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From: Kathryn Reilly [kreilly@Irishheart.ie]
Sent: 17 May 2018 10:28
To: !devplan
Subject: Irish Heart Submission to Development Plan
Attachments: FINAL Submission to Monaghan County Development Plan - May 2018.pdf

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To whom it may concern,

Please find attached a submission form the Irish Heart Foundation in relation to the Draft Monaghan County Development Plan 2019-2025.

Should you have any questions, do not hesitate to contact me directly.

Regards

Kathryn

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**IRISH HEART
FOUNDATION**
Fighting Heart Disease & Stroke

Irish Heart Foundation

Submission to the Draft Monaghan
County Development Plan 2019-2025

May 2018





About the Irish Heart Foundation

The Irish Heart Foundation is the national charity dedicated to fighting heart disease and stroke. Today in Ireland more people die from heart and stroke-related illnesses than from any other cause of death. Against this background we work to bring hope, relief and a better future to families all over Ireland. We give vital patient support through our Heart & Stroke helpline and we provide high quality public information for all.

We support pioneering medical research, campaign for improved patient care, and promote positive public health strategies. We work in hospitals, schools and workplaces to support, educate and train people to save lives. As a charity we are dependent on the generosity of the public to continue our vital good work. You can fund our work by making a donation, give of your time to volunteer or learn the skills needed to save a life through our courses.

SUBMISSION TO MONAGHAN COUNTY COUNCIL
Monaghan County Development Plan 2019-2025

May 2018

Introduction

The Irish Heart Foundation (IHF) welcomes the opportunity to input into this consultation on the 'Draft Monaghan County Development Plan 2019-2025' (hereafter 'Development Plan').

Under the Government's 2013 health and wellbeing framework – *Healthy Ireland* – planning authorities have a responsibility to promote healthy communities.

The IHF's submission will focus on how the Development Plan could be used to improve the public health of people living in Monaghan and, in particular, to ensure that children and young people are healthy and active. As highlighted in the Development Plan, Census figures indicate that there is a natural population increase and a decline in migration figures in Monaghan, with this trend likely to continue.

This submission firstly discusses why the IHF believes a specific public health objective should be integrated into the Development Plan. Secondly, it outlines the need for the environment around schools to support healthy lifestyles for young people. In particular, this section recommends the introduction of a no-fry zone¹ adjacent to schools in Monaghan.

This submission makes two primary recommendations:

1. Include 'promote a healthy environment' as a specific strategic objective in the Development Plan.
2. Introduce no-fry zones adjacent to schools, with the exclusion zone set at 1km. Maps showing the exclusion zones around each school should be provided with the final Development Plan.

¹The IHF uses the term 'no-fry zone' to refer to an exclusion zone for fast food/takeaways close to schools.

National public health objectives and the Monaghan County Development Plan

Recommendation 1:

Include 'promote a healthy environment' as a strategic goal in the Development Plan.

The current obesity crisis results from living in obesogenic environments: the environment around us has a powerful effect on a person's diet, physical activity levels and obesity. Although personal choices are important, obesogenic environments create dangerously high levels of obesity. Indeed, if we do not tackle this issue comprehensively now, we risk exacerbating an already dangerous crisis where:

- The direct and indirect cost of obesity in Ireland is estimated at around €1.13billion²
- The estimated excess lifetime cost attributable to childhood obesity and overweight is €16,036 per person³
- 55,056 premature deaths can be attributable to childhood overweight and obesity in the Republic of Ireland⁴

Environments can promote health but they can also cause ill health and obesity. The WHO define an obesogenic environment as "an environment that promotes high energy intake and sedentary behaviour. This includes the foods that are available, affordable, accessible and promoted; physical activity opportunities; and the social norms in relation to food and physical activity."⁵

A number of factors influence the obesogenic environment, including policy and commercial factors (trade agreements, fiscal and agricultural policies, marketing and food systems); the built environment (availability of healthy foods, infrastructure and opportunities for physical activity in the neighbourhood); social norms (body weight and image norms, cultural norms regarding the feeding of children and the status associated with higher body mass in some population groups, social restrictions on physical activity) and family environment (parental nutrition knowledge and behaviours, family economics, family eating behaviours).⁶

