Betsi Cadwaladr University Health Board (BCUHB)
Response to Planning Application

10/10/2024

1. Application Reference

Application number	P/2024/1440
Application Details	Former Air Products Site, Llangollen Road, Acrefair, Wrexham LL14 3HP Outline Application for up to 159 Dwellings (Appearance, Landscaping, Layout and Scale Reserved)

2. Summary

This briefing presents the coordinated response from key directorates/departments within Betsi Cadwaladr University Health Board (BCUHB) to Wrexham County Borough Council on the following planning application:-

Location	Former Air Products Site, Llangollen Road, Acrefair, Wrexham LL14 3HP
Nature of development	Erection of up to 159 new dwellings, together with public open space, access and requisite infrastructure.
Proposal	Outline planning application for the erection of up to 159 new dwellings together with public open space, access and requisite infrastructure.

1. Public Health and Wider Determinants of Health

An individual's health is determined not only by their own behaviours, but also strongly impacted upon through the environment, buildings, street design, natural spaces and social networks. These are known as wider determinants of health, and are influenced by planning. All of the elements play a part in determining the health and wellbeing of the population and therefore are all important in creating healthy places. Substantial health inequalities exist in our communities, and planning and development plays a key role in addressing these inequalities.

This response will focus on some of these determinants in relation to this application and summarises the likely impact of the planning application on both public health issues in the immediate and surrounding areas and the impact upon local healthcare services.

The majority of the evidence referred to in the comments below is available in the Public Health Wales resources 'Creating healthier places and spaces for our present and future generations' and 'Planning and Enabling Healthy Environments: incorporating a template for planning policy', the Public Health England resource 'Spatial Planning for Health: an evidence resource for planning and designing healthier places', and Natural Resources Wales. Additional links are provided for specific sources of evidence on elements of the response.

In summary, our key recommendations are:

- Ensure that green and blue spaces are inclusive and accessible for all users. This includes providing informal play areas for children, spaces for older adults to stay active, rest, and socialise, and ensuring safe access for people with disabilities or impairments.
- While the focus on active travel is appreciated, further enhancements could include adding bicycle and scooter racks and storage in safe and accessible locations throughout the development.
- Design pedestrian routes to meet the needs of people with limited mobility, including sufficient dropped kerbs for wheelchair and pushchair users.
- Conduct a Health Impact Assessment to assess the potential effects of the development on the health and wellbeing of the population, particularly local residents.

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Green and blue spaces	The provision of green and blue spaces is important to health and wellbeing, and there is significant evidence, such as from the European Environment Agency, linking contact with the natural environment with improved health and wellbeing. Green and blue spaces benefit both the environment and human health. They include formal and informal places for children to play, and places for adults and children to socialise and meet each other. People with good access to green spaces are likely to be more active, and older adults can improve mobility through physical activity. Evidence indicates that undertaking physical activity in a natural setting also improves mental health outcomes more than physical activity undertaken in an indoor setting. Having access to parks and playgrounds is associated with reduced risk of obesity among young people. Wrexham County Borough Council Local Planning Guidance Note No. 10 *Public Open Space in New Housing Development* of the Local Development Plan provides the framework and requirements for open space provision, and accessible and useable green spaces. Components that contribute to green networks include parks and play areas, active travel routes and street trees, soft landscapes and verges. Spaces should be accessible and usable for all residents, and new developments are recommended to incorporate existing footpaths, public rights of way and, in some cases, create new rights of way for better linkages within developments.
Comment on application	Good consideration has been given to the inclusion of green spaces within the development**.** We welcome the provision of several bird boxes in the woodland/play area. This will give individuals and groups opportunities to engage with and enjoy local wildlife. Residents will be able to enjoy the green spaces within the development which will be positive for mental health and wellbeing. The play area and bird boxes will encourage outdoor play and give increased opportunities for physical activity. The bird boxes will additionally support biodiversity in the area.

