This briefing presents a response from the Public Health team within Betsi Cadwaladr University Health Board to Wrexham County Borough Council on the following planning application: -

Application number	P/2025/0102
Location	13 King Street, Wrexham, LL11 1HF
Proposal	Change of use of building from Class A1 (Butcher) to A3 (Hot food takeaway)
Deadline for response	28.05.2025

1. Summary

In summary, the BCUHB Public Health Team would like to highlight the following:

- **Proximity to educational settings:** The proposed site is located less than 1 mile from nine educational institutions. The close proximity to these settings is particularly concerning, as it increases the likelihood of children and young people being exposed to and influenced by unhealthy food choices.
- **Proximity to existing establishments:** The site is surrounded by an already high density of takeaways, restaurants, and shops that predominantly sell food and drinks high in fat, salt, and sugar. Adding another unit to this mix would further contribute to the existing obesogenic environment, making it harder for the local population and visitors to access and choose healthier food options.
- **Local health challenges**: The local area is already facing significant health challenges related to overweight and obesity among children, young people, and adults. The addition of another outlet serving predominantly unhealthy food would likely exacerbate these issues, rather than support efforts to improve public health outcomes.

2. Planning and healthy food environment

An individual's health and well-being is strongly impacted upon by the surrounding environment. Planning, street design and food retailers play an important part in creating healthy places and influencing healthy choices[i].

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 and accessibility of healthy food options can impact on health inequalities. Increased access to unhealthy food retail outlets can be

associated with increased weight status and unhealthy eating behaviours among populations in low-income areas[ii].

The causes of overweight and obesity are complex and multifaceted, including social, economic, biological, and environmental factors. These factors contribute to the 'obesogenic' environment, which is an important determinant of both energy intake and expenditure[iii].

Public health interventions targeted at controlling the availability of, or exposure to, palatable, inexpensive foods and drinks with a high energy density, are likely to be part of any successful broader strategy to reduce overweight and obesity and improve health and well-being.

Excess weight in children often leads to excess weight in adults, and this is recognised as a major determinant of premature mortality and avoidable ill health. Children who are already obese by secondary school age are likely to be at risk of health problems into adulthood; children will already have become addicted to foods high in fat, salt, and sugar by the time they get to secondary school.

Long-term impacts of eating food high in fat, salt, and sugar are of concern to public health. There is a correlation between diet and health, and the contribution played by fast food outlets must be taken into account[iv].

We would welcome Wrexham County Borough Council considering the following information, and key areas of evidence when responding to this application.

3. National Policies

3.1 Healthy Weight: Healthy Wales

Healthy Weight: Healthy Wales (HWHW)[v] is the Welsh Government's long-term strategy to prevent and reduce obesity in Wales. Healthy Environments is a priority area within the strategy with the Food Environment being one of the key themes alongside the Active Environment.

By 2030 the strategy aims to create:

- Food environments where healthier food and drink is widely available, appealing, and affordable, making the healthier choice the easy choice.

3.2 The Well-being of Future Generations Act

HWHW is supported by The Well-being of Future Generations Act[vi], which requires public bodies in Wales to think about the long-term impact of their decisions, to work better with people, communities and each other, and to prevent persistent problems such as poverty, health inequalities and climate change. This legislation provides a unique opportunity in Wales to create positive change by working collectively to protect the health and wellbeing of our future generations.

3.3 National Institute for Health and Care Excellence

The National Institute for Health and Care Excellence (NICE) Cardiovascular disease prevention[vii], and the All Wales Obesity Pathway[viii] also recommend that Local Authorities should '*limit the number of fast food outlets in specific areas, such as close to schools'*.

3.4 Sustain, the alliance for Better Food and Farming Hot Food Takeaways: Planning a route to healthier communities

Planning a route to healthier communities[ix] highlights a review of the impact of hot food takeaways near schools in the UK on childhood obesity, which found good evidence of more hot food takeaways in deprived areas, and children who spend time in deprived neighbourhoods tend to eat more fast food and have a higher Body Mass Index.