The IHF is calling on Monaghan County Council to place the promotion of healthy environments at the centre of the Development Plan. Development plans are a central means of implementing national policies in communities across Ireland. The strategic policy framework guiding the Development Plan is detailed in section 1.12. There is a significant gap in terms of public health policies in this section. The IHF recommends that reference be made to four policies in this section: the cross-government public health framework *Healthy Ireland. A Framework for Improved Health and Wellbeing 2013-2025*⁷; *Better Outcomes Brighter Futures. The national policy framework for children and young people*

² Department of Health. A Healthy Weight for Ireland- Obesity Policy and Action Plan 2016-2025. Dublin: The Stationery Office. Available from: <http://health.gov.ie/wp-content/uploads/2016/09/A-Healthy-Weight-for-Ireland-Obesity-Policy-and-Action-Plan-2016-2025.pdf>

³ Ivan J. Perry, Seán R. Millar, Kevin P. Balanda, Anne Dee, David Bergin, Laura Carter, Edel Doherty, Lorraine Fahy, Douglas Hamilton, Abigail Jaccard, André Knuchel-Takano, Laura McCarthy, Adam McCune, Grace O'Malley, Laura Pimpin, Michelle Queally and Laura Webber. (2017). What are the estimated costs of childhood overweight and obesity on the island of Ireland?. Safefood. ISBN: 978-1-905767-75- 5 Available from: <http://www.safefood.eu/SafeFood/media/SafeFoodLibrary/Documents/Publications/Research%20Reports/Cost-of-childhood-obesity-Report.pdf>

⁴ Ibid

⁵ WHO. (2016). Report of the commission on ending childhood obesity. Geneva: WHO. Available from: http://apps.who.int/iris/bitstream/handle/10665/204176/9789241510066_eng.pdf;jsessionid=ABB4F00758A3A976800536C61FD102F?sequence=1

⁶ WHO (2016) *Report of the Commission on Ending Childhood Obesity*. Geneva: WHO.

⁷ Department of Health. (2014). *Healthy Ireland. A Framework for Improved Health and Wellbeing 2013-2025*. Dublin: Stationery Office. Available from: <http://health.gov.ie/wp-content/uploads/2014/03/HealthyIrelandBrochureWA2.pdf>

2014-2020⁸; *A Healthy Weight for Ireland: Obesity Policy and Action Plan 2016 – 2025*⁹; and the local government policy *Local Area Plans - Guidelines for Planning Authorities*¹⁰.

Healthy Ireland. A Framework for Improved Health and Wellbeing 2013-2025

Healthy Ireland has made improving and protecting health a responsibility for all sectors of society, including across all Local Authorities and Government Departments. Under this national framework, planning authorities have a responsibility to promote healthy communities. The timeframe of the draft Development Plan runs simultaneously with the *Healthy Ireland* framework and will be one of the critical ways that the framework can be rolled out in Monaghan. Unfortunately, throughout the draft Development plan, not a single reference is made to *Healthy Ireland*.

Healthy Ireland - actions relevant to the drafting of Development Plans:

Action 1.9

Draw up specific proposals in relation to the potential role of local authorities in the area of health and wellbeing, having regard to the principles set out in Paragraph 2.5 of the Action Programme for Effective Local Government. Partners: DH, DECLG, local authorities, HSE Directorates.

Action 2.3:

Health and wellbeing impacts will be assessed locally and an integrated Social Impact Assessment approach at the local level will be mandated. Tools and supports for local authorities will be developed, to assist them in working across sectors at national and at county level in undertaking health and wellbeing assessments.

Partners in this role: DSP, DH, DECLG, Local authorities, HSE Directorates, County and City Managers' Association.

Better Outcomes Brighter Futures. The national policy framework for children and young people 2014-2020¹¹

The 2014 national policy framework for children and young people – *Better Outcomes, Brighter Futures*¹² (Department of Children and Youth Affairs) – also includes commitments to use the planning system to support healthy childhoods.

