1. Natural Resources Wales (NRW) welcomes the opportunity to contribute to this consultation on the Draft Global Action Plan for Physical Activity. The publication of this new plan represents a further crucial development and an additional opportunity for all nations to shape the promotion of physical activity.

2. NRW's purpose is to pursue the sustainable management of natural resources in all its work to improve Wales' well-being, and provide a better future for everyone. Wales' natural resources provide our basic needs; the air we breathe, the water we drink, and the food we eat. They give us energy, prosperity and security; they protect us and make us healthier and our lives better. In exercising our functions and duties regard is taken to the health and social well-being of individuals and communities in order to help people live healthier and more fulfilled lives. As one such function, we advocate outdoor physical activity opportunities and the appropriate environmental infrastructure to enable physical activity for children and adults.

3. We strongly support this Draft Action Plan. Within our response we have not commented on the aspects that we would support, but have highlighted gaps or improvements that we feel appropriate. Our response follows the sections of the document.

Overview of the Global Situation

4. We believe that the 3 ‘sectors’ of ‘work, active travel, and leisure’ should be referred to as ‘domains’ for consistency and also that consideration be given to the inclusion of a possible 4th domain ‘domestic’ physical activity (PA)?

5. There is a need to be clearer on the difference between ‘sport’ and ‘informal recreation’ as these are not the same. In terms of PA, this is an important distinction, as competitive sport can be considered by some as a barrier, in comparison to the motivation of ‘fun’ associated with informal recreation.

6. Increasing physical activity should distinguish between the ‘intensity’, frequency’, and ‘duration’. Research undertaken by NRW found that the population could be divided into 7 PA groups, based on different levels of intensity, frequency and duration. Monitoring, communications, and interventions aimed at increasing PA should be aware of, and responsive to, these differences. [https://naturalresources.wales/media/681025/welsh-outdoor-recreation-survey-key-facts-for-policy-and-practice-2016.pdf](https://naturalresources.wales/media/681025/welsh-outdoor-recreation-survey-key-facts-for-policy-and-practice-2016.pdf)

Goal

7. We believe the Goal is too ‘large-scale’ and remote from both Member States and domains. A more appropriate goal would be based on a percentage change in PA, which can then be sensitive to the different levels of Member States and the contribution of relevant domains.

8. The Goal should have a clear Indicator in order to ensure that progress can be monitored by Member State and Domain.
The Eight Cross Cutting Guiding Principles

9. **Principle (a):** We support the importance of using a life-course approach, but this should be more relevant to aspects that affect PA levels, such as ‘parenthood’, ‘employment’, ‘early retirement’, etc.

10. **Principle (b):** We believe that consideration should be paid to the interaction between characteristics, e.g. the combination of age and disability, rather than take such variables in isolation.

11. **Principle (c):** We believe the focus should be on programmes that have a proven ability to lead to self-sustaining long-term physical activity behaviour change, rather than an assumption of continuous interventions.

12. **Principle (e):** The evidence gaps should include (i) comparable PA by domain; (ii) total valuation of multiple benefits from intervention, including those relating to PA but also wider benefits such as improvements to air quality, in keeping with the SD Goals.

**Strategic Objective 1: Creating an Active Society**

13. We strongly support the actions proposed under Strategic Objective 1, with the following comments:

14. **Indicators:** We recommend the following additional Indicators:
   - X% of the population who express positive attitudes and values towards Physical Activity
   - X% of the population who know about, and value, the benefits of Physical Activity for health, along with the contribution to other SD Goals such as air quality etc.
   - X% of the population who meet the required level of PA by each DOMAIN (using comparable metrics)

15. **Proposed Action 1.2:** This action calls for member states to offer free activities in local parks. Unfortunately, people in disadvantaged areas are less likely to have access to well-managed parks. This action would be enhanced by a call to provide well-managed parks and urban green spaces, especially in disadvantaged urban areas, which are free for all to use. This could be measured by the proportion of parks reaching minimum standards of management, such as the Green Flag Award ([http://www.greenflagaward.org.uk/](http://www.greenflagaward.org.uk/)). This proposed amendment is supported by Urban Green Spaces: a brief for action. Copenhagen: WHO Regional Office for Europe. 2017. Adopting this indicator would also stimulate the delivery of Proposed Actions 3.4 and 3.5.

