

Our ref: WT/TR/Q210600
Your ref: P/2023/0155
Email: tim.rainbird@quod.com
Date: 14th June 2023



Ms Holman
Planning Department
Wrexham County Borough Council
16 Lord Street
Wrexham
LL11 1LG

By Email

Dear Ms Holman,

Change of Use from Class A1 to Class A3 (Food and Drink) or Class D2 (Assembly and Leisure) **Unit H, Plas Coch Retail Park, Wrexham, LL11 2BA** **Planning Reference: P/2023/0155**

We write on behalf of our client, EPIC (No.1) Limited (c/o Ediston Real Estate) ('the Applicant'), in respect of the above planning application, validated by Wrexham County Borough Council ('WCBC') on 12th April 2023 under planning application reference P/2023/0155. This letter seeks to respond to the consultation response provided by Public Health on 12th May 2023 and provide further comfort that Unit H will not be occupied by a hot food takeaway/ fast food outlet.

The concerns raised by Public Health relate to the levels of obesity in Wrexham and the ability to control the availability of, or exposure to, unhealthy, inexpensive foods and drinks with high energy densities. The response, attached at **Document 1**, refers to the correlation between diet and health, and the contribution played by fast food outlets. In this context, the Public Health Officer raises the following concerns about the location of the Site:

- The location to a number of educational settings;
- The proximity to an existing hot food takeaway and restaurants selling predominantly food and drinks high in fat, salt, and sugar; and
- The health challenges within the local area related to overweight and obesity.

The Applicant understands WCBC's commitment to reducing obesity and improving health and well-being in the borough. We understand that an individual's health and well-being is strongly influenced by the surrounding environment.

In response to the points raised by the Public Health Officer, we suggest the following condition is imposed on the planning permission should the Local Planning Authority decide to grant consent:

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"The development hereby approved shall at no time be used as a hot food takeaway within Class A3."

The following condition is precise and enforceable, and seeks ensure that Unit H will not be occupied by a hot food takeaway/ fast food outlet. We would welcome your consideration of the condition wording and hope that a restriction of this nature will directly address the concerns raised by Public Health. The Applicant would be prepared to consider additional controls should these be considered necessary and meet the relevant tests in respect of imposing planning conditions.

To sum up, the Applicant has considered the comments received from the Public Health Officer and has constructively proposed that a negatively worded planning condition is imposed on any planning permission to address the concerns raised. The Condition will act as a barrier preventing the use of the unit as a hot food takeaway/ 'fast food' outlet within Class A3 and provides comfort that the proposed development will not exacerbate obesity problems in Wrexham.

In conclusion, with the condition in place, it has been clearly demonstrated that the application represents a sustainable development that satisfies the Development Plan and National Planning Policy. The above should provide significant comfort to Public Health and enable the consultee to withdraw its objection.

We hope that this additional information is of assistance in your understanding of the matters raised. In the meantime, should you wish to discuss any specific matter further, please do not hesitate to contact us.

Yours sincerely,

Tim Rainbird
Senior Director

cc. EPIC (No.1) Limited (c/o Ediston Real Estate)



Document 1

Public Health Consultation Response

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-2023-0155
Location	Unit J, Plas Coch Retail Park, Wrexham, LL11 2BW
Proposal	Change of use of Unit J from Class A1 to Class A3 (Food and Drink) or Class D2 (Assembly and Leisure)

For further information contact:

Ceriann Tunnah

Consultant in Public Health

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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 expenditure¹.

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.

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 Location – proximity to education settings

The location of this site does raise concerns due to the close proximity to a number of educational settings. The proposed site is:

- 0.2 miles from Plas Coch Primary School (4 min walk)
- 0.4 miles from Glyndwr University (8 min walk)
- 0.5 miles from Rhosddu Primary School (9 min walk)
- 0.7 miles from Haulfan Pupil Referral Unit (15 min walk)

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.

This proposed application sits on the Plas Coch Retail Park and there a number of restaurants selling predominantly food and drinks high in fat, salt and sugar already within the retail park.

- Plas Coch Pub
- Costa Coffee drive-thru

A visit to Google maps (02/05/2023) shows a further hot food takeaway within half a mile of the application:

- 0.4 miles Charlie's Kitchen burger van (9 min walk)

4. Health challenges

This application is in Grosvenor 2 Ward. According to the 2019 Welsh Index of Deprivation this ward is ranked number 430th out of 1,909 local areas in Wales.

i. Children and young people

Data from the Child Measurement Programme for Wales, 2018/19 shows that 28.6% of children in Wrexham, aged 4 to 5 years are overweight or obese. This is higher than the Wales average of 26.9%.

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.

ii. Adults

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

5. Encouraging healthier options

Whilst we have outlined concerns in our response with regards to the location of this application due to the proximity to educational settings and existing restaurants selling predominantly food and drinks high in fat, salt and sugar and 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.

6. Summary of recommendations

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

- Location to a number of educational settings (less than 1 mile / 20 minute walk)
- Proximity to existing hot food takeaway and existing restaurants selling predominantly food and drinks high in fat, salt and sugar
- Health challenges within the local area related to overweight and obesity

7. References

ⁱ Tackling Obesities: Future Choices – Obesogenic Environments – Evidence Review. [07-735-obesogenic-environments-review.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/67355/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](https://www.nice.org.uk/guidance/CG184) ([nice.org.uk](https://www.nice.org.uk))

^v Welsh Government. [obesity-pathway.pdf](https://www.gov.wales/government/publications/obesity-pathway.pdf) ([gov.wales](https://www.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 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

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