



Planning for healthy food retail in Victoria

Sustain: The Australian Food Network

5 December 2025

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Key reforms – Victorian Planning Provisions

1. Embed health and food security into planning objectives and planning schemes

- Introduce “**healthy food environments**” and “**food security**” objectives across multiple clauses (e.g. Clause 11 Settlement, Clause 13.07 Amenity and Human Health)
- Recognise “**dignified food security**” as a key planning priority, ensuring equitable access to nutritious food and opportunities for local food growing (e.g. community gardens, edible landscapes)

2. Create controls to restrict density and location of fast-food outlets

- Introduce Establish clear definitions for fast-food and healthy food outlets, informed by best practice frameworks and research
- Require planning permits for all fast-food outlets and limit their density
- Amend zoning regulations to give local governments greater control over fast-food outlets
- Prohibit the opening of fast-food outlets within 500 m of sensitive locations like schools, day care centres, public parks, community centres, neighbourhood houses and health facilities
- Mandate density assessments to prevent clustering of unhealthy food outlets in vulnerable areas
- Ban unhealthy food advertising on public transport infrastructure, following South Australia

3. Introduce a reference to schools and early childhood services in Clause 53.04

- Elaborate on the statement under Decision guidelines regarding whether a location is appropriate for a convenience restaurant or take-away food premises, to have regard to the proximity of the land to non-residential uses and zones, including schools and early childhood services

4. Strengthen policy support for healthy built environments

- Modify objectives and strategies in clauses related to **activity centres, subdivision design, and healthy neighbourhoods** to promote access to fresh food and placemaking for health
- Support local government with dedicated funding for Health Impact Assessments to ensure planning decisions promote public health
- Consult with local governments to co-design planning reforms that reflect on-the-ground realities, health data and community needs
- Reference **Victorian and national health guidelines**, such as the *Healthy Choices Guidelines* and *National Preventive Health Strategy 2021–2030*
- Develop a statewide food outlet classification system to:
 - Incentivise healthy food retailers through streamlined approvals and / or financial support
 - Restrict and / or regulate fast food outlets in areas with poor health indicators or high outlet density

Proposed amendments to the Planning and Environment Act 1987

1. Section 6 – Planning Scheme Provisions

- **Amend Section 6(2)** to explicitly allow planning schemes to regulate or prohibit food outlets based on public health and nutrition

Insert new clause:

“A planning scheme may include provisions that regulate or prohibit the use or development of land for the purpose of food outlets, including, but not limited to fast food outlets, where such regulation is justified by public health or community nutrition objectives.”

2. Sections 47–62 – Permits and Decision-Making

- **Amend Section 60** to require consideration of *public health* and *community nutrition impacts* in permit decisions:

“In deciding on an application for a permit, the responsible authority must consider the public health impacts and community nutrition impacts of the proposed use or development.”

- **Amend Section 62** to allow permit conditions that limit the type, hours, or density of fast-food outlets based on health objectives

3. Sections 4A–4B, 12A – Ministerial Directions and Victorian Planning Provisions

- **Amend the Victorian Planning Provisions** to include overlays or schedules that regulate food outlet density and type
- **Issue a Ministerial Direction** requiring planning authorities to consider health and nutrition impacts in scheme amendments and permit decisions

4. Section 7 – Local Provisions and Municipal Strategic Statements

- **Clarify that local governments have the authority** to include specific controls on fast-food outlets in their local provisions, based on local health and nutrition data

5. Section 173 – Agreements

- **Encourage or require councils** to use **Section 173** Agreements to restrict fast-food outlets in sensitive areas:

“A responsible authority may enter into an agreement under Section 173 to restrict the establishment or operation of food outlets, including fast food outlets, in areas identified as sensitive for public health or community nutrition”

Unhealthy Food Retail and impacts on population health, the environment and the economy

An unhealthy food environment, saturated in fast food

The commercial food system, dominated by a small number of large multinational corporations, has played a major role in the expansion of unhealthy foods and the resulting surge in non-communicable diseases, environmental degradation, rapidly rising greenhouse emissions and biodiversity loss. Many of Victoria's lower income neighbourhoods are experiencing an inundation of multinational fast-food chains. This is particularly evident in emerging growth areas including Geelong, Whittlesea, Ballarat and Bendigo and regional Victoria (see below images and Appendices 2 and 3) (Marzan, 2025; Preiss & Cook, 2025; Thornton, 2016). A number of these unhealthy retail outlets gain a foothold in prime locations, before residents move into these new estates or local healthy food outlets have an opportunity to establish themselves (Preiss & Cook, 2025).