**Strategic Objective 2: Creating Active Environments**

16. We strongly support the actions proposed for member states under Strategic Objective 2, with the following comments:

17. This global action plan reflects the increasing urbanisation of world populations. Whilst, it is recognised that our populations are increasingly choosing to live in urban areas, we feel it is important to highlight the many surroundings that are available to participate in physical activity – from doorstep to mountains and all things in between. Settings such as schools, workplaces, health care settings, and local communities are referenced but there is little reference to surroundings beyond local green space and active travel routes.
18. Much reference is also made to cities and communities, and access to physical activity as close to home and work as possible, which is of course vital to embed activity into everyday life, however, many opportunities for physical activity lie outside of these settings. Landscapes outside of urban settlements such as mountains, coasts, forests and lakes can offer vital opportunities to enjoy activities but also offer adventure, access to cultural sites (such as castles and hillforts), and provide mental health benefits. Raising awareness amongst the public and professionals alike as to the health benefits of our broader landscapes, which are freely available to all, could lead to significant improvements in activity rates. It vital that our broader surroundings are recognised as part of the action plan as there are multiple opportunities for activity, however there are also challenges.

19. We note from the introduction to this action plan that physical activity levels in urban areas appear to decline when people face physical and psychological barriers to open space (e.g. hot weather, danger from road traffic, perceived threat of danger or anti-social behaviour in open spaces, time-consuming routes to suitable open space etc.). We note that member states may have to “over invest” in actions to overcome those barriers before people will be encouraged to change their existing behaviour patterns and give priority to exercise.


21. Indicator 1: We recommend changing the wording from ‘cities and communities’ to ‘proximate to where people live, work, and play’ in order to encompass all potential environments that can support and facilitate PA.

22. Indicator 2: We do not believe this is clearly associated with levels of PA

23. Additional Indicator:
   - Provision of accessible green infrastructure, both open spaces and linear routes, that facilitate physical activity whilst also delivering wider health and social benefits

24. Proposed Action 2.1: We recommend the addition of the following: Creating attractive local environments for active travel needs to be combined with encouraging more locally-based ways of living of the sort that lend well to walking and cycling. Planning services and facilities more locally could reduce dependency on motorised transport (whether private or public) for daily living, making active travel a more realistic choice.

25. Proposed Action 2.3: We welcome this action and its emphasis on “quality public open and green space”. We re-iterate the importance of using a recognised quality standard to assess that public open and green space is being managed well enough to attract people to use it (e.g. The Green Flag Award http://www.greenflagaward.org.uk/).

26. Proposed Action 2.3: Specific mention should be made of planning and implementing a comprehensive network of user-friendly active travel routes in, around and linking settlements and their neighbourhoods, and introducing a hierarchy of routes (for the same reasons as we have become used to on motor roads).
27. **Proposed Action 2.3:** As a principal component or urban green infrastructure, urban trees are worth mentioning too. This can also translate into a measurable indicator: the percentage of urban tree canopy cover. A suitable minimum standard could be set at 20%. (Ref: Natural Resources Wales. 2016. Tree cover in Wales’s towns and cities. [Online] http://naturalresources.wales/guidance-and-advice/environmental-topics/your-neighbourhood/green-spaces/urban-trees/?lang=en [Accessed on 23 August 2017]

28. We feel the Actions in this Objective would be strengthened by adding a further action as follows:

“Set standards for providing accessible natural green spaces, and enable and support all levels of Government to assess, protect, enhance the availability of accessible natural green spaces. This should include making provision for increasing the availability of accessible natural green spaces where current provision is found to be deficient.”

This action would support the achievement of the indicator on green space provision (which we suggest as a modification to indicator 1. above). One of Natural Resources Wales’ legacy body’s (Countryside Council for Wales) produced a toolkit to assist in the assessment and planning of accessible green space in urban areas which may help with the delivery of our proposed new action, and the actions proposed in paragraphs 98 and 99 of the discussion paper. We will provide this toolkit on request (The Greenspace Toolkit A Practical Guide to Assessing the Resource and Implementing Local Standards for Accessible Natural Greenspace Provision in Welsh towns and cities. Countryside Council for Wales, 2011, Bangor).

29. We welcome the action proposed in paragraph 106 and recommend the refurbishment of Parc Peulwys in Conwy as an outstanding example of community engagement to promote the healthy use of green space around social housing (https://naturalresources.wales/media/674659/parc-peulwys.ppt).

**Strategic Objective 3: Creating Active Lives**

30. We strongly support the actions proposed for member states under Strategic Objective 3, with the following comments:

31. **Additional Indicators:**

- % of countries with ‘Active Recreation’ programmes for both children and adults
- Regular contact with nature appears to be very important for children’s physical and mental development and we recommend the inclusion of an indicator to ensure this occurs. The Welsh Government requires all schools to use the outdoors as an aid to learning and child development (http://gov.wales/docs/dcells/publications/150803-fp-framework-en.pdf). Wales has proved that outdoor learning is possible even in dense urban environments, therefore we recommend the inclusion of an indicator to show the percentage of schools where outdoor learning is delivered.

