



Application number	P/2023/0593
Location	Land at Lower Berse Farm, Ruthin Road, Wrexham
Proposal	Residential development for up to 1520 dwellings, plus associated roads, open space, community facilities, a site for a primary school and a wastewater treatment (if necessary).

Betsi Cadwaladr University Health Board Public Health Team welcomes the opportunity to respond to this application.

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 public health issues in the immediate and surrounding areas.

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 recommendations are:

- Consideration to be given when developing the green and blue spaces to ensure that they are inclusive and accessible for all.
- Consideration could be given to separate cycling and pedestrian routes, and to ensure that cycle stands are available in safe, secure and accessible locations.
- Pedestrian routes should be designed to ensure the needs of those with limited mobility are considered by providing sufficient dropped kerbs for wheelchair users.
- Consider the provision of community food growing spaces within the green space of the development.
- Consider the inclusion of natural play facilities and play features for residents of all ages.
- Consider a range of home types, including the provision of safe and accessible housing for people with limited mobility.

- The provision of additional greenery where possible will contribute to improving air quality and reducing noise.
- Consider undertaking a Health Impact Assessment to assess the potential effects on the health of the population.

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 routes which are segregated from traffic, well lit and connect 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 concludes that the development will be supporting sustainable travel modes and that future residents will not be wholly reliant on private cars, which we are fully supportive of. The proposed site has access to a range of local amenities that can be made by foot and cycle, and there is an existing Public Right of Way that crosses the site. The public transport infrastructure available within Wrexham is within walking distance from the site, with the closest bus stop within 400m. It is encouraging that shared footways / cycleways will be provided along the site's frontage on the A525 Ruthin Road & through to B5099 Bersham Road.
Recommendations	In order to improve access to cycling, consideration could be given to separate cycling and pedestrian routes, and to ensure that cycle stands are available in safe, secure and accessible locations. Pedestrian routes should also be designed to ensure the needs of those with limited mobility are considered by providing sufficient dropped kerbs for wheelchair users.

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 more likely to be more active, and older adults can improve mobility with 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.
Comment on application	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	It is suggested that consideration is given to the range of users of green and blue spaces, and their needs, to ensure that the spaces are inclusive and accessible for all. For example informal play opportunities for children, spaces for older adults to be physically active but also to rest and socialise, and ensuring that people with disabilities or impairments are able to access the spaces equally.

Food: access to healthy food and the food retail environment (including hot food takeaways)	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 the 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	Consideration could be given to the provision of community food growing spaces such as community gardens or growing areas within the green space of the development site. However, it must be noted that there would be maintenance requirements and this therefore would need to be considered.
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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	It is promising to see the proposed development includes suitably equipped play provision including: • 5 Local Areas For Play (LAPs) • 3 Locally Equipped Areas for Play (LEAPs) • 1 Multi Use Games Area (MUGA) • 1 Neighbourhood Equipped Area for Play (NEAP). It should be ensured that play areas and open spaces are plentiful, accessible, safe and well maintained and should provide the opportunity for use by differing members of the community including people with disabilities. However, it must be noted that there would be maintenance requirements and this therefore would need to be considered.
Recommendations	Consideration for play access for children has been considered. Consideration could also be made for the inclusion of natural play facilities and features for residents of all ages.

Building design	Well-designed buildings can improve the wellbeing, productivity and satisfaction of people working 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 health-related outcomes. Homes that have adequate kitchen facilities, cycle storage and access to outdoor spaces also contribute to overall health and wellbeing.
Comment on application	Given this is an outline application the housing mix of the development has yet to been determined. We would encourage a range of home types, including the provision of safe and accessible housing for people with limited mobility.

Recommendations	Consider a range of home types, including the provision of safe and accessible housing for people with limited mobility.
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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 deaths.
Comment on application	In regards to noise and air pollution from vehicles, it is proposed to reduce the speed limit of Berse Lane from 50mph to 30mph. The development's Noise Impact Assessment shows that consideration has been given to noise levels from Ruthin Road, the A483 and Bersham Road. The assessment outlines mitigating measures such as higher specification glazing to be used as required and good acoustic design will be followed. The Welsh Government Electric Charging Strategy for Wales (2021) outlines that there will be the introduction of "requirements for new homes to be ready for charging through changes to Building Regulations as well as promoting the wider support available for those wanting to install charging at home." Therefore, consideration should be given to including electric vehicle charging points for sustainability and environmental benefits. The green infrastructure includes the provision of high quality open space whilst retaining the existing woodland, trees and hedgerows.
Recommendations	Consideration should be given to including electric vehicle charging points for sustainability and environmental benefits. The provision of additional greenery where possible will contribute to improving air quality and reducing noise.

Inequities and health inequalities	Inequities exist across population groups, for example, in employment, income, education, access to 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	A development in an area where inequities exist can have a positive influence on addressing some of these, 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 for green and open spaces within the proposed development to positively contribute towards health and wellbeing. The needs of the existing local community should be considered when planning a new development, because a new development will have an effect on those living nearby. This includes noise effects for those living in close proximity to the site during the construction phase. The proposed development is predicted to support the employment of 4,712 people therefore having short-term economic benefits. As well as providing opportunities for 51 apprentices, graduates or trainees. It is encouraging to see that the proposed development includes the provision of affordable housing, approximately 15% of the total housing.
Recommendations	It is recommended that a Health Impact Assessment be undertaken for large scale developments, as this will help assess the potential effects on the health of a population (both for those who may be living in any new development but also the existing community), and also the distribution of these effects across the population. The HIA can highlight ways in which health gain can be maximised and risks to health minimised, and it will consider the needs of the range of population groups. For advice on carrying out a HIA, visit the WHIASU website.
IHC Comment and Recommendations	The level of proposed population growth is relatively significant but is within the parameters recognised as part of the agreed Local Delivery plan therefore the IHC has no formal objection for the proposed development on Land at Lower Berse Farm, Ruthin Road, Wrexham. The Outcome of the suggested HIA described above will be key in helping to understanding the specific needs of the proposed development and the subsequent impact on Health Service Delivery and access to both NHS Primary and Secondary Care. The area is currently served by a number of Primary Care sites and GPs although most of these are at or towards the limits of their existing patient list size primarily due to physical capacity. Therefore as the development is of a relatively large scale we would recommend that new registrations are distributed across all practices who cover the area based on the specifics of the situation at the time of patient registration. Wrexham County Borough Council and Betsi Cadwaladr University Health Board partnered together to commission to deliver a feasibility study that identifies the need for and scope of co-located integrated health and social care services and intermediate care facilities. The outcome of the study is expected in December 2023 and will provide a range of options (including a recommended option) that will support the development of an integrated Health and Social Care service.

	Whilst the outcome of this will not be known until later in the year it is highly likely it will recommend looking at the redevelopment of an existing site or the development of a new site to take forward future integration plans. On this basis we would be looking to apply for a Section 106 contribution to support this potential development to achieve the required additional capacity.
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