3.5 Eatwell Guide

The government's Eatwell Guide[x] (previously Eatwell Plate) was updated in 2016 to recommend that foods high in fat, salt and sugar are eaten less often and in small amounts. A large proportion of the items on the menus of the fast-food restaurants, cafes, and hot food takeaways in close proximity to the proposed site are high in fat, salt, and sugar, and are therefore considered as less healthy.

4. Local Context

4.1 Local Development Plan / Supplementary Planning Guidance

Wrexham County Borough Council Local Development Plan[xi] (LDP) provides the framework and requirements when planning applications are to be considered.

Wrexham County Borough Council Local Planning Guidance note No.9[xii] provides the framework and requirements for Hot Food Take-Aways. Therefore assurance is required for the application both with respect to the guidance note and to ensure that the location of this application does not deviate from the acceptable use regarding town centre location and concentration.

4.2 Location – proximity to education settings

The proposed site at a dropped pin (53.047591246551434, -2.997320764675811) is less than a mile / less than a 20-minute walk from the following educational settings. Google Search undertaken on 12th May 2025.

Higher Education

- 0.2 miles 5 -minute walk from Coleg Cambria, Yale Campus
- 0.7 miles 16 -minute walk from Aspris College North Wales, Wrexham

Secondary Schools

- 0.5 miles 11-minute walk from Wrexham Pupil Referral Services
- 0.8 miles 10-minute walk from St Joseph's Catholic & Anglican High School

Primary Schools

- 0.3 miles 7-minute walk from St Mary's Catholic Primary School
- 0.6 miles 13-minute walk from St Giles' Church in Wales Primary School
- 0.6 miles 13-minute walk from Victoria Community Primary School
- 0.6 miles 13-minute walk from Alexandra Community Primary School
- 0.7 miles 15-minute walk from Rhosddu Primary School

The close proximity to these settings is particularly concerning, as it increases the likelihood of children and young people being exposed to and influenced by unhealthy food choices.

Although we recognise that pupils in primary education are not allowed to leave school premises during the day, research indicates that the most popular time for purchasing food from shops is after school [xiii].

The proximity of the proposed development to the secondary school and Pupil Referral Service is concerning both from a lunchtime and school finish time perspective. This is in terms of the provision and availability of unhealthy foods to children and young people.

4.3 Location – proximity to existing hot food takeaways

This proposed application sits on 13 King Street, Wrexham LL11 1HF and a number of hot food takeaways are already within the immediate surrounding (i.e., within half a mile of the application).

A search on Google Maps using a dropped pin (53.047591246551434, -2.997320764675811) on the 12th of May 2025 highlights the concentration of such eating establishments nearby.

The following are shown to be located less than or equal to half a mile / less than a 10-minute walk from the proposed site:

- La Baguette & Co. – 203ft, 1- minute walk
- McDonalds – 0.1 miles, 2 - minute walk
- Papa John's Pizza – 0.1 miles, 2 - minute walk
- Wrexham Fish Bar – 0.1 miles, 3- minute walk
- Pepe's – 0.1 mile, 3-minute walk
- Ljazz Indian Cuisine, 0.1 miles, 3- minute walk
- Domino's Pizza, 0.2 miles, 5 -minute walk
- McDonalds, 0.2 miles, 5 – minute walk
- Wrexham Eats, 0.3 miles, 6-minute walk
- Pizzano, 0.3 miles, 6-minute walk
- Pizza Palace & Charcoal Grill – 0.3 miles, 6-minute mile
- Smash & Dough, 0.3 miles, 7-minute walk
- Curry On The Go, 0.4 miles, 7-minute walk
- Everland Fish Bar, 0.4 miles, 8- minute walk
- KFC, 0.4 miles, 8-minute walk
- Jones's Fish & Chip shop, 0.4 miles, 9-minute walk
- TryThaiShop & Noodle Bar

Research indicates that increased access to unhealthier food retail outlets is associated with overweight and obesity in the general population, and increased obesity and unhealthy eating behaviours among children[xiv].