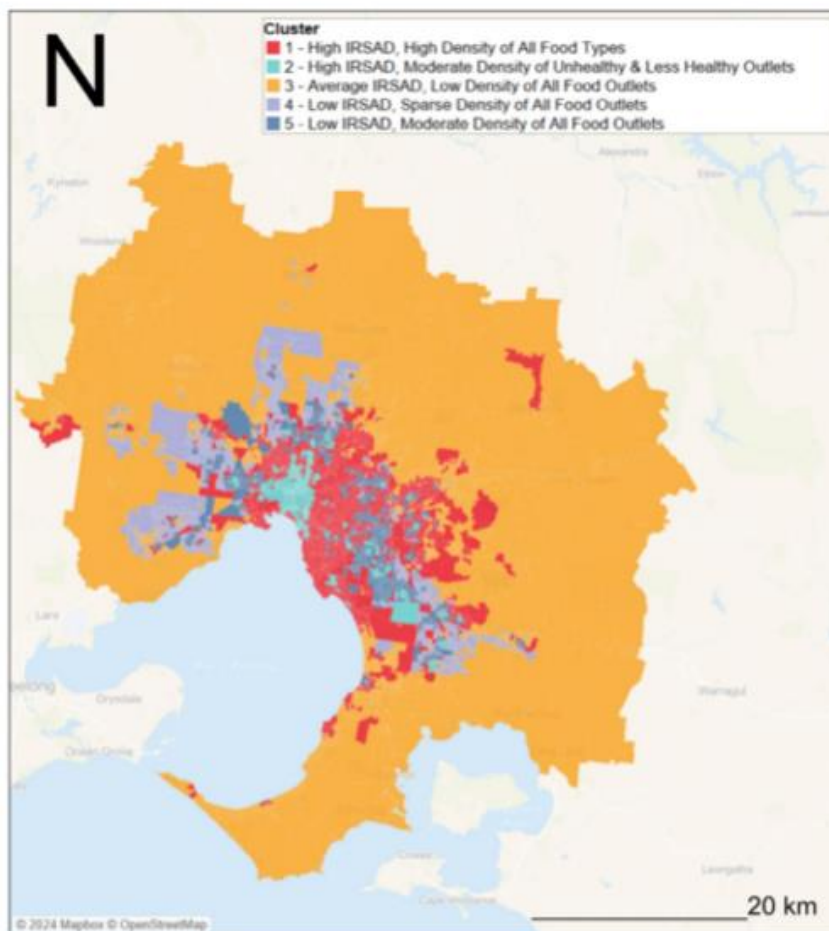


FIGURE 1 | Choropleth map of food environment clusters in Metropolitan Melbourne. **Cluster 1:** High IRSAD (Mean IRSAD: 9.0), high density of all food outlets; **Cluster 2:** High IRSAD (Mean IRSAD: 9.0), very high density of unhealthy and less healthy food outlets; **Cluster 3:** Average IRSAD (Mean IRSAD: 6.0), low density of all food outlets; **Cluster 4:** Low IRSAD (Mean IRSAD: 5.0), sparse density of all food outlets; **Cluster 5:** Low IRSAD (Mean IRSAD: 5.0), moderate density of all food outlets.

Unhealthy foods, particularly those that are classified as processed and ultra processed food (UPFs), saturate supermarket shelves, quick service restaurants (QSRs), and fast-food outlets. For those living in socioeconomically disadvantaged areas within Victoria, this over saturation is significantly higher as are the associated risks of ill health (Thornton, 2016; Marzan, 2025, (Rockström, et al., 2025 p.1641)). Research also indicates that QSRs are positioned nearby primary and secondary schools in the most disadvantaged areas of the state (Thornton, 2016).

