

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

|                           |                                                                |
|---------------------------|----------------------------------------------------------------|
| <b>Application number</b> | P/2023/0715                                                    |
| <b>Location</b>           | Aqueduct Garage, Llangollen Road, Trevor, Llangollen, LL20 7TF |
| <b>Proposal</b>           | Change of use from a retail unit to a fast food takeaway       |

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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 expenditure<sup>i</sup>.

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 to consider 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)<sup>ii</sup> 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](#)<sup>iii</sup>, 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.

Place-making and designing-in community health and well-being is one of the five themes in the Healthier Wales goal of the Well-being of Future Generations Act.

- “Planning can ensure that making the healthy choice is the easiest option, but for this to happen, health needs to be an intrinsic, central consideration in the planning process”.

### 1.3 National Institute for Health and Care Excellence

The National Institute for Health and Care Excellence (NICE) [Cardiovascular disease prevention](#)<sup>iv</sup>, and the [All Wales Obesity Pathway](#)<sup>v</sup> 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](#)<sup>vi</sup> 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](#)<sup>vii</sup> (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)<sup>viii</sup> provides the framework and requirements for Hot Food Take-Aways.

### **2.2 Location: proximity to education settings**

This proposed application sits on Llangollen Road, Trevor, Llangollen, LL20 7TF and is less than a mile / 20 minute walk from the following Primary Schools:

- Garth County Community Primary School, Llangollen LL20 7UY 0.7 miles / 15 min walk
- Ysgol Acrefair, Tower View, Llangollen Rd, Acrefair, Wrexham LL14 3SH 0.7miles / 15 min walk

Although we recognise this is not within 400 metres of a school and pupils in primary education are not allowed out of school premises during the day, research indicates that the most popular time for purchasing food from shops is after school. The proposed operating hours of the establishment are unclear in the application, but consideration should be given to limiting the operating hours to outside of the school operating hours to reduce the likelihood of families accessing food high in fat, salt and sugar at the end of the school day.

### **2.3 Location: proximity to existing hot food takeaways, restaurants and / or 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 takeaway unit, this would still be one additional takeaway than what is currently available and it is this cumulative impact that is of concern. The ambition is to create an environment where communities have access to healthy and affordable food rather than developing one which encourages access to foods high in fat, salt and sugar.

The proposed application site is located on Llangollen Road, Trevor, Llangollen, LL20 7TF. A search on Google Maps (20 November 2023) shows the following eating establishments located close to the proposed site (within half a mile of the application):

- Aussie Rooster, Llangollen Road, Trevor LL20 7TG 0.1 mile / 3 minute walk
- Pontcysyllte Chapel Tea Room, Bryn Seion Chapel, Station Rd, Trevor Llangollen LL20 7TP 0.3 mile / 7 minute walk
- Trevor Convenience Store, 3 Heol Penderyst, Trevor, Llangollen LL20 7UD 0.3 mile / 7 minute walk
- Telford Inn, Station Road, Trevor LL20 7TT 0.5 mile / 10 minute walk

## **2.4 Flintshire and Wrexham Public Services Board Wellbeing Plan**

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

### **2.4 Health challenges**

This application is within Llangollen Rural Lower Super Output Area (LSOA). According to the 2019 Welsh Index of Deprivation this ward is ranked number 1337 out of 1,909 local areas in Wales.<sup>x</sup>

#### **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<sup>xi</sup> 2020 – 2021 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)<sup>xii</sup> 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<sup>xiii</sup> compared to 59% across the Betsi Cadwaladr University Health Board area.

### **3. Encouraging healthier options**

Whilst we have concerns in our response with regards to the health challenges within the area, there are small changes and nudges that could be made to the menu that would encourage healthy choices 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 free tap water and the provision of free water bottle refills.
- Options to suit dietary requirements and preferences.

#### 4. Summary of recommendations

In summary, the BCUHB Public Health Team have concerns specifically in relation to the health challenges within the local area related to obesity and overweight for children, young people and adults.

Our recommendations are:

- Consider restricting the operating hours of the premises to reduce the likelihood of families walking home from school being exposed to increased opportunities to purchase food high in fat, salt and sugar
- 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.

#### 5. References

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<sup>i</sup> Tackling Obesity: Future Choices – Obesogenic Environments – Evidence Review. [07-735-obesogenic-environments-review.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/438887/07-735-obesogenic-environments-review.pdf) ([publishing.service.gov.uk](https://publishing.service.gov.uk))

<sup>ii</sup> [https://www.gov.wales/sites/default/files/publications/2019-10/healthy-weight-healthy-wales\\_0.pdf](https://www.gov.wales/sites/default/files/publications/2019-10/healthy-weight-healthy-wales_0.pdf)

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

<sup>iv</sup> National Institute for Health and Care Excellence. [Cardiovascular disease prevention](https://www.nice.org.uk/guidance/CG146) ([nice.org.uk](https://www.nice.org.uk))

<sup>v</sup> Welsh Government. [obesity-pathway.pdf](https://www.gov.wales/government/publications/obesity-pathway.pdf) ([gov.wales](https://www.gov.wales))

<sup>vi</sup> Sustain. Hot Food Takeaways: Planning a route to healthier communities [https://www.sustainweb.org/secure/Hot\\_food\\_takeaways.pdf](https://www.sustainweb.org/secure/Hot_food_takeaways.pdf)

<sup>vii</sup> [Public Health England. The Eatwell Guide](#) ([publishing.service.gov.uk](https://publishing.service.gov.uk))

<sup>viii</sup> [Local Planning Guidance Note No 9 - Hot Food Take-Aways](#) ([wrexham.gov.uk](https://www.wrexham.gov.uk))

<sup>ix</sup> [Flintshire and Wrexham Public Services Board - Our Well-Being Plan 2023-2028](#) ([wrexhampsb.org](https://www.wrexhampsb.org))

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<sup>x</sup> [WIMD - Llangollen Rural \(gov.wales\)](#)

<sup>xi</sup> [phw.nhs.wales/services-and-teams/child-measurement-programme/cmp-2021-2022/child-measurement-programme-annual-report-2021-2022/](#)

<sup>xii</sup> [Children's Health & Wellbeing Dashboard \(shinyapps.io\)](#)

<sup>xiii</sup> [https://statswales.gov.wales/Catalogue/National-Survey-for-Wales/Population-Health/Adult-Lifestyles/adultlifestyles-by-healthboard-from-202021](#)