Better Outcomes, Brighter Futures (2014) – actions relevant to the drafting of Development Plans

“Government commits to:

- Develop child- and youth-friendly communities through Local Government adopting appropriate policies and objectives in County/City. Development Plans and further supported by the preparation and issuing of National Guidelines on Planning for Child-friendly Communities.
- Support children, young people and their parents to make healthier choices through education, addressing food poverty and ensuring that all educational and State institutions providing food and drink to children, whether directly or through franchised commercial

⁸ Department of Children and Youth Affairs. (2014). *Better Outcomes Brighter Futures. The national policy framework for children and young people 2014-2020*. Dublin: Stationery Office. Available from:

https://www.dcy.gov.ie/documents/cypp_framework/BetterOutcomesBetterFutureReport.pdf

⁹ See page 39 Department of Health. (2016). *A Healthy Weight for Ireland: Obesity Policy and Action Plan 2016 – 2025*. Available from: <http://health.gov.ie/wp-content/uploads/2016/09/A-Healthy-Weight-for-Ireland-Obesity-Policy-and-Action-Plan-2016-2025.pdf>

¹⁰ Department of Environment, Community and Local Government (2013) *Local Area Plans - Guidelines for Planning Authorities*.

¹¹ Department of Children and Youth Affairs. (2014). *Better Outcomes Brighter Futures. The national policy framework for children and young people 2014-2020*. Dublin: Stationery Office. Available from:

https://www.dcy.gov.ie/documents/cypp_framework/BetterOutcomesBetterFutureReport.pdf

¹² http://www.dcy.gov.ie/documents/cypp_framework/BetterOutcomesBetterFutureReport.pdf

services on-site, have a Healthy Foods policy and provide food that meets basic nutritional standards. (DES, DCYA, DSP)”

Local Area Plans - Guidelines for Planning Authorities

At local level, under the *Local Area Plans - Guidelines for Planning Authorities*¹³, issued under section 28 of the Planning and Development Act 2000-2012, there is also an onus on Local Authorities to incorporate a focus on active and healthy living in their communities. The key policies and objectives are to “deliver high-quality urban design that improves people’s quality of life”. The guidelines state “planning also has an important role to play in promoting and facilitating active and healthy living patterns for local communities”.

Local Area Plans - Guidelines for Planning Authorities (2013) - points relevant to the drafting of Development Plans:

“Regardless of the physical or locational context for local area plans, planning also has an important role to play in promoting and facilitating active and healthy living patterns for local communities. For example, the local area plan can promote active and healthier lifestyles by ensuring that:

- Future development prioritises the need for people to be physically active as a routine part of their daily lives;
- Pedestrians, cyclists and users of other modes of transport that involve physical activity are given the highest priority in transport and mobility strategies, policies and objectives;
- Public open spaces are located and delivered in a way that ensures they are capable of being easily reached on foot or bicycle by routes that are secure and of a high standard and that take biodiversity issues into account in their design;
- Any new workplaces are linked to walking and cycling networks;
- Play areas are designed to encourage varied and physically active play; and
- Exposure of children to the promotion of foods that are high in fat, salt or sugar is reduced such as the careful consideration of the appropriateness and or location of fast food outlets in the vicinity of schools and parks”

A Healthy Weight for Ireland: Obesity Policy and Action Plan 2016 – 2025

This national policy and action plan, launched by Government in 2016, aims to reverse obesity trends, to prevent health complications and reduce the overall burden for individuals, families, the health system and the wider society and economy. A critical tenet of this policy is the need to change the obesogenic environment. The importance of prevention by gradually changing Ireland’s food environment to one that facilitates consumption of healthier food and drinks and fosters active lifestyles should therefore be recognised in county development plans. The policy notes that food and retail outlets are more widely available now than ever before and that it is important that the “health input” into the local area planning process is consistent and evidence based.

Obesity Plan - Actions relevant to the drafting of development plans:

Action Point 2.1: “Develop guidelines and support materials for those working in developing the built environment for urban development and planning in relation to reducing the obesogenic environment”.

Make a strong commitment to public health in the Development Plan

The IHF believes that given the increased emphasis on public health in national policy, the Monaghan County Development Plan should more fully recognise the wide potential for planning to improve

¹³ Department of Environment, Community and Local Government (2013) *Local Area Plans - Guidelines for Planning Authorities*.

health outcomes and to reduce health inequalities within the community. To-date development planning processes across the country seems to have adopted a relatively narrow view of public health, primarily limited to the promotion of active travel and the provision of open spaces. The physical and built environments, including infrastructure planning, availability and accessibility of healthy foods, transport networks and the design of streets, can all affect the health and wellbeing of individuals and communities.

