

1 July 2022

To Whom It May Concern,

Submission on Draft Local Planning Policy 4.24 - Child Minding Centres (SJ3662)

Cancer Council Western Australia (Cancer Council WA) takes the opportunity to comment on the Shire of Serpentine Jarrahdale's draft local planning policy 4.24 – child minding centres.

Cancer Council WA is a leading health promotion charity in Western Australia. Our vision is a cancer-free future for all Western Australians and over the last 60 years, we have strived to achieve this vision through cancer research, advocacy, education, and support. We are highly regarded in the community and work closely with a diverse range of stakeholders to help deliver outstanding, client-centred customer service and health equity throughout our communities.

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 this area.

Our interest in this policy

The Western Australian community and families living in Serpentine Jarrahdale will benefit from living in built environments that support and enable their health and wellbeing. Considerate land-use planning, and supportive built environments are important components of a suite of measures that include programs, policies and safeguards that are required to protect and promote public health and reduce preventable chronic disease.

Most recent burden of disease data show that chronic diseases and injury cause the most burden of disease in Australia. Among the five disease groups contributing the most burden, cancer and cardiovascular disease feature, along with musculoskeletal conditions, mental health conditions & substance use disorders, and injuries (1). It is estimated however that 38 per cent of this disease burden is preventable and the preventable risk factors contributing the most burden are tobacco use, overweight and obesity, poor diet, high blood pressure and alcohol use (1).

Cancer Council WA recognises and values the role Western Australian local governments have in empowering and enabling people to live healthy lives. This is formally recognised in the Public Health Act 2016 (PH Act) and the State Public Health Plan for Western Australia, the former listing healthy eating, physical activity, overweight and obesity, harmful alcohol use and tobacco use as policy priorities for local governments to consider in their public health planning (2).

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Cancer Council WA supports measures that create vibrant, liveable neighbourhoods that facilitate behaviours that prevent chronic disease and address the above policy priorities. The built environment and land use planning significantly influence the extent to which people live with and experience the risk factors described above contributing to the most disease. For example, providing supportive infrastructure for active and public transport and an equitable approach to the location and density of types of food outlets play an important role in meeting physical activity and dietary intake recommendations for preventing chronic disease and overweight and obesity.

Comments on the draft policy

Cancer Council WA supports the draft policy's aims and policy provision standards in regards to location, infrastructure requirements and design that will promote and enable physical activity through active transport and play and make consideration for public health when conducting risk assessments for nearby land uses.

Location – easy walking distance, walkable catchment and serviced by public transport

Cancer Council WA supports the over-arching aim and draft provisions that recommend child minding centres to be within a walkable catchment of the local neighbourhood and activity centres and serviced by public transport. Having town or neighbourhood centres serviced by a diverse range of destinations that are within a walkable catchment, promotes walking by residents and visitors so they can meet a range of needs using active or public transport means.

Location – nearby uses

In regards to the standard that child minding centres are adequately separated from any incompatible nearby uses, Cancer Council WA strongly recommends that the public health risk of outlets that sell alcohol, unhealthy food (convenience stores, service stations and fast-food outlets) and tobacco products are considered incompatible. The harm from consuming their products as well as the practices of the tobacco, alcohol and processed, fast-food industry to pervasively market and extensively make available their products results in a high public health risk when considering their location and density in land use planning.

Cancer Council WA supports that public health considerations form part of the risk assessment of nearby land uses and recommends that the outlets listed above are given weighted and significant consideration for public health risk in regards to their significance in contributing to the leading causes of disease burden and their risk factors in Australia.

Infrastructure Requirements

Cancer Council WA supports the standards for the development to have pedestrian footpaths from the street, as well as the foot path. It is recognised that there are performance-based standards regarding signage to prevent unsafe parking in the draft policy, Cancer Council WA encourages complementary traffic calming measures surrounding child minding centres to ensure that the users of the roads and footbaths travelling via walking, cycling or public transport are given priority in

regards to arriving safely and conveniently. In relationship to this we support the policy aim to provide a site that is service by public transport.

Design

Cancer Council WA supports the stipulation for large enough play areas that enable children to have sufficient area for active play to contribute to meeting their physical activity recommendations. Cancer Council WA recommends that adequate shade is given a priory in design considerations to protect from the harm of UV.

Conclusion

Thank you for the opportunity to comment on the draft policy. Please contact Cancer Council WA via the details below to discuss our submission.

Kind regards,

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References

- 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
- State Public Health Plan for Western Australia: Objectives and Policy Priorities for 2019–2024 Available from: https://ww2.health.wa.gov.au/~/media/Files/Corporate/general-documents/Public-Health-Act/State-public-health-plan/State-PH-Plan-2019-2024/State-Public-Health-Plan-WA.pdf