

Response ID ANON-RDKT-Y4R3-7

Submitted to **A consultation on a new National Public Health body: 'Public Health Scotland'**

Submitted on **2019-07-08 17:01:23**

Questions

1 Do you have any general comments on this overview of the new arrangements for public health?

Give your comments below::

RTPI Scotland welcomes the establishment of Public Health Scotland (PHS). Scotland faces major challenges in terms of public health. The quality of the places where we live, work and play have a major impact upon people's behaviour. Quality placemaking is evidenced to promote healthy behaviours, environmental health, mental and physical wellbeing, and achieve greater equity in health. Planning is fundamental to delivering healthier places in the long-term, RTPI Scotland therefore understands the importance of this opportunity to reconnect public health and planning. Through upstream preventative interventions associated with quality placemaking, town planning should be seen as a crucial preventative investment to drive transformative change and secure a healthier built environment. Therefore in setting up PHS its remit needs to make a clear, considered and strong connection with the planning system. RTPI Scotland considers that, in its current form, the consultation document has failed to make this connection explicit enough.

2a What are your views on the general governance and accountability arrangements?

Give your comments below::

RTPI Scotland is broadly supportive of the general governance and accountability however, recent changes to primary legislation in the planning system, with the passing of the Planning (Bill) Scotland need to be reflected in the document. In paragraph (36) the plans and strategies should now be updated to include reference to Local Place Plans, provisions for which have now been included in the Planning (Scotland) Bill as passed. At a strategic level RTPI Scotland welcomes the intention to work with Regional Economic Partnerships but would like to see a clear remit to align with the range of regional strategies and plans including Regional Spatial Strategies, provisions for which have been included in the Planning (Scotland) Bill, City-region deals, the Infrastructure Investment Plan and Regional Transport Partnerships.

2b How can the vision for shared leadership and accountability between national and local government best be realised?

Give your comments below::

A significant opportunity to share leadership and accountability between national and local government is provided with new regional arrangements in Scotland mentioned in the previous answer. Furthermore, provisions for a statutory Chief Planning Officer in the Planning (Scotland) Bill as passed, present an important opportunity for PHS to support this role and contribute towards corporate decision making in local authorities, especially in terms of long-term preventative interventions. The influence of planning departments throughout local authorities is important as most corporate decisions have long-term land use implications. This goes beyond the creation of healthy places to include looking at spatially appropriate sites for care homes, community hubs, leisure centres and medical centres. Planning can perform the critical function of aligning transport initiatives, housing strategies and economic development – all of which have major impact on health outcomes. RTPI Scotland therefore strongly encourages PHS to work with Scottish Government in the formation of guidance for the Chief Planning Officer role.

3a What are your views on the arrangements for local strategic planning and delivery of services for the public's health?

Give your comments below::

RTPI are broadly supportive of the proposed arrangements. We welcome the recognition that PHS will be one part of a whole system approach and that community planning provides a natural local place for partners to come together.

3b How can Public Health Scotland supplement or enhance these arrangements?

Give your comments below::

In regards to service delivery RTPI Scotland would welcome a specific commitment to the place principle. The place principle requests that - "All those responsible for providing services and looking after assets in a place need to work and plan together, and with local communities, to improve the lives of people, support inclusive growth and create more successful places." If the principle is adhered to, a more joined-up, collaborative, and participative approach to services, land and buildings, across all sectors within a place, would link directly with Public Health Scotland's remit to support a whole systems approach to reform.

4 What are your views on the role Public Health Scotland could have to better support communities to participate in decisions that affect their health and wellbeing?

Give your comments below::

With the introduction of Local Place Plans in the Planning (Scotland) Bill as passed, PHS have an opportunity to engage with communities alongside and beyond Community Planning Partnerships. RTPI Scotland would also like to highlight the Place Standard Tool which has been jointly designed by NHS Health Scotland, the Scottish Government and Architecture & Design Scotland. This tool allows users to assess places based on 14 questions which are answered on a 1 to 7 scoring system. This tool enables discussions around a place to be structured and can outline the strengths and weaknesses of a place. This tool is now also available online and as an app which allows communities and individuals to assess a place anywhere at any time.

5a Do you agree that Public Health Scotland should become a community planning partner under Part 2 of the Community Empowerment (Scotland) Act 2015?

Yes

5b Do you agree that Public Health Scotland should become a public service authority under Part 3 of the Community Empowerment (Scotland) Act 2015, who can receive participation requests from community participation bodies?

Yes

5c Do you have any further comments?

Give your comments below::

No further comments

6a What are your views on the information governance arrangements?