The IHF recommends that the promotion of health should be specifically mentioned in the Development Plan's vision. The strategic aim of the draft Development Plan is:

To facilitate sustainable development and to build on the strengths of County Monaghan by supporting the provision of employment opportunities and residential developments within quality urban and rural environments that provides a high standard of physical and social infrastructure necessary for their respective communities.

Section 1.11 outlines the seven strategic objectives of the Plan, none of which explicitly focuses on improving public health. The IHF recommends the inclusion of an additional objective to 'promote a healthy environment'. Similarly, the strategic aim of the Development plan could be strengthened to reflect the health, as well as economy, of the community. This could ensure that the subsequent Local Area Plans will include a focus on promoting good health for local communities. Including a specific health objective would ensure that land use decisions, the planning process, etc within the draft strategy will be 'health checked'. This 'health checking' should include a commitment to invest money in infrastructure which promotes public health and reject proposals which will negatively impact the health of the community in Monaghan.

Good health is not distributed equally amongst the population in any area of Ireland. Across Ireland, people living in the most deprived areas have the lowest life expectancy.¹⁴ Local socio-economic circumstances also strongly affect the prevalence of chronic conditions in an area. People living in more deprived areas are more likely to be affected by chronic conditions.¹⁵ Coronary heart disease is almost 2.5 times more prevalent and stroke 2.2 times more prevalent in the most deprived areas than in the least deprived areas.¹⁶ To reflect this, the development plan should also include a commitment to addressing health inequalities amongst the population in Monaghan County.

The IHF welcomes the commitments to promote and facilitate the development of walkways, following the publication of the second walking and cycling strategy in 2017 (policy CWP1); to protect and enhance public open spaces and established recreational green areas (policy CFP14); to support schools in providing safe routes and other active travel initiatives (policy CFP13); to promote the provision, improvement and expansion of sports facilities within the County (policy CFP5); and to support the protection of lands zoned as amenity/open space in settlement plans for recreational/amenity use (policy CFP15). Similarly, the IHF recognises the importance of strategic objective SSO7 to provide a wide range of amenity, sporting and cultural facilities including public spaces and parks.

It is essential that the facilities and infrastructure to support active travel are provided in Monaghan. Creating an environment conducive to active travel in communities which tend to be inactive could

¹⁴ Life expectancy is correlated with a person's social class, the affluence of the area in which they live and educational attainment. People with disabilities and carers also die younger, as do single persons and those who are widowed and divorced. CSO (2010) 'Mortality Differentials in Ireland'

http://www.cso.ie/en/media/csoie/census/documents/Mortality_Differentials_in_Ireland.pdf

¹⁵ Institute of Public Health (2010). *Making chronic conditions count*.

¹⁶ Balanda, K. et al. (2010). *Making Chronic Conditions Count: Hypertension, Stroke, Coronary Heart Disease and Diabetes*. Dublin: Institute of Public Health in Ireland.

play a significant role in reducing health inequalities. Poorly accessible neighbourhoods (including lack of accessible pavements and cycling paths) can impede older people and people with disabilities in particular from being physically active. Walking and cycling are cheap and potentially accessible to all. In conjunction with the National Heart Alliance, the Irish Heart Foundation published a report, *Building Young Hearts – physical activity, young people and the built environment*¹⁷, addressing the interplay between the physical environment and levels of physical activity amongst young people. The paper aims to show how the physical environment can improve young people's opportunities for physical activity and it recommends that the promotion of physical activity should be the key focus of policy for Local Authorities and Government. The report makes a number of recommendations, including: pedestrian and cyclist priority zones; lower speed limits in the proximity of all schools; and the introduction of 'park and walk'/'park and stride' zones directly outside schools, all of which should be considered for inclusion in the Development Plan.

