

20 February 2024

To whom it may concern



Submission to Development Application – Proposed Commercial Development, 9501L Gaebler Road Hammond Park

Development application number: DAP23/004

Fast-food outlets sell oversized, overly processed food, packed full of cheap ingredients including salt, added sugar and saturated fat which can lead to a variety of health problems. They regularly advertise directly to children, such as cheap \$1 slushies in lolly flavours on the sides of bus-stops and school buses and partner with brands which appeal to children, such as UNO® and Starburst®.

The proposed fast-food outlets includes a drive-through Starbucks, a drive-through McDonald's operating 24/7 and a drive-through KFC operating 24/7. The site is directly opposite Hammond Park Primary School, 1km from Hammond Park Catholic Primary School and 1.3 km from Hammond Park Secondary College. There are childcare centres within a 700m radius including Great Beginnings Hammond Park and Childcare and Early Learning Centre.

The location of the site will lead to repeated exposure and accessibility to unhealthy food by families and children, particularly school children who use public transport as their main method of transport to and from school.

Our interest in the application

Cancer Council WA objects to the land use for drive-through fast-food outlets in circumstances where they pose significant risk to community and public health. This is in areas where there would be significant impact to the quality of the existing food environment such as further proliferation of high density fast-food outlets in neighbourhoods, and where proposed developments are in close proximity to homes, schools and children's community infrastructure.

The proposal for three drive-through fast-food outlets in Hammond Park poses significant risk to public health and community, particularly children due to its proximity to homes, schools and childcare facilities.

Cancer Council Western Australia (Cancer Council WA) welcomes the opportunity to comment on the above proposal and urges the City of Cockburn to refuse the fast-food outlet land-use component of this development application.

As the peak non-government cancer control organisation in Western Australia, Cancer Council WA advises government and other bodies on practices and policies to help prevent, detect and treat cancer. We develop, promote and contribute to policy and initiatives to reduce the incidence and impact of cancer on the Australian community.

Evidence to support our submission

Poor diets and living with overweight and obesity are priority public health issues in Western Australia¹, requiring collective efforts across community organisations and Government at all levels. Western

Australian Local Governments are increasingly taking actions to assist their community to live in the best possible health by implementing strategies to assist community to eat well and be physically active. This is part of creating healthy, connected communities and responding to the principles and objectives of the Public Health Act 2016 under the administration of WA Local Governments.

Currently, living with overweight and obesity and poor diets are second and third respectively to tobacco use in contributing the most burden of preventable death and disease in Australiaⁱⁱ 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 cancerⁱⁱⁱ. 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^{iv}.

The location and density of fast-food outlets is contributing to poor diets and having overweight and obesity as a result of their pervasive availability, accessibility and marketing^v. The Western Australian Department of Health has reviewed the evidence regarding food, built environments and obesity and consequently recommended that planning laws and frameworks are utilised and amended to limit unhealthy food outlets and support access to healthy food outlets, including near schools^{vi}.

Perth neighbourhoods are experiencing 'food swamps'; a term describing an area where the density and number of unhealthy food outlets outnumber access to outlets providing healthier options. Dr Gina Trapp and colleagues are at the forefront of research regarding communities' geographical access to food and its influence on diet. Her research verified that geographical access to food within a community influences individuals' diet.

Dr Trapp and her team have mapped all fast-food outlets within the Perth metropolitan area in relation to area level disadvantage and proximity to schools. They found that there are twice as many fast-food outlets in the most disadvantaged suburbs of Perth compared to the more advantaged^{vii}.

They also found Perth schools were surrounded by fast-food outlets. Perth primary schools on average have two fast-food outlets within 400m and seven within 1km^{viii}. Secondary schools are higher, with three fast-food outlets within 400m and 13 fast-food outlets within 1km.

WA 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's more likely when the fast-food outlets are the most common chain outlets (i.e. McDonald's, KFC, Hungry Jacks, Subway).

Fast-food outlets are the most common food outlet frequented by Australians for food prepared outside the home with over half (55 per cent) of WA adults consuming fast-food once a week or more^{ix}. We know that lower socio-economic households are more likely to frequently purchase fast-foods^x and consume takeaway more frequently, compared to their higher socio-economic counterparts^{xi}. Moreover, the combination of low socio-economic status, and high fast-food outlet exposure has been shown to increase the odds of developing obesity^{xii}. Thus, the increased proliferation of fast-food outlets in areas of disadvantage could further aggravate health inequalities.

