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City of Rockingham  
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### **Submission on proposal to amend the Parkland Heights Neighbourhood Centre Local Development Plan (LDP).**

Cancer Council Western Australia (Cancer Council WA) takes the opportunity to comment on the above proposal and urges the City of Rockingham to reject aspects of the amended Local Development Plan.

Cancer Council WA is a non-government, not-for-profit cancer organisation that has no religious or political affiliations. Cancer Council WA has been involved in the governance and distribution of peer-reviewed cancer research funding, patient support, cancer prevention, and advocacy in Western Australia (WA) for 60 years. Cancer Council WA is a leading and active member of the cancer community, which comprises people affected by cancer, whether through a personal diagnosis or as family members, carers or health professionals.

#### **The application**

To our understanding, the original Local Development Plan (LDP) for Parkland Heights Neighbourhood Centre was approved by the City of Rockingham on 6 September 2019, situated centrally within the Parkland Heights estate, which when complete is expected to be home to around 1,200 families.

A vision for the neighbourhood centre described on the Parkland Heights' website is "a centre an easy stroll from anywhere within the development". Families understandably would be drawn to the appeal of a vibrant, connected community with easy access to obtain groceries and support local retailers, including restaurants and cafes where they can connect with friends and neighbours.

Of concern is the inclusion of two drive-through fast-food outlet pad sites in the amended LDP with tenants to be determined, whilst the original LDP had no drive-through fast-food outlets.

Cancer Council WA submission to the City of Rockingham is that the amendment to include two fast-food outlet drive-through sites is incompatible with a centrally located, neighbourhood centre within a residential housing estate, will have a detrimental impact to public health and is not in line with community expectations.

#### **Our interest in this application**

Body weight, poor diet and cancer

Overweight and obesity is second only to tobacco use contributing the most burden of preventable total death and disease in Australia<sup>1</sup> and there is a clear link to poor diets and having higher body

weight with increased risk of heart disease, stroke, type 2 diabetes and 13 types of cancers<sup>ii</sup>. Recent research commissioned by Cancer Council Australia and published in the International Journal of Cancer modelled that over the 25 years (2017-2037), 190,500 cancer cases could be avoided if all Australian adults achieved and maintained a healthy weight<sup>iii</sup>.

Overweight and obesity is the leading risk factor attributed to national health system spending at \$4.3 billion, and \$1.2 billion can be attributed to combined dietary risk factors<sup>iv</sup>. In WA, the cost of illness from overweight and obesity to WA hospitals is predicted to rise by 80 per cent to \$610.1 million in 2026 if increases to overweight and obesity continue<sup>v</sup>.

In response, Australian Governments across jurisdictions have identified and prioritised strategies to create supportive, sustainable and healthy environments that will enable and promote health and wellbeing, including the consumption of healthy food and less consumption of unhealthy food<sup>vi</sup>. There is consensus that a collaborative, systems approach is required to address the underlying mechanisms that translate to Western Australian's poor dietary intake, and a necessary component will be simultaneously utilising several leverage points to address the ubiquitous supply and marketing of energy dense, nutrient-poor and ultra-processed foods<sup>vii</sup>.

Cancer Council WA has a proud history of advocating for supportive environments that protect and enable health and wellbeing and delivering programs that support people to eat well, be physically active and maintain a healthy body weight. This includes the development of government policies which will create healthier environments, such as the reduction in the proliferation of fast-food outlets (especially near schools and homes) and restricting the marketing of unhealthy food and drinks to children on government property.

#### Public health impact of fast-food outlets

Fast-food outlets sell oversized, overly processed food, packed full of cheap ingredients including salt, added sugar and saturated fat which is bad for our community's health. Fast-food outlets are the most common food outlet frequented by Australians for food prepared outside the home with one-third of Western Australian adults consuming fast-food at least once a week<sup>viii</sup>.

Exposure to fast-food outlets and their advertising is like never before. Just including the top five fast food outlets, \$28 million is spent each year to advertise in Western Australia not including the amount spent on sponsorship deals and digital/online advertising. Their advertisements are wallpaper in our children's lives and cover the buses and bus stops they see on their way to school, on their favourite sport teams jerseys, on social media when they connect with friends, and their outlets are prolific as they go about their lives; in prominent locations targeting certain suburbs and around schools.

The Telethon Kids Institute recently found that the availability of fast-food outlets within the Perth metropolitan area is greater in areas of relative greater disadvantage<sup>ix</sup> where there are twice as many fast-food outlets in the most disadvantaged suburbs of Perth compared to the more advantaged. It is known that lower socio-economic households are more likely to frequently purchase fast-foods<sup>x</sup> and consume takeaway more frequently, compared to their higher socio-economic counterparts<sup>xi</sup>. Moreover, the combination of low socio-economic status, and high fast-food outlet exposure has been

shown to increase the odds of developing obesity<sup>xii</sup>. Thus, the increased proliferation of fast-food outlets in areas of disadvantage could further aggravate health inequalities.

