

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/2024/0298
Location	1-2 High Street, Wrexham, LL13 8HP
Proposal	Change of use of building from class a2 (building society) to class a3 (coffee shop)
Deadline for response	12 June 2024
Date of submission	24 May 2024

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Public Health Team response

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

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.

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 is important to consider with regards to 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.

The causes of overweight and obesity are complex and multifaceted, including social, economic, biological and environmental factors but the overall impact of the 'obesogenic' environment is an important determinant of both energy intake and expenditureⁱ.

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, sugar and salt by the time they get to secondary school.

Long-term impacts of eating food high in fat, sugar and salt 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.

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

1. National Policies

1.1 Healthy Weight: Healthy Wales

[Healthy Weight: Healthy Wales](#) (HWHW)ⁱⁱ 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.

1.2 The Well-being of Future Generations Act

HWHW is supported by [The Well-being of Future Generations Act](#)ⁱⁱⁱ, 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.

1.3 National Institute for Health and Care Excellence

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

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

[Planning a route to healthier communities](#)^{vi} 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.

1.5 Eatwell Guide

The government's [Eatwell Guide](#)^{vii} (previously Eatwell Plate) was updated in 2016 to recommend that foods high in salt, fat 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/or sugar, and are therefore considered as less healthy.

2. Local Context

2.1 Local Development Plan / Supplementary Planning Guidance

On a local policy level, [Local Planning Guidance Note No. 9](#) (LPG)^{viii} provides the framework and requirements for Hot Food Take-Aways.

2.2 Location – proximity to education settings

The proposed site is less than a mile / less than a 20 minute walk from the following schools and college:

- St. Mary's Catholic Primary School, Lea Rd. 0.2 miles / 5 minute walk
- St. Giles School, Madeira Hill 0.3 miles / 7 minute walk
- Coleg Cambria – Yale, Grove Park Rd 0.4 miles / 8 minute walk
- Alexandra CP School, Bodhyfryd 0.5 miles / 12 minute walk
- Wrexham Pupil Referral Service, 82 Rhosddu Rd. 0.6 miles / 14 minute walk
- Victoria CP School, 3 Poyser St. 0.5 miles / 12 minute walk
- St. Joseph's Catholic & Anglican High School, Sontley Rd. 0.6 miles / 13 minute walk
- Rhosddu Primary School, Price's Lane 0.8 miles / 19 minute walk

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

3. Location – proximity to existing hot food takeaway, existing restaurants / shops selling predominantly food and drinks high in fat, salt and sugar

Increased access to unhealthy food retail outlets can be associated with increased weight status in the general population, and increased obesity and unhealthy eating behaviours among children residing in low-income areas. Whilst we appreciate, this is only one extra food outlet, this would still be one additional premises than what is currently available and it is this cumulative impact that is of concern.

This proposed application sits on 1-2 High Street, Wrexham, LL13 8HP and a number of food outlets selling predominantly food and drinks high in fat, salt and sugar are already within the immediate surrounding (within half a mile of the application).

A search on Google Maps (15 May 2024) highlights the concentration of such eating establishments nearby. The following are shown to be located close to the proposed site [please note: this is not an exhaustive list]:

- Frankies 66ft / 1 minute walk
- Tabernacl 85ft / 1 minute walk
- High Street Feeder 118ft / 1 minute walk
- Café de Galles 144ft / 1 minute walk
- Lisbon Tapas Restaurant 144ft / 1 minute walk
- Andy's American Diner 151ft / 1 minute walk
- Figo's Charcoal Grill & Pizza Palace 161ft / 1 minute walk