Give your comments below::

RTPI Scotland welcomes the proposed information governance arrangements. Moving forward, collaboration in the form of cross-sector data exchange will be important to ensure no duplication of efforts occur. The Scottish Government's Digital Taskforce is set to launch a range of new digital tools for planning and the place sector later this year. PHS should benefit from the information gathered through such digital information tools to help inform and coordinate its work.

6b How might the data and intelligence function be strengthened?

Give your comments below::

No comment.

7a What suggestions do you have in relation to performance monitoring of the new model for public health in Scotland?

Give your comments below::

In the Planning (Scotland) Bill as passed provisions for a National planning improvement co-ordinator have been included. RTPI Scotland recommends PHS supports Scottish Government in the production of regulation associated with this role and makes a clear commitment to aligning Planning with Public Health performance monitoring arrangements as part of this post.

7b What additional outcomes and performance indicators might be needed?

Give your comments below::

No comment

8 What are your views on the functions to be delivered by Public Health Scotland?

Give your comments below::

Health impact assessments are an important tool by which planners can identify potential harm or opportunities which development may create for health and well-being. However, RTPI Scotland has strong concerns about the current capacity of planning departments to undertake assessments. Research by RTPI Scotland has shown that planning departments have seen disproportionately large cuts to their budgets in last ten years when compared to other local authority departments. Since 2009 they have seen a 25% decrease in planning staff and a 40% real term cut in budgets.

In the Planning (Scotland) Bill as passed a duty has been placed on Scottish ministers to provide regulation associated with the assessment of health effects of national or major developments. PHS should work closely with Scottish Ministers to produce this regulation. Beyond issues associated with resourcing it is important that local authorities also have the appropriate skills and expertise to deliver improved health outcomes for society. Successful creation of health impact assessment guidance for local authority planning departments has, so far, been a product of collaborative working between health practitioners and planners. Therefore beyond the production of regulation, further support will be required for effective delivery. RTPI Scotland recommends that PHS seek to establish a Health Impact Assessment Support Unit, as seen in Wales, and that this include Place and Planning capacity and expertise to better support local decision making

9a What are your views on the health protection functions to be delivered by Public Health Scotland?

Give your comments below::

No comment

9b What more could be done to strengthen the health protection functions?

Give your comments below::

No comment

10 Would new senior executive leadership roles be appropriate for the structure of Public Health Scotland?

Yes

If so, what should they be? :

RTPI Scotland welcomes the proposed focus of senior executive roles, although would encourage there to be more focus on place and the built environment as part of one of the roles. We recommend an approach similar to Public Health England's Healthy Places Programme.

11 What other suggestions do you have for the organisational structure for Public Health Scotland to allow it to fulfil its functions as noted in chapter 5?

Give your comments below::

No comment

12 What are your views on the proposed location for the staff and for the headquarters of Public Health Scotland?

Give your comments below::

No comment

13 Are the professional areas noted in Chapter 8 appropriate to allow the Board of Public Health Scotland to fulfil its functions?

Yes

Give your comments below: :

No comment

14a What are your views on the size and make-up of the Board?

Give your comments below::

Given the critical impact of long-term placemaking on public health, RTPI Scotland would wish to see an individual on the board with clear ties to the built environment sector.

14b How should this reflect the commitment to shared leadership and accountability to Scottish Ministers and COSLA?

Give your comments below::

In order to achieve shared leadership and accountability between Scottish Ministers and COSLA, the size and make-up of the boards should be carefully balanced and proportionate. Therefore RTPI Scotland would wish to see one or two councillor members nominated by COSLA, not 'one or more' as stated in the consultation.

15 What are your views on the arrangements for data science and innovation?

Give your comments below::

RTPI Scotland supports the proposed arrangements for data science and innovation, given consideration to the points addressed in response to Q6(a).

16 What are your views on the arrangements in support of the transition process?

Give your comments below::

No comment

17a What impact on equalities do you think the proposals outlined in this paper may have on different sectors of the population and the staff of Public Health Scotland?

Give your comments below::

No comment

17b If applicable, what mitigating action should be taken?

Give your comments below::

No comment

18 What are your views regarding the impact that the proposals in this paper may have on the important contribution to be made by businesses and the third sector?

Give your comments below::

RTPI Scotland supports the Business Regulatory Impact Assessment (BRIA) that has been undertaken. To ensure more certainty and clarity for developers, provision of support for planning departments from PHS with health impact assessments, as discussed in response to Q8, will be important.

About you

What is your name?

Name:

Robbie Calvert, Policy and Practice Officer at RTPI Scotland

What is your email address?

Email:

Robbie.calvert@rtpi.org.uk

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

RTPI Scotland

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Very satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Very satisfied

Please enter comments here.: