

## Consultation response form: - *Together for Mental Health* Delivery Plan (2016-19)

**Overview**                      **Proposed *Together for Mental Health* Delivery Plan 2016-19**

**How to respond**              Responses should be submitted by 4 April 2016 to:  
[mentalhealthandvulnerablegroups@wales.gsi.gov.uk](mailto:mentalhealthandvulnerablegroups@wales.gsi.gov.uk)

Alternatively you can send the form to:

Mental Health and Vulnerable Groups  
Health and Social Services  
4<sup>th</sup> Floor, North  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

**Further information and related documents**              Large print, Braille and alternative language versions of this document are available on request.

**Contact details**              If you have any queries on this consultation, please email:  
[mentalhealthandvulnerablegroups@wales.gsi.gov.uk](mailto:mentalhealthandvulnerablegroups@wales.gsi.gov.uk)

**Data protection**              How the views and information you give us will be used

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 tell us this in writing when you send your response. 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 and the Environmental Information Regulations 2004 allow 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 If someone has asked for their name and address not to be published, that is an important fact we would take into account.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.

Responses to consultations may be made public – on the internet or in a report.

If you would prefer your response to be kept confidential, please tick here:

## 1. Contact Details

Your name:	<b>Bronia Bendall</b>
Organisation (if applicable):	<b>Natural Resources Wales</b>
Email	<a href="mailto:bronia.bendall@cyfoethnaturiolcymru.gov.uk">bronia.bendall@cyfoethnaturiolcymru.gov.uk</a>
Contact telephone number	<b>0300 065 4341</b>
Your address	<b>Natural Resources Wales Ty Cambria 29 Newport Road Cardiff. CF24 0TP</b>

## 2. Are you responding as an individual or on behalf of an organisation?

Please tick box.

<b>Individual</b>	<b>On behalf of an organisation</b> (please tell us which organisation)
<input type="checkbox"/>	<input checked="" type="checkbox"/> Natural Resources Wales

### 3. Structure of delivery plan

*Together for Mental Health*, the Welsh Government’s 10 year strategy to improve mental health and wellbeing was published in 2012 following significant engagement and consultation with key partner agencies, stakeholders, services users and carers. It is a cross-government strategy and covers all ages, ranging from a whole population approach in improving the mental well-being of all residents in Wales, through to the support needed for those with a severe and enduring mental illness. The strategy consists of five chapters and is underpinned by 18 outcomes. These were subject to detailed formal consultation in 2012 and remain unchanged for the lifetime of this delivery plan. These outcomes have been mapped to the Goals contained within the Wellbeing of Future Generation (Wales) Act 2015.

Following feedback from stakeholders we have laid out the priority areas, by subject, detailing links back to the relevant chapter areas where required for ease of reading

#### Question 1

<b>Do you feel that there are any priority areas missing from the delivery plan? Please tick appropriate box</b>		
Yes	No	Partly ✓
Where you have ticked ‘Yes’ or ‘Partly’ please explain what you think these are.		
<p>Overall, we feel that the overarching priority areas cover the broad nature of mental health.</p> <p>However, we believe that good quality outdoor environments such as green spaces, tree canopy cover, can play a vital part in maintaining and enhancing good mental health as well as playing a vital role in the treatment and management of conditions. Participation in physical activity (including the informal, e.g. active travel, and more formal initiatives, e.g. Actif Woods), access to food growing, ecotherapy, etc. all have a vital role to play in contributing to good mental health and we would wish to see a greater recognition of this within the delivery plan. We have covered these points in more detail in Question 2.</p> <p>A Faculty of Public Health publication in association with Natural England: <a href="#">‘Great Outdoors: How Our Natural Health Service Uses Green Space To Improve Wellbeing’</a> gives a recent summary of the effects of natural environments on wellbeing and demonstrates the vital role it can play in delivering your primary goal of “Promoting better mental wellbeing and preventing mental health problems”. The paper states: ‘A wide range of evidence suggests that contact with safe, green spaces can improve a number of aspects of mental and physical health and wellbeing as well as various social and environmental indicators. For example:</p> <ul style="list-style-type: none"> <li>• Contact with green spaces and natural environments can reduce symptoms of poor mental health and stress, and can improve mental wellbeing across all age groups.</li> <li>• Access to green spaces can increase levels of physical activity for all ages.</li> <li>• Having green spaces in an area can contribute to reduced health inequalities.</li> <li>• Safe, green spaces can increase levels of communal activity across different social groups as well as increase residents’ satisfaction with their local area.</li> <li>• Green spaces can help with our response to climate change through their potential to reduce the impacts of heatwaves and reduce flooding and reducing CO2 emissions.</li> <li>• Green spaces and natural environments can improve air and noise quality and support sustainability through increasing biodiversity, encouraging active transport and community participation.’</li> </ul> <p>Accepting that work has been done to map out the delivery plan against the Wellbeing of Future Generations Act Goals the delivery plan does not seem to address the second goal: “A resilient Wales”, and is therefore a little unbalanced in its delivery of sustainable development.</p>		