	Green spaces should be accessible, safe, well maintained and provide the opportunity for use by differing members of the community, from children to older people, and include people with disabilities or restricted mobility.
Recommendations	• **Ensure Accessibility for All Users:** Develop the public open spaces to be fully accessible, incorporating features such as paved pathways, ramps, and tactile paving for individuals with disabilities, restricted mobility, and those using pushchairs or wheelchairs. • **Enhance Play Area Inclusivity:** Design the equipped play area to be inclusive of children of all abilities, incorporating accessible play equipment, sensory play elements, and sufficient seating for caregivers, while ensuring safe surfaces and clear visibility for supervision. • **Improve Connectivity to Local Amenities:** Enhance the proposed development of the walking and cycling paths to key local destinations with clear signage, safe crossings, and adequate lighting to encourage active travel and improve overall connectivity.

Walking and cycling	Supporting walking and cycling are crucial elements of enabling people to increase physical activity levels, and therefore benefit their health and wellbeing. Being able to be active in the areas people live, work and have leisure time is key to reducing obesity levels, increasing wellbeing and reducing stress. Evidence demonstrates that improving the infrastructure around walking and cycling can lead to health gains including an increase in physical activity, improved mobility among children, adults and older adults, and improvements in weight status. The Active Travel Act and the Placemaking Charter in Wales both strongly advocate and provide the evidence for the need for good quality walking and cycling routes which are segregated from traffic, well-lit and connected to existing routes and facilities. Wrexham County Borough Council Local Planning Guidance Note No.15 *Cycling* of the Local Development Plan supports the provision of high quality, safe, convenient and attractive cycling and walking routes that offer good connections to services, jobs and other neighbourhoods.

Comment on application	The Transport Assessment for the development concludes that the site is considered accessible for those travelling by foot, bicycle and public transport. There will also be dedicated pedestrian and cycle infrastructure within the development to promote active travel. The proposed site has access to a range of local amenities, which are accessible via foot and bicycle. There is also an existing Public Right of Way that will be integrated into the development. Wrexham's public transport infrastructure is within walking distance, with the closest bus stops 60m (Eastbound) and 100m (Westbound) from the proposed development. Buses run hourly and half hourly to Wrexham, Chirk, Oswestry, Ruabon and Llangollen with up to 9 services a day to Corwen, Dolgellau and Barmouth. Ruabon Railway station is 1.5 miles from the site and the transport assessment highlights how this can be accessed by walking, cycling or on public transport. Ruabon railway station provides connections to Chester, Holyhead, Shrewsbury and additionally Birmingham International and Cardiff Central. The transport assessment concludes 'the site is considered to be well located in terms of its accessibility by all the major non-car modes of transport and very well connected for a relatively rural location. These findings demonstrate that future residents will not be wholly reliant on the private car to travel for employment, education, leisure or retail purposes"
Recommendations	• **Enhance Active Travel Infrastructure:** Good consideration has been given to active travel, which is welcomed. To further support and encourage active travel, it is recommended to expand the provision of bicycle and scooter racks and storage in safe, accessible locations throughout the development, such as near residential entrances, community centres, and public transport stops. • **Improve Pedestrian Accessibility:** Ensure pedestrian routes are designed to meet the needs of those with limited mobility by providing sufficient dropped kerbs for wheelchair and pushchair users, as well as wide, unobstructed pathways. Additional measures like raised crosswalks and traffic calming features should be considered to enhance safety and accessibility.

	• **Provide Bicycle and Scooter Parking Facilities:** Provision of secure, covered racks and storage facilities should be made in convenient locations to promote cycling and scooter use as per the cycle parking standard in the Wrexham Council Supplementary Planning Guidance for parking standards. This will make these options more accessible and appealing for all residents. • **Improve Accessibility for Public Transport Users:** Ensure that clear, direct, and well-lit pedestrian routes connect the development to nearby public transport stops. Provide adequate seating and shelter at these stops to accommodate users, including older adults and people with disabilities. • **Address On-Street Parking Issues:** Implement additional traffic calming measures around the parking areas and nearby streets. This will help manage traffic flow, particularly during peak hours, and improve safety for pedestrians and cyclists.