Regulate for a Healthy Environment - Introduce No-Fry Zones in the Development Plan

Recommendation 2:

Introduce no-fry zones adjacent to schools, with the exclusion zone set at 1km. Maps showing the exclusion zones around each school be provided with the final Development Plan.

A current priority for many Local Authorities is the provision of schools. Attention should also be paid to ensuring that the environment around new and existing schools is healthy and suitable for children. In the drafting of the Development Plan, the IHF calls on Monaghan County Council to use its authority for land zoning and land use to limit access to fast food and the promotion of unhealthy foods in the vicinity of schools.

Currently the draft Development Plan does not expressly deal with fast food outlets and takeaways among other retail uses. While there are references to retail hierarchy and much emphasis is placed on the legacy of vacant retail floorspace left after the economic recession, no regard has been given in the plan to ensure that there is an appropriate mix of uses of the retail space so as to *prevent the development or concentration of fast food outlets or takeaways, particularly in the proximity of schools.*

It is important that health concerns be admissible in planning decisions, especially for sites close to schools. No-fry zones are increasingly receiving attention at Local Authority level. In July 2016, Wicklow County Council voted to accept objective RT17 to provide for no-fry zones in its Development Plan (see wording below). This was the first County Development Plan to include an explicit objective to develop no-fry zones.

Wicklow County Development Plan 2016-22
RT17, Objectives for Centres and Retail

Conscious of the fact that planning has an important role to play in promoting and facilitating active and healthy living patterns for local communities, the following criteria will be taken into account in the assessment of development proposals for fastfood/takeaway outlets, including those with a drive through facility:

- Exclude any new fast-food / takeaway outlets from being built or from operating within 400m of the gates or site boundary of schools or playgrounds, excluding premises zoned town centre;
- Fast food outlets/takeaways with proposed drive through facilities will generally only be acceptable within Major Town Centres or District Centres and will be assessed on a case-by-case basis;

¹⁷ Irish Heart Foundation and National Heart Alliance (2010) 'Building Young Hearts'. Dublin: Irish Heart Foundation.
http://www.irishheart.ie/iopen24/pub/building_young_hearts_final_pdf_2010.pdf

- Location of vents and other external services and their impact on adjoining amenities in terms of noise/smell/visual impact.

[For the purposes of RT17, "fast food/takeaway outlet" shall mean any outlet whose business will primarily be the sale of hot or otherwise prepared food that is high in fat, salt or sugar (such food being heated or prepared on the premises comprising of the outlet) for consumption on or off the premises comprising of the outlet.]

The development of No Fry Zones is recognised as an integral part of reducing the obesogenic environment. In fact, important national, and international, policies and reports have made specific recommendations on No Fry Zones and planning:

*A Healthy Weight for Ireland: Obesity Policy and Action Plan 2016 – 2025*¹⁸

Action Point 2.1: "Develop guidelines and support materials for those working in developing the built environment for urban development and planning in relation to reducing the obesogenic environment".

*British-Irish Parliamentary Assembly Committee D Report on Childhood Obesity*¹⁹

Recommendation: "Enhanced local planning powers, in particular regarding controls on the location and number of fast food outlets in the vicinity of schools"

*Better Outcomes Brighter Futures. The national policy framework for children and young people 2014-2020*²⁰

Commitment 4.10: Develop child- and youth-friendly communities through Local Government adopting appropriate policies and objectives in County/City Development Plans and further supported by the preparation and issuing of National Guidelines on Planning for Child-friendly Communities.

*Healthy Ireland. A Framework for Improved Health and Wellbeing 2013-2025*²¹

Action 2.3: Health and wellbeing impacts will be assessed locally and an integrated Social Impact Assessment approach at the local level will be mandated. Tools and supports for local authorities will be developed, to assist them in working across sectors at national and at county level in undertaking health and wellbeing assessments.