- Turkish Delight 164ft / 1 minute walk
- Charcoal Grill 217ft / 1 minute walk
- Sizzle 246ft / 1 minute walk
- Smash & Dough 262ft / 1 minute walk
- Pizzano 299ft / 1 minute walk
- Chicken-U-Like 312ft / 2 minute walk
- Bank Street Social 348ft / 1 minute walk
- Fried Chicken UK Wrexham 364ft / 2 minute walk
- Poundbakery 400ft / 2 minute walk
- A Marubbi & Son 400ft / 2 minute walk
- Sakura 407ft / 2 minute walk
- Central Kebab and Pizza 466ft / 2 minute walk
- Gerrards 0.1 mile / 2 minute walk
- Chick-n-Mo 0.1 mile / 2 minute walk
- The Smoke Shed 0.1 mile / 2 minute walk
- Central Kebab & Burger House 0.1 mile / 2 minute walk
- Tracey's Café 0.1 mile / 2 minute walk
- Caffè Nero 0.1 mile / 3 minute walk
- Nightingales Café 0.1 mile / 3 minute walk
- Levant Kitchen & Bar 0.1 mile / 3 minute walk
- Kristina's Café 0.1 miles / 3 minute walk
- King Pizza Kebab 0.1 mile / 3 minute walk
- Eastern Touch 0.1 mile / 3 minute walk
- Flame 0.1 mile / 3 minute walk
- Baps 0.1 mile / 3 minute walk
- Black Peppers 0.1 mile / 3 minute walk
- Thai Dine 0.1 mile / 3 minute walk
- Notorious Eat'z In the Streetz 0.1 mile / 3 minute walk
- The Priory Café 0.2 mile / 3 minute walk
- Kaspas 0.2 mile / 3 minute walk
- Heaven Coffee Shop 0.2 mile / 4 minute walk
- Vasco Da Gama 0.2 mile / 4 minute walk
- Wrexham Fish Bar 0.2 mile / 4 minute walk
- McDonald's 0.2 mile / 4 minute walk
- Greggs 0.2 mile / 4 minute walk
- Lot 11 0.2 miles / 4 minute walk
- Pizza Hut Wrexham 0.2 miles / 4 minute walk
- Ko Sing Takeaway 0.2 mile / 4 minute walk
- Ijazz 0.2 mile / 5 minute walk
- Chopstix 0.2 mile / 5 minute walk
- The PIE'd PIE'per 0.2 mile / 5 minute walk
- Curry-on-the-go 0.2 miles / 5 minute walk
- Subway 0.2 miles / 5 minute walk
- Everland Fish Bar 0.2 miles / 5 minute walk
- The Wing King 0.2 mile / 5 minute walk
- to^st (toast) cafe and deli 0.2 mile / 5 minute walk

- Prestige Kebabs 0.2 mile / 5 minute walk
- Maxim M&G Bar & Restaurant 0.2 mile / 5 minute walk
- KFC 0.2 mile / 5 minute walk
- Manna Christian Bookshop & Coffee Shop 0.2 mile / 5 minute walk
- Jones's Fish & Chip Shop 0.2 mile / 6 minute walk
- Wrexham Bakeshop & Café 0.3 miles / 6 minute walk
- Imperial Chicken 0.3 miles / 6 minute walk
- Wrexham Kebab & Pizza 0.3 miles / 6 minute walk
- Perfect Pizza 0.3 miles / 6 minute walk
- Caprinos Pizza 0.3 miles / 6 minute walk
- La Baguette 0.3 mile / 6 minute walk
- Sleepy Panda 0.3 mile / 6 minute walk
- Try Thai Shop & Noodle Bar 0.3 mile / 6 minute walk
- Costa Café 0.3 mile / 6 minute walk
- Sarah Restaurant 0.3 mile / 7 minute walk
- King's Noodle Bar 0.3 miles / 7 minute walk
- Iâl Restaurant 0.3 miles / 7 minute walk
- Divine Thai & Bubble Tea Shop 0.3 mile / 7 minute walk
- Papa John's Pizza 0.3 mile / 7 minute walk
- Domino's Pizza 0.3 mile / 7 minute walk
- Pepe's 0.3 mile / 8 minute walk
- Tesco Café 0.3 mile / 8 minute walk
- Yellow & Blue 0.3 mile / 8 minute walk
- China China 0.3 mile / 8 minute walk
- Nando's 0.4 mile / 9 minute walk
- Anise 0.4 mile / 9 minute walk
- Flavour of Portugal 0.4 mile / 9 minute walk
- Eats & Treats 0.4 mile / 9 minute walk
- The Lemon Tree Restaurant 0.4 mile / 10 minute walk
- Bellevue Grill and Fish Bar 0.4 mile / 10 minute walk
- Burger King 0.5 mile / 11 minute walk
- Caffi Cwtch 0.5 mile / 11 minute walk
- Starbucks 0.5 mile / 11 minute walk
- Pausa Coffee Shop 0.5 mile / 12 minute walk
- Marmaris Kebab & Pizza 0.5 mile / 11 minute walk
- Gourmet Coffee Bar 0.5 mile / 12 minute walk
- Rainbow House 0.5 mile / 12 minute walk

The location of this site will contribute to the proliferation / concentration of existing food outlets selling predominantly food and drinks high in fat, salt and sugar.