Food: access to healthy food and the food retail environment	Having access to healthy food can improve health and wellbeing. It can support people to maintain a healthy weight and reduce their risk of developing long-term conditions. Availability of healthy food options and access to it is important to consider with regards to health inequalities. Increased access to unhealthier food retail outlets is associated with increased weight status and unhealthy eating behaviours among children in low-income areas. Gardening and community allotments have numerous benefits, such as increasing physical activity, and contributing to better mental health and wellbeing.
Comment on application	Within Wrexham, 27% of children aged 5 are overweight or obese. Spaces where we live, including local food growing opportunities and green spaces support child health and healthy weight. There is therefore an opportunity to consider provision of community growing spaces, allotments or community gardens within the development as a means to support health and increase mental and physical health and increase social cohesion.

Recommendations	• **Provide Accessible Growing Spaces:** Ensure that any community growing areas are accessible to all residents, including those with disabilities or limited mobility. Consider raised beds, paved pathways, and seating areas to encourage participation from a wide range of community members. • **Create Multi-Functional Green Spaces:** Design green spaces that are multi-functional, combining areas for active recreation, such as playgrounds or fitness trails, with quieter zones for gardening, relaxation, or social gatherings, to support both physical and mental well-being. • **Integrate Edible Landscaping:** Incorporate edible plants and trees, such as fruit trees, berry bushes, or herb gardens, throughout the development's green spaces. This can provide free, fresh produce for residents and encourage engagement with the local environment.

Areas for play	Access to places to play is critical for all children in the development of many skills, for exercise and for mental wellbeing. Increased access to playgrounds and recreational facilities is associated with increased walking among young people. Areas should be provided that are both traditional play areas but also innovative spaces that enable play to naturally occur. Wrexham County Borough Council Local Planning Guidance Note No. 10 *Public Open Space in New Housing Development* of the Local Development Plan provides the framework and requirements for open space provision, and accessible and useable green spaces
Comment on application	We welcome the inclusion of the play area in the proposed development, and that it is accessible for all proposed homes and the existing community. Consideration should be given to ensuring that this play area is accessible to children of all needs, including children with disabilities. We would like to see provision for informal play spaces for example, open grassy areas and using natural play elements in the proposals, which enable access to play for a wide range of ages.
Recommendations	• **Ensure Universal Accessibility of Play Areas:** Design the equipped play area to be fully accessible to children of all abilities, including those with

	disabilities. This should include the installation of accessible play equipment, such as wheelchair-friendly swings and ramps, sensory play elements, and soft surfaces to enhance safety and inclusivity. • **Create Informal Play Spaces for All Ages:** Incorporate informal play spaces throughout the development that cater to a wide range of ages and interests. These could include features like natural play elements (e.g., logs, rocks, or sand), open grassy areas for free play, fitness stations for older children and teenagers, and quiet zones for relaxation or imaginative play.

Building design	Well-designed buildings can improve the wellbeing, productivity and satisfaction of people working in them, and good quality housing can help reduce respiratory conditions, improve mental health and reduce health inequalities. The provision of affordable housing for vulnerable groups can lead to positive health-related outcomes. Homes that have adequate kitchen facilities, cycle storage and access to outdoor spaces also contribute to positive overall health and wellbeing.
Comment on application	The proposed development is for the construction of 159 new homes, the layout incorporates a mix of housing types including one, two-, three-, and four- bedroom homes that are no more than two storeys in height. Most dwellings are houses, some apartments are included in the development. As described in the Design and Access Statement the housing is comprised of: • 17 no. 2 bedroom bungalows • 24 no. 1-bedroom walk up flats • 49 no. 2-bedroom houses • 45 no. 3-bedroom houses, • 23 no. 4-bedroom houses Each dwelling has its own private garden space, bin storage, and parking in the form of marked bays, driveways and integrated and detached garages. There is also a solar panel layout document suggesting that each house includes solar panels. All of these are welcomed in order to meet local need.