*Obesity and the environment: regulating the growth of fast food outlets*²²

"There are several reasons why the presence of fast food outlets may be undesirable from a public health perspective, with implications for planners. For example:

¹⁸ See page 39 Department of Health. (2016). *A Healthy Weight for Ireland: Obesity Policy and Action Plan 2016 – 2025*. Available from: <http://health.gov.ie/wp-content/uploads/2016/09/A-Healthy-Weight-for-Ireland-Obesity-Policy-and-Action-Plan-2016-2025.pdf>

¹⁹ BRITISH-IRISH PARLIAMENTARY ASSEMBLY TIONÓL PARLAIMINTEACH NA BREATAINE-NA hÉIREANN. (2017). REPORT from Committee D (Environment and Social) on Childhood Obesity July 2017. Available from: <http://www.britishirish.org/assets/com-D/BIPA-Cttee-D-Childhood-Obesity.pdf>

²⁰ Department of Children and Youth Affairs. (2014). *Better Outcomes Brighter Futures. The national policy framework for children and young people 2014-2020*. Dublin: Stationery Office. Available from: https://www.dcy.gov.ie/documents/cypp_framework/BetterOutcomesBetterFutureReport.pdf

²¹ Department of Health. (2014). *Healthy Ireland. A Framework for Improved Health and Wellbeing 2013-2025*. Dublin: Stationery Office. Available from: <http://health.gov.ie/wp-content/uploads/2014/03/HealthyIrelandBrochureWA2.pdf>

²² Public Health England, Chartered Institute of Environmental Health & Local Government Association. (2014). *Healthy people, healthy places briefing Obesity and the environment: regulating the growth of fast food outlets*. March 2014. Available from:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/296248/Obesity_and_environment_March2014.pdf (p5)

- improving access to healthier food in deprived communities may contribute to reducing health inequalities
- many hot food takeaways may generate substantial litter in an area well beyond their immediate vicinity
- discarded food waste and litter attracts foraging animals and pest species
- hot food takeaways may reduce the visual appeal of the local environment and generate night-time noise
- short-term car parking outside takeaways may contribute to traffic congestion”

Health organisations and the public are increasingly concerned about the impact on children of the number of fast food / take-away outlets located in close proximity to schools. The need for action to protect Irish children is strong. Prevalence of obesity in Ireland has increased significantly in the last two decades. There has been a tenfold increase in the rate of obesity among Irish boys between 1975 and 2016, and a ninefold increase among Irish girls. In 1975, only 1% of children in the State were classified as obese.²³ In 2016, 30.1% of girls and 31.6% of boys in Ireland were overweight, whilst 9% of girls and 10.2% of boys were obese.

Research by the World Obesity Federation predicts that by 2025, 241,000 schoolchildren in Ireland will be overweight or obese by 2025 and as many as 9,000 will have impaired glucose intolerance; 2,000 will have type 2 diabetes; 19,000 will have high blood pressure; and 27,000 will have first stage fatty liver disease.²⁴ The consequences for the future health of these children will be dire.

The Irish Heart Foundation fully support the introduction of no-fry zones and we believe that a greater sense of urgency must be attached to this. A body of research links over-concentration of and/or proximity to fast-food outlets and obesity.²⁵ Fast food is readily available beside Irish schools. Currently, 75% of Irish schools have at least one and almost 30% have at least five fast food outlets within 1km.²⁶ In the absence of proper regulation this situation can only deteriorate further given the business value to fast food outlets of being sited near schools. Studies also indicate that in order to buy something from a takeaway after school or at lunchtime, the takeaway needed to be located close by (on the way to school or a short walk). The Irish Heart Foundation believes that an effective no-fry zone would be set at 1km around a school (approximately equates to a 10-minute walk).

The Irish Heart Foundation believes it is inappropriate to continue to address the issue of new fast food outlets beside schools on a case-by-case basis at local level, requiring parents/schools to organise to appeal planning applications which are in opposition to national policy. A co-ordinated, national approach to protect the health of children and young people across the country is required. To support the work of Local Authorities, the Irish Heart Foundation is advocating for national level guidance for all Local Authorities on the introduction of no-fry zones adjacent to schools. Such guidance could be provided through a specific Department of Environment guideline addressing

²³ NCD Risk Factor Collaboration (NCD-RisC). (2017) Worldwide trends in body-mass index, underweight, overweight, and obesity from 1975 to 2016: a pooled analysis of 2416 population-based measurement studies in 128.9 million children, adolescents, and adults. *Lancet* 2017; published online Oct 10. [http://dx.doi.org/10.1016/S0140-6736\(17\)32129-3](http://dx.doi.org/10.1016/S0140-6736(17)32129-3).