32. **Proposed Action 3.1:**

a. Physical activity must be incorporated into children’s lives in educational settings above and beyond PE and sport opportunities. The school curriculum is currently not sufficiently addressing the opportunities for learning in the outdoors and the knock on
effects on increasing physical activity (Lovell et al 2009  
https://www.era.lib.ed.ac.uk/handle/1842/4146)

b. There is real opportunity to make learning and play outside the classroom mandatory across the age ranges. This form of learning can contribute significantly to increasing physical activity. Outdoor Learning removes barriers with children being active without realising it. Forest Research (2006) found that on a day spent learning in a woodland environment, ‘children were found to be significantly more active than on other typical school days’. Levels of activity were ‘2.2 times greater than those on the active school days and 2.7 greater than on an inactive school days’. Active school days were those with a timetabled PE lesson. Children also regularly exceeded the daily recommended one hour of moderate to vigorous physical activity (MVPA) averaging 89.4 minutes. On typical school days, the children on average did not meet the recommendation – active days 29.1 minutes and inactive school days 20.5 minutes.

c. The 2006 NEF report stated that an evaluation of Forest Schools found that children developed physical stamina and their gross motor skills improved through free and easy movement around the site. They developed fine motor skills by making objects and structures. ‘The role of Forest School in children’s physical development has health implications and should not be overlooked’.

d. We must ensure teachers and education support staff have the training and skills to implement high quality outdoor learning (NB: Forest School is one specific delivery mechanism – there are many others). Accredited modules are available through Agored Cymru and best practice is demonstrated by Cardiff Met and the University of South Wales who deliver OL qualifications within their teaching and Early Years degree courses.

e. Outdoor learning also creates a valuable link to the sustainable management of natural resources. The earlier in life people experience our natural resources, the more likely they are to continue to use and value them as they progress in to adulthood.

f. There is also an opportunity to set a minimum requirement for school grounds improvements in order to benefit pupil learning, health and skills development and wider biodiversity/ ecosystem management. If not available on site, every education setting should have a formal link to another natural area. There are many other benefits associated with this, e.g. a report, published by Natural England and the Royal Society for the Protection of Birds, also found that children’s behaviour and school work improved if their playground had grassy areas, ponds and trees.

33. Proposed Action 3.2: Because there are no standard protocols for prescribing and delivering physical activity, and especially physical activity in natural environments, we have not seen it used widely in the UK. Healthcare professionals seem to feel that physical activity prescriptions are risky and are unsupported by hard evidence. If the WHO were to develop recommended standards for prescribing and delivering physical activity, especially in natural environments, it would raise its status as a treatment, and encourage its use by healthcare professionals at all levels. The natural health service (http://naturalhealthservice.org.uk/wordpress/) is a good example of how physical activity in the natural environment has been developed with, and accepted by health care professions.
Strategic Objective 4: Creating Active Systems

34. We strongly support the actions proposed for member states under Strategic Objective 4, with the following comments:

35. **Additional Indicators:**
   - % of countries with an annual public reporting of population physical activity by domain (work, leisure, and travel) using comparative metrics.
   - Because well managed accessible green space in urban environments is vital as a venue for healthy activity we recommend the inclusion of an indicator to show the percentage of countries using a recognised standard to measure the quality of management of their parks and green spaces (e.g. The Green Flag Awards [http://www.greenflagaward.org.uk/](http://www.greenflagaward.org.uk/))

36. **Proposed Action 4.2 (152):** Add – clear identification of evidence gaps by Member States, including evidence on cost-effective interventions that have a proven ability to lead to self-sustaining physical activity behaviour change.

37. **Proposed Action 4.2:** We recommend the addition of the following (after 153): Creating technological and logistical systems that reduce the need to motorised travel (whether public or private) and encourage active travel needs to be developed. Another way to look at this is to reduce the need for longer journeys and open more reasons for short walking and cycling local journeys. Planning work, amenities, leisure facilities, etc. to be more local could encourage this and make active travel a more realistic choice for daily living.

38. **Proposed Action 4.4:** Consideration should be given to assessing the cumulative ‘value for money’ for the public purse of interventions that deliver multiple benefits, including increasing children’s physical activity levels. For example, a new green outdoor play space in an urban area could deliver a range of tangible benefits, including increasing children’s 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. This approach would also support the aims and goals of the Well-being of Future Generations Act (Wales), 2015.

**Glossary**

39. Define ‘Active Travel’. Suggested definition: walking and cycling for purposeful journeys (as opposed to recreation) as the preferred ways of getting around over shorter distances. (Based on Welsh Government. 2013. Active Travel (Wales) Act 2013. An Active Travel Action Plan for Wales. Introduction and vision.

40. ‘Active Recreation’ – this does not align with the definition in the UK, whereby ‘active recreation’ is considered to be defined as ‘a diversity of informal non-motorised recreational pursuits which require a level of physical activity, ranging from walking to horse-riding to canoeing. These generally have limited environmental impact.