Recommendations	• **Affordable Housing Provision:** Ensure the proportion of affordable housing includes 2- and 3-bedroom properties, to meet local demand and provide housing options for a wider range of income levels, including young families and first-time buyers. • **Ensure Diverse Housing Options for Accessibility:** Design some units, particularly the 1 bedroom apartments, to be fully accessible for individuals with disabilities or limited mobility. This includes features like step-free access, wider doorways, reinforced walls for grab bars, and adaptable layouts to accommodate future needs. • **Enhance Community Spaces:** We welcome the inclusion of shared community spaces, such as gardens or seating areas, to foster social interaction among residents. The communal spaces could include areas for community gardening, outdoor exercise equipment, or communal seating areas. • **Develop a Comprehensive Waste Management Plan:** Establish a clear plan for waste management and recycling facilities to ensure efficient waste disposal and encourage recycling among residents. This should include clearly marked bins, accessible recycling points, and regular waste collection schedules.

Air Quality and Noise	Evidence indicates that living in an area with clean air can lead to positive changes in health behaviours, and exposure to air pollution negatively impacts on health and wellbeing. Air quality can be improved through green infrastructure, active travel routes, reduction in traffic congestion and emissions. Noise has negative impacts on health and wellbeing. Long term exposure to environmental noise is linked to sleep disturbance, heart disease and premature death.
Comment on application	The centre of the development is located 0.4 miles to the local Primary School (Ysgol Acrefair), which impacts on traffic and noise in the morning and at the end of the school day. The inclusion of active travel, particularly for those attending the local school, will also help reduce noise and air pollution. The inclusion of electric vehicle charging points will also encourage the use of electric cars, reducing air and noise pollution.

	On the whole, however, the Noise Impact Assessment document shows that the predicted external and internal noise levels would fall under the Noise Exposure Categories measurements (NECs), and as such no noise mitigation measures are required. As stated in the Noise Impact Assessment, consideration should be given to potential noise from Air Source Heat Pumps (ASHPs).
Recommendations	• **Monitor Noise Levels Continuously:** While the Noise Impact Assessment indicates that noise levels are within acceptable limits, a plan for ongoing monitoring of noise should be established, particularly during peak traffic times (school start and end times). This will ensure that any unexpected increases in noise can be promptly addressed. • **Mitigate Potential Noise from Air Source Heat Pumps (ASHPs):**. Following detailed assessments, if necessary, consider installing noise-reducing measures such as acoustic enclosures or strategically positioning ASHPs away from sensitive areas. • **Enhance Traffic Noise Reduction Measures:** Since the development is 0.4 miles from the local Primary School (Ysgol Acrefair), consider implementing additional traffic noise reduction strategies, such as planting dense vegetation along the boundaries or using noise-reducing road surfaces to further minimise the impact of peak-hour traffic noise on residents. • **Promote Active Travel to Reduce Pollution:** Encourage active travel (walking and cycling) further by creating safe and direct pedestrian and cycling routes, especially for schoolchildren. Provide sheltered bike racks and adequate lighting along these routes to promote their use and further reduce noise and air pollution from vehicle traffic. • **Encourage the Use of Electric Vehicles (EVs):** Continue to promote the use of EVs by providing incentives or partnerships with local EV providers, and consider EV charging points to be available at the properties and in public areas, such as near schools, community centres, and local amenities, to further reduce emissions.

Inequities and health inequalities	Inequities exist across population groups, for example in employment, income, education, and in accessing services. There could be a number of disadvantaged groups within a population depending on the characteristics of the population.