## Question 2

Within each priority area we have identified a number of goals and key actions. Do you feel these are the right ones? Please tick appropriate box		
Yes	No	Partly ✓
Where you have ticked 'No' or 'Partly' please provide an explanation and any alternative suggested wording. In your answer please state which priority area/goal or key action you are commenting upon.		
<p>At first sight it seems that much of the content in this delivery plan is out of scope for Natural Resources Wales, however we are aware that we have a broad role to play in delivering against this agenda. Many of the goals identify the delivery of subsequent plans, e.g. 'Together for a Healthy Working Wales', 'Ageing Well in Wales' the NHS led 'Together for Children and Young People Programme' (T4CYP), etc. of which we contribute to. We also have partnership/stakeholder roles to play in delivering initiatives e.g. Flying Start, Families First, workplace health, etc.</p> <p>The natural environment can serve in two ways to affect mental health: as a determinant, and as a resource for therapeutic interventions. The proposed delivery plan fails to mention either use, but there are several areas where the natural environment could be helpfully mentioned.</p> <p>The evidence is particularly strong for positive associations between experience of natural environments and mental health. It appears that contact with natural environments promotes psychological restoration (Kaplan &amp; Kaplan, 1989), improved mood (Barton and Pretty, 2010, Hartig et al., 2003 and Roe and Aspinall, 2011), improved attention (Hartig et al., 2003 and Ottosson and Grahn, 2005) and reduced stress and anxiety (Grahn and Stigsdotter, 2003, Hartig et al., 2003, Maas et al., 2009a and Ulrich et al., 1991). Within deprived communities, research has also consistently shown the benefit of green space both to cognitive restoration (Faber Taylor et al., 2002 and Kuo, 2001), self-discipline (Faber Taylor et al., 2002), reduced aggression (Kuo &amp; Sullivan, 2001a) and reduced crime (Kuo &amp; Sullivan, 2001b).</p> <p><b>Priority Area 2: All children and young people are more resilient and better able to tackle poor mental well-being when it occurs.</b></p> <p>If children are to be helped to remain mentally well and resilient to stress then it follows that access to green spaces is a contributing factor. There is growing evidence that children do better at school if they are provided with access to green space, for example: '<a href="#">Green spaces linked to improved cognitive development in schoolchildren</a>' (Science for Environment Policy, European Commission).</p> <p>Therefore we propose:</p> <ul style="list-style-type: none"> <li>• The inclusion of outdoor educational opportunities for all children and young people (in education) whether that be through the curriculum in an outdoor setting (over and beyond Physical Education), or structured and informal outdoor play opportunities for young children. This has benefits for both mental wellbeing and physical health.</li> <li>• A call for the Welsh Government (education) to ensure all schools, starting with primary schools, develop their grounds as green spaces.</li> </ul> <p>The above are cross-cutting actions over many agendas. They are obviously not just the responsibility of this plan to deliver but we believe they must be considered in a mental health context as a vital contribution to children and young people's wellbeing.</p> <p><b>Priority Area 3 – Children and young people experiencing mental health problems get better sooner.</b></p> <p>In addition to the points mentioned under Priority Area 2, we would like consideration to be paid to the potential for the use of green spaces in the treatment and rehabilitation of young people with mental health problems. As noted in the papers cited above, green environments are likely to provide good places to recover from mental illness, e.g. some of the latest interventions are made using the theory of ecotherapy: the engagement in meaningful activities which enable people to actively help damaged environments get better, in turn boosting mood and self-esteem.</p>		

We would wish the delivery plan to consider the addition of a specific action related to service providers enabling children with mental health problems to participate in ecotherapeutic and thereapeutic initiatives in the outdoor environment through a variety of mediums, from arts and creativity, to physical activity and educational programmes.

***Priority Area 4 – People at working age are more resilient and better able to tackle poor mental well-being when it occurs.***

We would encourage the inclusion of actions to support the use of accessible, welcoming greenspace close to where people live and work to improve resilience and tackle poor mental health (for all sectors of society). We would like to see the delivery plan support the provision of accessible natural green space as advocated in NRW's Accessible Natural Greenspace Toolkit (currently in the process of being updated). The Toolkit aids users in the provision of accessible natural green space in order to promote human mental wellbeing by mapping existing greenspaces, identifying deficits and recommending standards for provision – as a minimum, no-one should live more than 300m from their nearest area of natural greenspace – that is 6 minutes' walk with a push-chair.

As previously mentioned, natural environments can aid recovery/treatment of some mental health conditions, therefore we would like consideration to be made to including natural environments in 'community settings' (Action 4.1(i)).

Action 4.1 (ii). We would welcome Welsh Government guidance to include the benefits of natural environments for treating/improving mental health conditions, as well as the role of natural environments for preventing other disorders (stress, anxiety) in the first place.