4. Health challenges

Within the [Flintshire and Wrexham Public Services Board Wellbeing Plan](#)^{ix} there is a commitment to developing a programme to make sure that good quality and healthy food is affordable and accessible.

This application is within Grosvenor 2 Lower Super Output Area (LSOA).

According to the 2019 Welsh Index of Deprivation this ward is ranked number 430 out of 1,909 local areas in Wales.

i. Children and young people

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, sugar and salt by the time they get to secondary school.

Data from the Child Measurement Programme^x 2021 – 2022 shows that

- Within Wrexham County Borough over a quarter (27%) of children aged 4-5 years are living with overweight or obesity

In addition to overweight and obesity data, data produced by Public Health Wales Observatory, using School Health Research Network (SHRN)^{xi} data shows that:

- Only 39% of 11-16 year olds in Wrexham County Borough reported eating at least one portion of fruit or vegetables per day. This is lower than both the BCUHB average (44.2%) and the Wales average (44.8%)
- Nearly a fifth (18.6%) of 11-16 year olds in Wrexham County Borough reported consuming at least one soft drink daily. This is higher than the BCUHB average (17.2%) and the Wales average (16.4%).

ii. Adults

Data from the Public Health Wales Observatory for 2021 – 2022 shows that in Wrexham 60% of adults are living with overweight or obesity^{xii} compared to 59% across the Betsi Cadwaladr University Health Board area.

5. Encouraging healthier options

Whilst we have outlined concerns in our response there are small changes and nudges that could be made to the menu that would encourage and provide healthier food and drink options. These include:

- A menu with a reduced selection of high fat, salt and sugary food and drinks, providing healthy alternatives that are fresh and affordable.
- Ensuring there is a good selection of affordable fruit and vegetable options.
- Ensuring access to tap water and offering water bottle refills.
- Include options to suit dietary requirements and preferences.

These healthier options would enable a new restaurant to safely contribute to economic prosperity in the area, which independently helps to improve population health.

6. Summary of recommendations

In summary, BCUHB Public Health Team have the following concerns and suggestions:

- Proximity to a number of educational settings (less than 1 mile / 20 minute walk)
- Proximity to existing takeaways / restaurants / shops selling predominantly food and drinks high in fat, salt and sugar and the high concentration of such food outlets
- Health challenges within the local area related to obesity and overweight for children, young people and adults
- Consider a reduced selection of high fat, salt and sugary food and drinks, providing healthy alternatives that are fresh and affordable.
- Consider a good selection of affordable fruit and vegetable options.
- Consider access to free tap water and the provision of free water bottle refills.
- Consider options to suit dietary requirements and preferences.

7. References

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

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

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

^{iv} National Institute for Health and Care Excellence. [Cardiovascular disease prevention \(nice.org.uk\)](#)

^v Welsh Government. [obesity-pathway.pdf \(gov.wales\)](#)

^{vi} Sustain. Hot Food Takeaways: Planning a route to healthier communities https://www.sustainweb.org/secure/Hot_food_takeaways.pdf

^{vii} [Public Health England. The Eatwell Guide \(publishing.service.gov.uk\)](#)

^{viii} [Local Planning Guidance Note No 9 - Hot Food Take-Aways \(wrexham.gov.uk\)](#)

^{ix} [Flintshire and Wrexham Public Services Board - Our Well-Being Plan 2023-2028 \(wrexhampsb.org\)](#)

^x [phw.nhs.wales/services-and-teams/child-measurement-programme/cmp-2021-2022/child-measurement-programme-annual-report-2021-2022/](#)

^{xi} [Children's Health & Wellbeing Dashboard \(shinyapps.io\)](#)

^{xii} <https://statswales.gov.wales/Catalogue/National-Survey-for-Wales/Population-Health/Adult-Lifestyles/adultlifestyles-by-healthboard-from-202021>