	Groups could be age related, income related, groups who suffer discrimination such as people with disabilities or those from ethnic minority groups, or geographical groups such as areas of high deprivation. Inequalities in health are gaps in health status between different groups.
Comment on application	The proposed development is within the Cefn 2 Lower layer Super Output Area (LSOA). According to the 2019 Welsh Index of Deprivation, Cefn 2 is ranked 562 out of 1909 LSOAs in Wales. Within Wrexham, Cefn 2 is 24 out of 85 LSOAs in regards to deprivation, this places it among the 20-30% most deprived in Wales. A development in an area where inequities exist can have a positive influence on reducing inequalities, for example through providing new services or facilities, or access to green space or play areas. Evidence suggests that living in close proximity to green space, such as parks and other open spaces can improve health regardless of socioeconomic status. It is therefore encouraging to see consideration of green and open spaces within the proposed development to positively contribute towards addressing health inequalities and improving the health and wellbeing for the local population. The needs of the existing local community should be considered when planning a new development, because a new development will have an impact on those living nearby. This includes noise effects for those living in close proximity to the site. The proposed development seeks to provide affordable housing to meet the local housing needs and supporting the younger population of the area and the county. We welcome the reference to equality in the Design and Access Statement, noting ClwydAlyn's vision *"to provide equality to all residents, protection to the Welsh Language, and provide local employment, training and apprenticeships and job opportunities within the area of the project"* A health impact assessment involving stakeholders/interested parties, focusing on health and wellbeing and mitigating any potential negative impacts of the development would add value to the existing assessment.

Recommendations	• **Conduct a Comprehensive Health Impact Assessment (HIA):** Undertake a Health Impact Assessment to evaluate the potential effects of the development on the health and wellbeing of both new and existing residents. This should include an analysis of potential noise, air quality, and traffic impacts, particularly during the construction phase, and propose measures to mitigate any negative effects. • **Promote Use of the Welsh Language:** Conduct a linguistic assessment to identify ways to promote the use of the Welsh language within the development, such as incorporating Welsh names for streets, parks, and community facilities, and using bilingual signage.

2. Healthcare Service Provision

The following summarises the likely impact of the planning application on healthcare service provision in the immediate and surrounding areas.

Primary Care

Primary Care	Betsi Cadwaladr University Health Board is responsible for ensuring access to NHS primary care services in Acrefair, South Wrexham including General Practitioners (GPs), Community Pharmacists, Dentists and Optometrists. The Health Board works with a best practice GP to patient ratio of 1:2500
Comment on application	The GP registered population of Acrefair is 3,800 patients. There are no GP Practices in Acrefair, however the village falls within the boundaries of practices located within South Wrexham, including Cefn Mawr, Ruabon and Rhosllannerchrugog. Practices in South Wrexham have seen a steady increase in patient numbers over the last few years as a result of new housing developments in the immediate vicinity and new patients moving into the area. Each practice presently offer same day/next day access. Current clinical room capacity at most practices is almost at a maximum with very little room for further expansion. Lack of space within primary care premises may potentially affect future recruitment of additional staff. Concerns are shared across practices, who anticipate overstretching capacity to cater for new patients, which could affect both the health and wellbeing of existing GPs and their staff, resulting in a sustainability risk. The following examples have been introduced to help manage increased patient demand in the local area: • Urgent Primary Care Centres (UPCC) located in Wrexham Maelor Hospital's outpatient's department • Remote triage model whereby the patients' needs are matched with the available and most appropriate clinician

	• Training for receptionists in care navigation, which has upskilled staff to effectively signpost patients appropriately to on the day services such as urgent primary care, common ailments services at community pharmacies and minor injury units GP recruitment remains a priority area for the Health Board. We have an established GP Workforce Recruitment & Retention Plan, led by our Primary Care Academy, with a number of innovative schemes being implemented to attract additional GPs to the region. BCU continues to progress the recruitment and development of other health professionals such as Advanced Nurse Practitioners who are able to support patients with a range of health issues. Access to NHS Dentistry across South Wrexham, the East area and the Health Board in general remains challenging. Patients can choose to access dental services at locations most convenient to them, therefore access rates to NHS Dentistry within the area may not representative of the existing residential base. To help to address the difficulties in accessing NHS Dental Services, the Health Board has recently awarded non-recurrent funding in the Wrexham area for the provision of dental services and is currently undertaking a tender exercise for additional NHS Dental Services.