Evidence has demonstrated the location and geographical access to food within a community influences individuals' diet. This is verified by Western Australian data that found Perth residents who moved house and re-located to an area with more unhealthy-food outlets (e.g., fast-food outlets) and fewer unhealthy-food outlets (e.g., supermarkets and greengrocers) experienced significant decreases in fruit and vegetable intake and decreases in overall diet quality<sup>xiii</sup>.

Perth schools are surrounded by fast-food outlets. Perth primary schools on average have two fast-food outlets within only 400m and seven within 1km<sup>xiv</sup>. Secondary schools are higher, with three fast-food outlets within only 400m and 13 fast-food outlets within 1km. It is unsurprising then that Perth research has found that almost 50 per cent of secondary school students frequent fast-food outlets near their schools to purchase unhealthy food on a weekly basis, and it more likely when the fast-food outlets are the most common chain outlets (McDonalds, KFC, Hungry Jacks, Subway).

### **Our Submission**

Local access to affordable, healthy food is an essential part of living in well-connected and vibrant communities that aim to deliver improved public health and excellent quality of life. The co-location of fast-food outlets within neighbourhood centres, next to schools, community infrastructure and within housing estates undermines community's aspirations to live in sustainable communities that support and protect their health and quality of life.

The proposal to amend the Parkland Heights Neighbourhood Centre to invite two drive-through fast food outlets is an incompatible land-use within the existing vision and aspirations of the Parklands Heights estate and overall objectives of the City of Rockingham's Town Planning Scheme No.2, with regard to the detrimental impact on public health and against community expectation and aspirations.

Cancer Council WA rejects point number 5 of the planning report- Inclusion of two fast-food drive-through pad sites - and the supporting documentation to justify them. Drive-through fast-food outlets are not a necessary component of activity centres or neighbourhood centres.

The proliferation of fast-food outlets is contributing to the development of food swamps where the density and number of unhealthy food outlets outnumber access to outlets providing healthier options. There is an inequitable distribution of the severity and impact of food swamps with higher numbers of fast-food outlets in more disadvantaged communities. There is a potential for the proliferation of fast-food outlets within the City of Rockingham, particularly in Baldivis as a sought-after location for families to live. We note that a McDonalds was approved on 21 October 2021, just 250m away from Baldivis Primary School (MOJDAP/133), as well as a potential for a future drive-through fast food outlet in a neighbourhood shopping centre adjacent to this approved McDonalds on Lot 9005 Nairn Drive, Baldivis (MOJDAP/128).

This neighbourhood centre is located centrally within a housing estate which has been designed to facilitate a connected and active lifestyle where community can access the neighbourhood centre

from a stroll away. Inviting drive-through fast-food outlets into neighbourhood residential neighbourhoods and next to child orientated venues such as schools and community infrastructure reinforces and strengthens the interconnected mechanisms that influence eating their products to the detriment of community health.

The Pine View Primary School is immediately opposite the proposed fast-food outlets sites, and the neighbourhood centre is expected to facilitate movement from within Parkland Heights estate to commute roads servicing other schools in the area including Tranby College on Arpenteur Dr and Mother Teresa Catholic College.

Fast-food outlets next to homes and schools is against community expectations. Recent planning applications for drive-through fast-food outlets when subject to community consultations received hundreds of objections from surrounding residents. New drive-through fast-food outlets in Albany, Ellenbrook, Canning Vale and Alkimos demonstrate that communities do not want new drive-through fast-food outlets. Cancer Council WA has representative samples of the Western Australian population and 79 per cent are in favour of a policy requiring local governments to consider the health of their communities when deciding whether a new unhealthy food outlet should be approved, for example if the proposed outlet is close to a school.

### **Conclusion and recommendations**

Cancer Council WA objects to the unnecessary proliferation of fast-food outlets in proximity to homes, schools and children's community infrastructure. Inviting the development of drive-through fast-food outlets in such close proximity to residential homes undermines parent, community and public health agencies which are trying to support communities to engage in health promoting behaviours.

We are cognisant of the inherent failure of the planning laws to address community health concerns. There is no legal obligation to consider planning applications and local development plans in a way which takes account of important associated health, education and local community interests. Nonetheless we submit that the deficits of the planning framework should not prevent decision-makers within the City of Rockingham from taking a holistic approach to the design of neighbourhood centres. Indeed, we suggest that it is the moral responsibility of these decision-makers to ensure that community interests, particularly those of the health and well-being of the local population, are promoted and prioritised. The process of decision-making inherently involves balancing a combination of interests, in order to arrive at a decision that gives appropriate weight to these interests.