Action 4.3(i). There is evidence that greener work environments help protect workers from stress and we would recommend the greening of places of employment (see: Saraev, V. (2012) Economic benefits of greenspace: a critical assessment of evidence of net economic benefits. Forestry Commission Research Report. Forestry Commission, Edinburgh. i–vi + 1–38 pp.)

***Priority Area 7: People with a mental health problem have access to appropriate and timely services***

We would suggest an increased use of the referral system (be it through the National Exercise Referral Scheme (NERS) or through third sector organisations such as MIND in a more informal 'referral) to encourage use of the outdoors as an appropriate service for helping to improve mental wellbeing.

***Priority Area 8: People of all ages experience sustained improvement to their mental health and well-being through access to positive life chances***

This section references housing, employment, support of financial matters and recovery oriented mental health services. It lacks reference to access to healthy outdoor spaces, the benefits of physical activity or indeed the '5 ways to wellbeing'.

The section feels a little incomplete and we feel the inclusion of the '5 ways to wellbeing' in this section would strengthen it and would provide a more rounded approach to wellbeing as it includes, Connect (with people), Be Active, Take Notice (of the world around you), Keep Learning (trying something new) and Give (doing something for a friend or stranger).

As stated under Priority Area 2 (above) there is a lot of evidence that access to appropriate green space close to home can positively affect people's mental wellbeing. Health inequalities in particular seem to be reduced in the presence of green space (for a summary of the evidence see: [Local action on health inequalities: Improving access to green spaces](#). Health Equity Evidence Review 8: September 2014 by Reuben Balfour and Jessica Allen, published by Public Health England). Providing good quality green spaces should therefore help people who have become ill to recover in conjunction with other treatment.

We propose that Welsh Government (planning) strengthen the implementation of Planning Policy Wales and particularly TAN 16 where these call for the provision of high quality green space of adequate size and the right location to ensure everyone has access within walking distance of home (this action relates to many of the Priority Areas in this delivery plan and as stated under Priority Area 2 is cross cutting across agendas)

**Priority Area 9: Wales is a 'Dementia Friendly Nation'**

Once more we would suggest the use of greenspace to help Wales become a Dementia friendly nation. Amending Planning Guidance to ensure the consideration and provision of dementia friendly communities/towns/streets etc., and the planned provision and use of greenspace within these areas would be a step change in the way Wales delivers dementia care.

**Priority Area 11: The implementation of the strategy continues to be supported**

Whilst there is a growing body of evidence on the value of the presence of green space the health profession still does not use or advocate these as a matter of course and it has been suggested that this is mainly due to the lack of randomised controlled trials in this subject area. We would therefore request a partnership approach to developing specific research to confirm 1) the health-promoting benefits of local, high quality, accessible green space and 2) the benefits of using the natural environment in the recovery and treatment of mental health conditions across a range of settings, e.g. physical activity initiatives, ecotherapy, outdoor arts and creativity initiatives and would welcome further discussions with you and other key partners as to its scope and how best to progress this research.

**Question 3**

**Do you think we have the correct balance between improving the mental health and resilience of the whole population and the care and treatment for those individuals with mental health problems?**

Yes	No ✓	Partly
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Where you have ticked 'No' or 'Partly' please say what are the gaps / actions you would propose were added.

Overall, we feel that the overarching priority areas cover the broad nature of mental health, however we feel that the plan focusses heavily on treatment/management and access to services over prevention. We recognise that treatment and management of conditions is vital, however we must have a concerted effort to help people live full, meaningful lives with good mental health, help people to manage their conditions and where possible prevent conditions occurring.

We believe that NRW has a significant contribution to make to this agenda, both in terms of the environments where people live, work and play but also in the treatment and ongoing management of conditions. We would welcome further discussions to see how we can work in partnership on this agenda to enhance the lives of the people of Wales.

**Question 4**

**The introduction to the delivery plan provides information on the prudent health and care agenda. Do you think we should include any other actions in the delivery plan around the prudent agenda and how this is rolled out across Wales in terms of best practice?**

Yes	No
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Where you have ticked 'Yes' please explain what else you feel could be done?

No comment

### Question 5

<b>Do you think the actions will provide a positive impact of the proposals for people with the following protected characteristics:-</b>		
<ul style="list-style-type: none"><li>• Disability</li><li>• Race</li><li>• Gender and gender reassignment</li><li>• Age</li><li>• Religion and belief and non-belief</li><li>• Sexual orientation</li><li>• Human Rights</li><li>• Children and young people</li></ul>		
Yes ✓	No	Partly
Where you have ticked 'No' or 'Partly' please explain why.		
No additional Comments		

### Question 6

<b>Do you think the actions will provide a positive impact on the opportunities for use of the Welsh language?</b>		
Yes ✓	No	Partly
Where you have ticked 'No' or 'Partly' please explain how you feel we could strengthen opportunities for using Welsh to ensure it is treated no less favourably than the English language?		
No additional Comments		

### 7. Additional Comments

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use the space below to comment.

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