²⁴World Obesity Federation. (2017). Ireland National Infographic. Available from: <http://www.obesityday.worldobesity.org/fullscreen-page/comp-it36nur2/068a7dcd-eb0d-4dd7-9cf6-1220ddc79ef0/60/%3Fi%3D60%26p%3D0a2r2%26s%3Dstyle-j84eeb5h>

²⁵ For example, see Currie, J., DellaVigna, Moretti, E. And Pathania, V. (2009) ‘The Effects of Fast Food Restaurants on Obesity.’ *American Association of Wine Economics* and Davis, B. and Carpenter, C. ‘Proximity of Fast Food Restaurants to schools and adolescent obesity’. *American Journal of Public Health*, 99 (3), 1541-8.

²⁶ Callaghan, M., I Molcho, M., Nic Gabhainn, S. and Kelly, C. (2015) ‘Food for thought: analysing the internal and external school food environment’. *Health Education*, 115(2), 152-170.

takeaways²⁷, similar to the approach taken to the provision of childcare facilities²⁸. Indeed, an excerpt from our pre-budget submission on progress to date is a cause of great concern on the lack of national guidelines available currently, and the slowness to act in response to the obesity plan action on same:

<i>A Healthy Weight for Ireland. Obesity Policy and Action Plan 2016-2025</i>	<i>Lead Responsibility</i>	<i>Update on Action</i>	<i>Irish Heart Foundation Response</i>	<i>Proposal</i>
Action Point 2.1: "Develop guidelines and support materials for those working in developing the built environment for urban development and planning in relation to reducing the obesogenic environment".	Department of Health, HSE	"Drafting has already commenced on potential terms of reference for the establishment of a working group to develop a set of guidelines in relation to the built environment. The group will comprise relevant Government Departments, the Health Service Executive, County and City Councils, Academics, and Professional Bodies among others". ²⁹	There is a clear contradiction in terms of what children learn via curriculum (importance of being active) when compared to the environment in which they function (lack of supportive environment). The delay in establishing the working group, coupled with the absence of the development of guidelines and support materials, is worrying. A body of research links over-concentration of and/or proximity to fast-food outlets and obesity. ³⁰ At present 75% of Irish schools have at least one and 30% have at least five fast food outlets within 1km ³¹ .	To support the work of local authorities, the IHF is advocating for national level guidance for all local authorities on the introduction of no-fry zones adjacent to schools and guidance on public health and health impact assessments within local authority development plans. The working group to develop guidelines and support materials for those working in developing the built environment must be set up as a matter of priority, with specific terms of

²⁷ See a list of current guidelines at See list of planning guidelines at:

<http://www.environ.ie/en/DevelopmentHousing/PlanningDevelopment/Planning/PlanningGuidance/>

²⁸ Government of Ireland (2001). Available at:

<http://www.environ.ie/en/Publications/DevelopmentandHousing/Planning/FileDownload.1601,en>.

²⁹ Parliamentary Question No 20832/17 of 02 May 2017

³⁰ For example, see Currie, J., DellaVigna, Moretti, E. and Pathania, V. (2009) 'The Effects of Fast Food Restaurants on Obesity.' American Association of Wine Economics and Davis, B. and Carpenter, C. 'Proximity of Fast Food Restaurants to schools and adolescent obesity'. American Journal of Public Health, 99 (3), 1541-8.

³¹ Callaghan, M., Molcho, M., Nic Gabhainn, S. and Kelly, C. (2015). *Food for thought: analysing the internal and external school food environment. Health Education*, 115(2), 152-170

				reference and timelines for reporting. This is of particular importance given the growth and projected increase in construction activity in Ireland. ³²
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With respect to recommendation 2.1, at its inaugural meeting the Obesity Policy Implementation Oversight Group agreed to establish two sub-groups for Reformulation and Healthy Eating. However, a working group to develop a set of guidelines in relation to the built environment has not progressed. However, in line with Actions 31 and 59 of the National Physical Activity Plan, which commit to developing guidelines and support materials for those working in developing the built environment, it is intended to hold a Stakeholder Forum in 2018 to focus on the theme of the Built Environment.³³ The IHF do not believe however that County Councils should wait until these guidelines are developed to incorporate no fry zones into their development plans and would encourage Councils to follow the Wicklow example.

