

National Institute for Health and Clinical Excellence

**PH PROGRAMME – PHYSICAL ACTIVITY AND THE ENVIRONMENT
Consultation 6th March – 5th April 2006
Comments on the Scope by 5th April 2006**

Stakeholder Comments

Please use this form for submitting your comments to the Institute.

1. Please put each new comment in a new row.
2. Please insert the **section number** in the 1st column. If your comment relates to the document as a whole, please put '**general**' in this column

Name:	Philip Insall
Organisation:	Sustrans
<p align="center">Section number</p> <p>Indicate section number or 'general' if your comment relates to the whole document</p>	<p align="center">Comments</p> <p align="center">Please insert each new comment in a new row.</p>
General	Sustrans most warmly welcomes the decision to prepare this guidance. We believe that the environment is the most significant determinant of many aspects of physical activity, and that many individual-focused and motivational interventions to promote physical activity are doomed to failure unless the environment is also addressed.
4.1.1	We believe that your intention to look at interventions across the full social gradient is the right one. It may be possible to “zoom in” to some extent on the impacts of certain interventions on people most at need, but many environmental interventions have a whole-population impact.
4.2.1	<p>We are pleased to see the reference to cost effectiveness. It should though be kept in mind that many environmental interventions have objectives across a number of sectors, and so their cost-effectiveness, or benefit : cost ratios, should be presented in that light. In the field of active travel, it may be that an intervention pays for itself through benefits in emissions reduction or congestion-busting, and the physical activity outcomes are effectively free. We need to guard against a misleading cost-effectiveness comparison with individual-focused interventions, which may have no other such outcomes.</p> <p>We particularly welcome the recognition of “interventions that incorporate physical activity into daily life”.</p> <p>We are glad that you have made specific reference to active travel</p>

Appendix F

4.2.1 (a)	We hope that this area will include land-use planning, as well as the buildings and spaces themselves within it
4.2.1 (b)	We support this (and agree with the logic behind your division of (a) and (b))
4.2.1 (c)	Please note that most public transport trips contain an active component. Research done last year by Sustrans for the DfT Sustainable Travel Towns programme shows that the average public transport journey contains 10 minutes of active travel, compared with 4 minutes for the average car trip
4.2.1 (d)	<p>While accepting that the guidance should look at the cultural as well as the physical environment, we are not comfortable with the wording here, which appears to suggest that individual-focused motivational campaigns might also qualify. This guidance is groundbreaking in focusing on the environmental factors and interventions; that focus must not be lost.</p> <p>It would be valuable to include examples where NHS professionals contribute to environmental interventions, and these do exist, but campaign-type interventions should not be included.</p>
4.2.1 (e)	<p>This could be better phrased << National, regional and local policies – from the UK and elsewhere - etc>> A key point about many environmental interventions promoting physical activity – and also about the many environmental factors which serve to depress it – is precisely that they are not created by “physical activity” policies and programmes. The people drafting them may never have considered the impact, positive or negative, that their work could have on physical activity levels.</p> <p>It is also worth bearing in mind – you are doubtless aware of this – that examples from outside the UK will need special presentation to overcome the predictable criticism that “it won’t work here”.</p>
4.2.1 final para	We welcome your awareness of these types of intermediate outcomes, and wonder if it might also be possible to refer in the guidance to parallel outcomes (improved road safety arising from increased levels of walking and cycling is not only an intermediate outcome and a positive feedback factor, but in itself a positive outcome).

4.4	<p>This list of questions is broadly appropriate. We have three comments:</p> <p>1) We suggest you might add questions to elicit who is/are the body/ies carrying out the intervention, which sector they inhabit, and (this is implicit in your first question but should perhaps be explicit) whether their objectives were health related at all. Some major interventions may have been undertaken without planning for a health dividend.</p> <p>We can provide examples of transport interventions where no explicit health objectives were identified during the planning (in most cases the health outcomes are quickly recognised post-hoc, and may be reported, but they were not considered when the intervention was planned).</p> <p>2) In our view (and in our experience) a major strength of the environmental approach is that the outcomes are sustained – and often continue to grow – over a very long timescale. Traffic-free walking and cycling routes we have built see usage levels increasing year on year, even a decade after construction, and the National Cycle Network has seen five years of successive like-for-like growth. You might consider whether the terms you have defined here are long enough.</p> <p>3) And although this guidance will not seek to offer comparison between environmental and individual interventions, we believe it will illustrate precisely that certain environmental interventions are good long-term (I mean, really long-term, eg ten or twenty years) investments.</p>
4.5	<p>Pleased as we are to see the Highways Agency listed as a target audience, we suggest that others should perhaps rank higher. The HA has responsibility only for trunk roads and motorways, and while it can (and often does) undertake important works to ensure that walking and cycling routes are not severed by these roads, it is less influential than the highway authorities in this sphere.</p> <p>Note also that land use and development control have as great an influence as transport developments, in creating environments that are conducive (or hostile) to active travel. They may also have a major role in other types of physical activity – recreational, gardening etc – although Sustrans is not competent to comment on these.</p> <p>We wonder therefore whether it might be better to list the local authority sectors likely to have a major role – transport and highways, land use and planning, parks and leisure, environment, education, regeneration.....</p> <p>We suggest also that you might add Police forces to the list of targets – anti-social behaviour has an impact on the activity-friendliness of environments</p>

Appendix F

General	<p>This guidance is virtually guaranteed to point the need for new research and evidence. There is often a tendency for the type of evidence that can be collected on environmental interventions to be undervalued by comparison with that available in other sectors. The scope might usefully identify that the guidance will look at this issue and make recommendations as to the types of intervention that need to be studied, and perhaps the type of research and analysis needed.</p>
---------	---