

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:-

Application number	P/2023/0685
Location	Butchers Shop, Mountain Road, Rhosllanerchrugog, Wrexham, LL14 2LG
Proposal	Change of current use of A1 (Shop) to A3 (Food and drink), external makeup and building itself is not changing

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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 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)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.

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](#)^{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. Within this guidance note it states that new hot food takeaways should not be located in:

- Wrexham town centre (principal shopping streets) if they are detrimental to the character, vitality or viability of the area;
- predominantly residential areas;
- within 400 metres of the boundary of a school or tertiary college.

This proposed application goes against two of the three points stated above.

It is located within a predominantly residential area surrounded by the following residential streets:

- Hall Street
- Llwyn Einion Road
- Maes Enion
- Pentredwr
- Mountain Street
- Llwydiarth

Additionally the application site is within 400 metres of two school boundaries:

- 0.2 miles / 4 minute walk from Ysgol Maes Y Mynydd (primary school),
- 0.2 miles / 5 minute walk from Ysgol Y Grango (secondary school),
- The Local Planning Guidance Note No. 9 states that food outlets in close proximity to and surrounding schools can provide an added incentive and temptation to children to over-consume fast food. Most fast food takeaways are a source of cheap, energy dense and nutrient poor foods. Research indicates that children attending schools near fast food outlets are more likely to be obese than those whose schools are more inaccessible to such outlets.

The Local Planning Guidance Note No. 9 further goes on to state that in the County Borough nearly 60% of schools are located near to hot food takeaway outlets. Having additional outlets close to schools would negate efforts by the Council and its partners in supporting the Healthy Schools Programme to ensure that young people have access to healthy options. Whilst pupils in primary education are not allowed out of school premises during the school day, research indicates that the most popular time for purchasing food from shops is after school.

The proposed application/site will have opening hours from 12:00 to 20:00 (Wednesday, Thursday and Friday) therefore the proximity of the proposed development to the Primary and Secondary Schools is concerning both from a lunchtime and end of school day perspective. This is in terms of the provision and availability of unhealthy foods to children and young people.

Therefore due to its location in a predominantly residential area, and within 400m boundary of two schools, this is not an appropriate site for this application.

2.2 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.

This proposed application sits on Mountain Road, Rhosllanerchrugog, Wrexham, LL14 2LG and a number of hot food takeaways / restaurants 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 (14 November 2023) highlights the concentration of such eating establishments nearby. The following are shown to be located close to the proposed site:

- Good Fortune Chinese Takeaway 0.2 miles / 5 minute walk
- SPAR Rhos 0.2 miles / 5 minute walk
- Rhos Kebab & Pizza House 0.3 miles / 6 minute walk
- Rhos Caffi & Sandwich Bar 0.3 miles / 6 minute walk
- Stevie's Fast Food 0.3 miles / 6 minute walk
- Gerrards Confectioners Ltd 0.3 miles / 7 minute walk
- Premier Rhosllanerchrugog 0.3 miles / 7 minute walk
- The Bamboo Takeaway 0.4 miles / 8 minute walk
- Oriental Tandoori 0.4 miles / 9 minute walk

The location of this site is not appropriate for this application due to the proliferation / concentration of existing hot food takeaways / restaurants selling predominantly food and drinks high in fat, salt and sugar as listed above.

2.3 Flintshire and Wrexham Public Services Board Wellbeing Plan

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.

2.4 Health challenges

This application is within Ponciau 3 Lower Super Output Area (LSOA), Rhosllanerchrugog, Wrexham. According to the 2019 Welsh Index of Deprivation this ward is ranked number 893 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 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)^{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.

3. Summary of recommendations

In summary, due to the concerns raised in the above response the BCUHB Public Health Team would not be supportive of this application.

Our concerns are specifically in relation to the location of the site with the following concerns:

- Proximity to two educational settings (within 400 metre boundary of a primary and secondary school) and in a predominantly residential area – going against the Local Planning Guidance Note No 9.
- Proximity to existing takeaways / restaurants / shops selling predominantly food and drinks high in fat, salt and sugar and the high concentration of such food outlet
- Health challenges within the local area related to obesity and overweight for children, young people and adults

4. References

- ⁱ Tackling Obesity: Future Choices – Obesogenic Environments – Evidence Review. [07-735-obesogenic-environments-review.pdf \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/407735/obesogenic-environments-review.pdf)
- 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 \(nice.org.uk\)](https://www.nice.org.uk/guidance/ng117)
- ^v Welsh Government. [obesity-pathway.pdf \(gov.wales\)](https://gov.wales/obesity-pathway.pdf)
- ^{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 \(wrexham.gov.uk\)](https://www.wrexham.gov.uk/documents/LocalPlanningGuidanceNoteNo9HotFoodTakeAways)
- ^{ix} [Flintshire and Wrexham Public Services Board - Our Well-Being Plan 2023-2028 \(wrexhampsb.org\)](https://www.flintshire.gov.uk/our-well-being-plan-2023-2028)
- ^x phw.nhs.uk/services-and-teams/child-measurement-programme/cmp-2021-2022/child-measurement-programme-annual-report-2021-2022/
- ^{xi} [Children's Health & Wellbeing Dashboard \(shinyapps.io\)](https://shinyapps.io/childrens-health-wellbeing/)
- ^{xii} <https://stats.wales.gov.wales/Catalogue/National-Survey-for-Wales/Population-Health/Adult-Lifestyles/adultlifestyles-by-healthboard-from-202021>