air filters and reduce pollution, soak up excess water and reduce the urban heat island effect, and also provide oxygen. Having better air quality is again more likely to encourage people to use the outdoors for active recreation and active travel.		

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				Sustainable drainage systems or (SuDs) can be designed or
				retrofitted within streets and urban green spaces to better cope with predicted extreme weather events and also make the street environment greener and more desirable to attract active travel.
				Extensive green networks or connected 'urban ecosystems' can support active travel, help rebuild biodiversity and provide substantial climate change adaptation such as natural drainage solutions and better airflows. Green spaces are far more effective when linked as they allow people and wildlife to travel through urban areas.
				Consideration should be given to assessing the cumulative 'value for money' for the public purse of interventions that deliver multiple benefits, including increasing physical activity levels. For example, green infrastructure delivers a range of tangible benefits, including increasing physical activity levels, improving air quality, and reducing flooding through mitigating surface water drainage. Cumulative valuation of these benefits will provide a much more accurate assessment of total 'value for money' than more silo-based intervention assessments.
2	Full	4	26 (General comment on whole section)	1.1 Strategies, policies and plans to increase physical activity in the local environment We strongly recommend consideration of including reference to green infrastructure.
				Evidence is growing that people are more likely to continue with physical exercise if it is done in greener environments (e.g. Rogerson, M.; Gladwell, V. F.; Gallagher, D. J.; and Barton, J. L.; Influences of Green Outdoors versus Indoors Environmental Settings on Psychological and Social Outcomes of Controlled Exercise. International Journal of Environmental Research and Public Health. 2016) The city of Copenhagen planned for a network of green cycle routes as part of its aim to become the best city for cycling in the world (download case study from: http://www.centralscotlandgreennetwork.org/campaigns/green-active-travel)
				Recommend inclusion of: Greener, aesthetically pleasing environments promote uptake of physical activity. Environments should be enhanced/retrofitted with, or designed to include the widest appropriate range of green infrastructure (e.g. accessible green space, street trees, hedging, grass verges, sustainable drainage systems (SuDS), planters, green walls/facades, etc.).
3	Full	5	74 (General Comment on whole section)	1.2 Active Travel This whole section makes no reference to the importance of protecting and enhancing green infrastructure when planning for Active Travel.
				We must insure for the benefit of both human health and the sustainable management of our natural resources that we design in green infrastructure and do not increasingly add to grey.
				We must also ensure we are planning for climate change. With the expectation of warmer climates and increased

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				chances of extreme weather events, we must protect those
				who choose to use active travel, e.g. by providing canopy cover for valuable shade.
				We recommend the inclusion of the following under Active Travel (comments 4-8 below):
4	Full	5	75	Line 75 (1.2.1) to include: In order to encourage widespread use, plan new footways, footpaths and cycle routes to pass through green spaces wherever practical.
5	Full	6	92	Line 92 (1.2.3) to include or be an additional point: When planning new footways, footpaths and cycle routes, make sure they include appropriate green infrastructure along the entire route where possible (e.g. street trees, hedging planters, green walls, etc.)
6	Full	6	100	Line 100 (1.2.4) add to bullet point one (line 104) or have an additional bullet: Ensure re-allocated road space is set back from road traffic where possible by e.g. trees, hedging, grass verges to enhance not only safety but also to add a barrier/create some distance from harmful vehicle pollutants and also to create shade.
7	Full	7	113	Line 113 (1.2.5) to include: Ensure appropriate planting e.g. right tree, right location and to consider e.g. Sustainable drainage systems (SuDs) to aid natural run-off.
8	Full	8	149	Line 149 (1.2.8) to add: 'aesthetics' to the sentence: 'Focus on improving safety, accessibility, connectivity, sustainability and aesthetics'.
9	Full	8	158	1.3 Public Open Spaces
				Although travel routes are covered in the previous section it is worth repeating the need for connected communities in this section as users of the guidelines may go directly to this section.
				Green spaces are far more effective when linked (preferably by 'green corridors') as they allow people (and wildlife) to travel through urban areas.
				Recommend inclusion of the following point regarding accessibility: Ensure public open spaces are adequately connected to communities by a network of footways, footpaths and cycle routes to allow people easy access.
10	Full	9	179	Recommend inclusion of the following to the existing sentence:
				'Ensure open spaces and footpaths are maintained to a high standard and where possible publicly accessible green (including "blue") space should be managed to an internationally recognised quality standard such as the Green Flag Award.'
				The Green Flag Award Guidlines clearly specifies the minimum acceptable standards of community engagement, maintenance and accessibility.

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11	Full	9	184	1.4 Buildings In reference to Guidelines from 2008, we accept that you are not taking comments however we feel we must mention the following and urge NICE to consider updating current guidelines:
				Recommend inclusion of: Grounds of buildings are managed to improve their attractiveness to both people and nature so as to promote their use for physical activity, e.g. increased canopy cover for shade when exercising, increased use of sustainable drainage for flood mitigation, increased planting for biodiversity and attractiveness (for guidelines see: https://www.naturalresources.wales/media/681901/managing-the-grounds-of-public-buildings-for-pollinators.pdf)
12	Full	10	197	1.5 Schools In reference to Guidelines from 2008, we accept that you are not taking comments however we feel we must mention the following and urge NICE to consider updating current guidelines:
				We believe this recommendation is weak and needs strengthening as access to natural outdoor space for play and learning is vital to healthy child growth. There is overwhelming evidence that green features on school grounds, not only promotes physical activity, but also benefits pupil learning and behaviour.
				Recommend inclusion of: School grounds should be fitted with the widest possible variety of green infrastructure such as facilities for natural play, facilities for growing food, trees, planters, green walls, and properly designed water features.

Insert extra rows as needed

Checklist for submitting comments

- Use this comment form and submit it as a Word document (not a PDF).
- Complete the disclosure about links with, or funding from, the tobacco industry.
- Include page and line number (not section number) of the text each comment is about.
- Combine all comments from your organisation into 1 response. We cannot accept more than 1 response from each organisation.
- Do not paste other tables into this table type directly into the table.
- Underline and highlight any confidential information or other material that you do not wish to be made public.
- Do not include medical information about yourself or another person from which you or the person could be identified.
- · Spell out any abbreviations you use
- For copyright reasons, comment forms do not include attachments such as research articles, letters or leaflets (for copyright reasons). We return comments forms that have attachments without reading them. The stakeholder may resubmit the form without attachments, but it must be received by the deadline.

You can see any guidance that we have produced on topics related to this guideline by checking NICE Pathways.

Note: We reserve the right to summarise and edit comments received during consultations, or not to publish them at all, if we consider the comments are too long, or publication would be unlawful or otherwise inappropriate.

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