

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/2023/0298
Location	36 St Georges Crescent, Wrexham, LL13 8DB
Proposal	Change of use from class a1 (fish monger) to class a3 (cafe)

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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. The review found good evidence of more hot food takeaways in deprived areas, and children who spend time in deprived neighbourhoods tending to eat more fast food and having 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

2.2 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:

- 0.5 miles from Coleg Cambria (10min walk)
- 0.7 miles from Victoria C.P Primary School (15 min walk)
- 0.8 miles from St Annes Catholic Primary School (16 min walk)

The proximity of the proposed development to the college is concerning both from a lunchtime and college finish time perspective 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 provision business, this would still be one more than what is currently available and it is this cumulative impact that is of concern.

This proposed application sits on St Georges Crescent 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 on 07/06/2023 highlights the concentration of such eating establishments with the following located close to the proposed site:

- 20 feet Subway (1 min walk)
- 98 feet Try Thai Shop and Noodle Bar (1 min walk)
- 292 feet KFC (1 min walk)
- 292 feet Everland Fish Bar (1 min walk)
- 0.2 miles Nandos (4 min walk)
- 0.2 Marmaris Kebab and Pizza (5 min walk)
- 0.2 miles High Street Feeder (3 min walk)
- 0.3 miles Andy's American Diner (5 min walk)
- 0.3 miles Burger King (6 min walk)
- 0.3 miles Starbucks (7 min walk)
- 0.5 miles McDonalds (10 min 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.

4. Health challenges

This application is within the Eagles Meadow retail park, in Smithfield Ward.

According to the 2019 Welsh Index of Deprivation this ward is ranked number 163 out of 1,909 local areas in Wales.

i. Children and young people

Data from the Child Measurement Programme^{viii} 2021/22 shows that in Wrexham, 27% of children aged to 4-5 years old are overweight or obese.

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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^{ix} 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 / shops 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 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.

Summary of recommendations

In summary, our concerns are specifically in relation to the location of the site with the following concerns:

- 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

6. References

ⁱ Tackling Obesities: Future Choices – Obesogenic Environments – Evidence Review. [07-735-obesogenic-environments-review.pdf](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/67355/tackling-obesities-future-choices-obesogenic-environments-evidence-review.pdf) ([publishing.service.gov.uk](https://www.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](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 phw.nhs.wales/services-and-teams/child-measurement-programme/cmp-2021-2022/child-measurement-programme-annual-report-2021-2022/

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