The IHF is aware that taking action on fast food outlets is only part of the solution to improving the food environment, and there is a need to address the food available to students in schools, as well as the food available in shops near schools. Research by the IHF shows the high penetration of unhealthy food stuffs in Irish post-primary schools³⁴, including a 2015 survey³⁵ which found that while 37% of schools offered full hot meals and 37% offered cold snacks like sandwiches, nearly 70% of schools offered hot snacks including sausage rolls, pizza slices and paninis, many of which are high in fat and salt. A quarter of schools had tuck shops and almost a half had vending machines. In the coming months, the IHF will launch the Happy Heart @ School Catering Award programme which aims to ensure that heart-healthy options are provided and promoted to students, staff and visitors in post primary schools. Schools participating in the programme will be supported to adopt healthier cooking practices and provide healthier food choices.

As discussed above, the need for local planning to support healthy childhoods is supported by national level policies, including *A Healthy Weight for Ireland* and *Healthy Ireland*. Planning authorities can influence the built environment to improve health and reduce the extent to which it promotes obesity. During the drafting of the Development Plan, the IHF suggests that an audit of Local Authority licensing and catering arrangements in Monaghan County be undertaken with the intention of developing formal recommendations on reducing the proximity of fast food outlets to schools and other places where children congregate.

Promote food growing as a sustainable and health promoting use of green space

³² For example see <https://www.irishbuildingmagazine.ie/2017/04/10/ulster-bank-construction-pmi-report-roi-activity-rises-at-fastest-pace-in-five-months/> & <https://www.pwc.ie/media-centre/press-release/2017/scsi-pwc-construction-industry-survey.html>

³³ Parliamentary Question 2628/18 to the Minister for Health. Available from: <https://www.kildarestreet.com/wrants/?id=2018-01-18a.555&s=action+2.1#g559.r>

³⁴ Kelly, C. and NicGabhaunn, S. (2007) *Marketing of Foodstuffs in Post-Primary Schools in Ireland*. www.irishheart.ie

³⁵ Irish Heart Foundation (2015) Food provision in post primary schools. School survey, scoping exercise and pilot.

The Growing up in Ireland study shows that children from disadvantaged areas tend to live further away from larger supermarkets, with more fresh food such as fruit and vegetables.³⁶ It is essential that communities have access to healthy food. This may require local fresh food shops, public transport to large supermarkets, local food markets, as well as opportunities for people to grow their own food.

Planners can play a significant role in the development of 'healthy-weight environments'. The UK Town and Country Planning Association (TCPA) describe healthy-weight environments as supporting people in avoiding being overweight or obese through how an area is designed and what it provides. The TCPA set out guidance for how planning authorities can support healthy-weight environments³⁷ through: movement and access; open spaces, recreation and play; food; neighbourhood spaces; building design; and local economy. In terms of the food environment they suggest the following assessment criteria, which could be incorporated into the Monaghan County Development Plan:

- Development maintains or enhances existing opportunities for food growing;
- Development avoids over-concentration of hot food takeaways and restricts proximity to schools or other facilities aimed at children and young people;
- Shops / food markets sell a diverse offer of food choices and are easy to get to by bike, walking or public transport.

Conclusion

The IHF welcomes the opportunity to comment on the development of the Monaghan County Development Plan 2019-2025. The recommendations contained in this submission complement the strategic objectives of the plan to plan for greater social inclusion and to improve the quality of life of all who live and work in County Monaghan. Through adoption of these recommendations we believe that Monaghan County Council will meet their responsibilities under notable national plans, policies and strategies, such as *A Healthy Weight for All* and *Healthy Ireland*, as well as achieving the strategic aim of the plan.

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³⁶ Layte, R. and McCrory, C. (2011) *Growing up in Ireland - Overweight and obesity among 9-year olds*.

³⁷TCPA and Public Health England (2014) 'Planning healthy-weight environments'.

http://www.tcpa.org.uk/data/files/Health_and_planning/Health_2014/PHWE_Report_Final.pdf