While the interests of commercial developers feature in this process, the evidence which we have provided clearly demonstrates drive-through fast-food outlets are not a necessary component of this neighbourhood centre. In this case, commercial economic interests cannot be promoted over the promotion of population health goals, and the design of vibrant, connected communities that provide sustainable and healthy environments for current and future families to live, play, connect and age.

In fact, proliferation of such developments represents a very real risk to the current and future health interests of the community, particularly the children of this community. Recent planning decisions by other local governments have shown a willingness to have regard to the interests of the community

in, for example, avoiding an increase in crime rates associated with a proposed commercial development. We propose a process which gives due weight to the very real risks to the community posed by the approval of LDP, and ultimately conclude that these interests outweigh any benefit which might be gained by increasing the number of fast-food outlets.

We therefore urge the City of Rockingham to exercise its discretion to refuse the LDP amendments for the inclusion of two drive-through fast food outlets as it would likely have an adverse impact on the health of the community, its character and amenity and it against community expectations of living in a residential estate.

Kind regards,

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<sup>i</sup> Australian Institute of Health and Welfare 2019. Australian Burden of Disease Study: impact and causes of illness and death in Australia 2015. Australian Burden of Disease series no. 19. Cat. no. BOD 22. Canberra: AIHW

<sup>ii</sup> Australian Institute of Health and Welfare 2019. Australian Burden of Disease Study: impact and causes of illness and death in Australia 2015. Australian Burden of Disease series no. 19. Cat. no. BOD 22. Canberra: AIHW

<sup>iii</sup> Wilson, L. F., Baade, P. D., Green, A. C., Jordan, S. J., Kendall, B. J., Neale, R. E., Olsen, C. M., Youlten, D. R., Webb, P. M. and Whiteman, D. C. (2019), The impact of changing the prevalence of overweight/obesity and physical inactivity in Australia: An estimate of the proportion of potentially avoidable cancers 2013–2037. *Int. J. Cancer*, 144: 2088-2098. doi:[10.1002/ijc.319](https://doi.org/10.1002/ijc.319)

<sup>iv</sup> Australian Institute of Health and Welfare. (2022). Health system spending per case of disease and for certain risk factors.

<sup>v</sup> Beswick AZ, Ambrosini GL, Radomiljac A, Tomlin S, Chapman AM, Maticевич J, Winstanley M, Kirkland L. The burden and cost of excess body mass in Western Australian adults and children. *Perth, Western Australian Department of Health; 2020*

<sup>vi</sup> National Obesity Strategy.

<sup>vii</sup> Sawyer, A et al 2021, Dynamics of the complex food environments underlying dietary intake in low-income groups: a systems map of associations extracted from a systematic umbrella literature review. *International Journal of Behavioural Nutrition and Physical Activity*.

<sup>viii</sup> <https://ww2.health.wa.gov.au/~media/Corp/Documents/Reports-and-publications/Population-surveys/Health-and-Wellbeing-of-Adults-in-WA-2020.pdf>.

<sup>ix</sup> Trapp G & Hooper P. 2020. Junk-food filled neighbourhoods: building an evidence base for change. Telethon Kids Institute, Centre for Child Health Research, The University of Western Australia.

<sup>x</sup> Burns C, Bentley R, Thornton L, Kavanagh A. Associations between the purchase of healthy and fast foods and restrictions to food access: a cross-sectional study in Melbourne, Australia. *Public health nutrition*. 2015; 18 (1): 143-150.

<sup>xi</sup> Miura K, Giskes K, Turrell G. Socio-economic differences in takeaway food consumption among adults. *Public health nutrition*. 2012; 15 (2): 218-226.

<sup>xii</sup> Burgoine T, Forouhi NG, Griffin SJ, Brage S, Wareham NJ, Monsivais P. Does neighborhood fast-food outlet exposure amplify inequalities in diet and obesity? A cross-sectional study. *The American journal of clinical nutrition*. 2016; 103 (6): 1540-1547.

<sup>xiii</sup> Bivoltsis, A., Trapp, G., Knuiman, M., Hooper, P., & Ambrosini, G. L. (2020). The influence of the local food environment on diet following residential relocation: longitudinal results from RESidential Environments (RESIDE). *Public health nutrition*, 23(12), 2132-2144.

<sup>xiv</sup> Trapp G & Hooper P. 2020. Junk-food filled neighbourhoods: building an evidence base for change. Telethon Kids Institute, Centre for Child Health Research, The University of Western Australia.