Whilst we appreciate this is only one extra unit, this would still be one extra unit than is currently available and it is this addition to the cumulative impact that is of concern.

We do not consider the location of this site to be beneficial to the health of the local population due to the proliferation/concentration of existing hot food takeaways.

5. Health challenges

i. Overweight and obesity

Excess weight in children often leads to excess weight in adults, and this is recognised as a major determinant of premature mortality and avoidable ill health. Children who are already obese by secondary school age are likely to be at risk of health problems into adulthood. Children will potentially already have become addicted to foods high in fat, salt, and sugar by the time they get to secondary school.

Data from the Child Measurement Programme 2022-2023[xv] shows that within Wrexham County Borough Council:

- **28.1%** of children aged 4-5 years are living with overweight or obesity which is higher than the BCUHB average of **25.9%** and the All-Wales average (**24.8%)**
- **13.4 %** of children aged 4-5 years are living with obesity which is higher than the BCUHB average of **12.1%** and the All-Wales average **(11.4%)**

Data from the National Survey for Wales 2021-2022[xvi] shows that in Wrexham County Borough Council

- **60%** of adults aged over 16 years are living with overweight or obesity compared to the BCUHB average **(59%)** and the All-Wales average **(62%).**
- **20%** of adults aged over 16 years are living with obesity compared to the BCUHB average **(23%)** and the All-Wales average **(25%).**

ii. Deprivation

This application is within Grosvenor 2 LSOA. According to the 2019 Welsh Index of Deprivation this ward is ranked number **430** out of 1,909 local areas in Wales, which places it among the **20-30 %** most deprived [xvii]

Areas of deprivation commonly face health challenges such as higher levels of obesity and inequalities in health, leading to lower life expectancy and lower healthy life expectancy.[xviii] There is a known association between levels of obesity and overweight, deprivation and a proliferation of take-away outlets [xix].

6. References

[i] Creating healthier places and spaces for our present and future generations - World Health Organization Collaborating Centre On Investment for Health and Well-being (phwwhocc.co.uk)

[ii] Spatial Planning for Health: an evidence resource for planning and designing healthier places (publishing.service.gov.uk)

[iii]Tackling Obesities: Future Choices – Obesogenic Environments – Evidence Review.07-735-obesogenic-environments-review.pdf (publishing.service.gov.uk)

[iv] Microsoft Word - Planning and Enabling Main Resource v8.docx (nhs.wales)

[v]https://www.gov.wales/sites/default/files/publications/2019-10/healthy-weight-healthy-wales_0.pdf

[vi] Well-being of Future Generations (Wales) Act 2015 – The Future Generations Commissioner for Wales

[vii]National Institute for Health and Care Excellence. Cardiovascular disease prevention (nice.org.uk)

[viii]Welsh Government. obesity-pathway.pdf (gov.wales)

[ix]Sustain. Hot Food Takeaways: Planning a route to healthier communities https://www.sustainweb.org/secure/Hot_food_takeaways.pdf

[x] Public Health England. The Eatwell Guide (publishing.service.gov.uk)

[xi] Wrexham Local Development Plan 2 (LDP2) 2013 to 2028 | Wrexham County Borough Council

[xii] Local Planning Guidance Note No 9 - Hot Food Take-Aways

[xiii] Children's Food and Drink Purchasing Behaviour "Beyond the School Gate": The Development of a Survey Module - PMC (nih.gov)

[xiv] https://www.sustainweb.org/secure/Hot_food_takeaways.pdf

[xv]https://phw.nhs.wales/services-and-teams/child-measurement-programme/cmp-2022-23/1-cmp-report-2022-2023/

[xvi]https://statswales.gov.wales/Catalogue/National-Survey-for-Wales/Population-Health/Adult-Lifestyles/adultlifestyles-by-healthboard-from-202021

[xvii] WIMD - Home Page

[xviii] WIMD - Betsi Cadwaladr University Health Board

[xix] The association between the presence of fast-food outlets and BMI: the role of neighbourhood socio-economic status, healthy food outlets, and dietary factors | BMC Public Health | Full Text