Cancer Council WA commends the City of Cockburn for their Strategic Community Plan 2020-2030 which outlined a '*vibrant, healthy, safe, inclusive and connected community*' as one of your strategic objectives. The development of three new fast-food outlets will undermine this objective as it is crucial that families and children can live, work, play and learn in neighbourhoods that encourage and facilitate healthy behaviours.

The WA Food Atlas team led by Dr Gina Trapp at Edith Cowan University is mapping food retail and food service outlets in all Perth metropolitan Local Governments^{xiii}. The results for the City of Cockburn demonstrate that over 50 per cent of food services are fast-food which is above average when compared with the rest of Perth. This is particularly concerning given the South Metropolitan Health Services (WA) City of Cockburn Health and Wellbeing Profile Report which demonstrated that 32.9 per cent of adult residents eat fast food weekly, and 71.7 per cent of residents are living with overweight and obesity^{xiv}.

In December 2023, the City of Cockburn approved an application for the Hammond Park Neighbourhood Centre which included two drive through fast-food outlets. If this application for three new fast-food outlets is approved, there will be a total of five fast-food outlet developments within a 1km radius. The proliferation of unhealthy food outlets is a serious concern that will influence the nutrition and diets of residents including families and children for many years to come.

Grounds to object

Cancer Council WA is aware of the inherent failure of Western Australia's planning laws to address community health concerns. While there is no legal obligation to consider community health and local interests, Cancer Council WA is determined to ensure decision makers within the City of Cockburn adopt a people centred approach to the design of communities. The process of decision-making naturally involves balancing a combination of interests, to arrive at a decision that gives appropriate weight to these interests. Cancer Council WA is concerned parties with a vested commercial interest may outweigh community interests due to the pressure and influence they may exert.

Cancer Council WA has surveyed 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. As such, the planning process should consider the aspirations of the community to promote spaces and environments that support healthy living.

Conclusion and recommendation

Cancer Council WA supports measures that promote vibrant, liveable neighbourhoods. The health and wellbeing of community must be supported by health promoting environments to prevent behaviours associated with chronic diseases, including cancer.

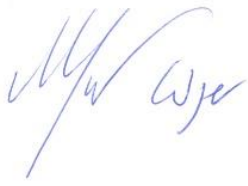
We commend the work Western Australian local governments are already doing to support the health of their residents. Cancer Council WA continues to work with local governments to achieve our vision of a cancer free future for our community. Our guide *Local Governments, public health, and cancer prevention. Taking action to improve the health and wellbeing of our local communities'* provides an introduction to our capacity to work with WA local governments.

Cancer Council WA urges the City of Cockburn to use its discretionary power and reject development application for three drive-through fast-food outlets. Approving the application for drive-through fast-food outlets will undermine the efforts of parents and public health agencies who are trying to support communities to live a healthier life.

In the spirit of deepening relationships, Cancer Council WA acknowledge all the traditional custodians and owners of country throughout Western Australia and recognise their continuing connection to land, waters and community. We also pay our respect to their Elders and extend that respect to all Aboriginal peoples living and working in the City of Cockburn.

If you have any questions about this submission, we welcome further discussion on this issue.

Kind regards



Melissa Ledger

Director, Cancer Prevention and Research

Our partners



Diabetes WA



Telethon Kids Institute



Heart Foundation



Public Health Association Australia – WA Branch



WA School Canteen Association Inc



Australian Health Promotion Association – WA Branch



Public Health Advocacy Institute

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ⁱ State Public Health Plan for WA

ⁱⁱ 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

ⁱⁱⁱ 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

^{iv} Wilson, L. F., Baade, P. D., Green, A. C., Jordan, S. J., Kendall, B. J., Neale, R. E., Olsen, C. M., Youlden, 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)

^v Evidence brief: food, built environments and obesity

^{vi} WA Sustainable Health Review Final Report <https://www.health.wa.gov.au/Improving-WA-Health/Sustainable-health-review-delivery/Final-report>

^{vii} 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.

^{viii} 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.

^{ix} Cancer Council WA Report: Shape of Australia 2022. .

^x 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.

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

^{xii} 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.

^{xiii} Bivoltsis A, Hooper P, Klug F, Thornton L, Pollard C, Pulker C, Cooper M, McStay C, Fallows M, Butcher L, Sartori A, Simonetti J, Trapp G,. 2023. The WA Food Atlas. Telethon Kids Institute, Perth Western Australia.

^{xiv} Government of Western Australia South Metropolitan Health Service. 2023. City of Cockburn Health and Wellbeing Profile; Perth Western Australia.