These socioeconomically disadvantaged communities are often referred to as *food deserts*; areas with limited access to healthy food and/or *food swamps*; ‘areas with a high density of unhealthy food options relative to healthy options which can contribute to poor dietary habits and health outcomes ...’ (Marzan, 2025, p.2).

These communities:

limited healthy sources

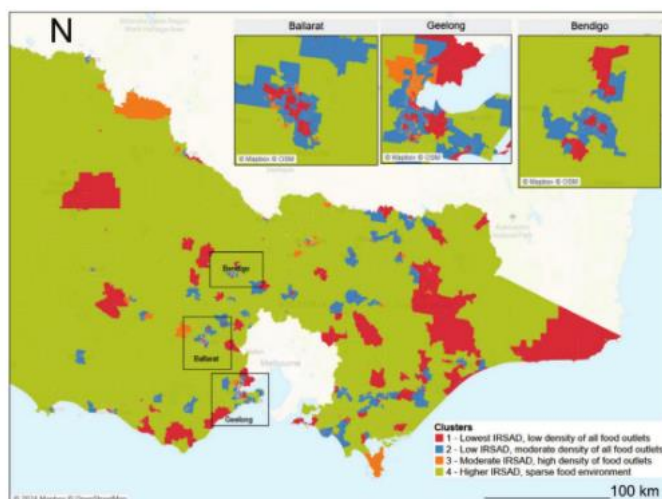


FIGURE 2 | Choropleth map of food environment clusters in Regional Victoria. **Cluster 1:** Lowest IRSAD (Mean IRSAD: 2.0), low density of all food outlets; **Cluster 2:** Low IRSAD (Mean IRSAD: 3.0), moderate density of all food outlets; **Cluster 3:** Moderate IRSAD (Mean IRSAD: 4.0), very high density of unhealthy and less healthy food outlets; **Cluster 4:** Higher IRSAD (Mean IRSAD: 5.0), sparse food environment.

frequently experience access to food while

simultaneously encountering a higher density of unhealthy food outlets. In low-income neighbourhoods, nutritious foods tend to be more expensive and thus less accessible to residents with limited purchasing power...[M]arginalised populations disproportionately face higher risks of diet-related chronic diseases, perpetuating health inequalities (Marzan, et al., 2025, p. 2).

The responsibility for the rapid rise in the burden of chronic, dietary-related disease lies with powerful, commercially driven industries; in effect, the rise in disease is simply the inevitable consequence of commercial food systems working as designed (Baker et al., 2025; Belluz & Hall, 2025).

Fast food outlets, designed for convenience as drive-thru, facilitate ease of access to ultra-processed foods (UPFs). UPFs are cheap, convenient, ready-to-consume and hyper-palatable (Seferidi, et al., 2025). They have been found to encourage overeating given their makeup (Seferidi, et al., 2025; Wood et al., 2025).

The NOVA classification defines UPF's as,

...formulations of ingredients, mostly of exclusive industrial use, that result from a series of industrial processes (Monteiro, 2019, p.937).

UPFs are often high in salt, sugar, and fat, low in fibre, and energy dense but nutrient poor—the opposite of a healthy diet. They include packaged snacks, soft drinks, reconstituted meats and ice-creams, ready meals, many breakfast cereals, and other foods often referred to as “junk food” such as burgers, deep-fried chicken and similar fast foods. Their rapid growth has led to market dominance and as such, has driven a global rise in poor health outcomes and diet-related diseases (Belluz & Hall, 2025; Rockström, et al., 2025; Wood, et al, 2025).

Diets high in UPFs can be linked to non-communicable diseases including anxiety and depression (Belluz and Hall, 2025; Elizabeth et al. 2020; Lane et al. 2024), obesity, type 2 diabetes, stroke, high blood pressure, heart disease, premature death (AIMH, 2024; Rockström, et al., 2025), and childhood obesity (Libuy et al., 2023; White et al., 2020, 2025). The Australian Institute of Health

and Welfare (AIHM) reported overweight and obesity were the top contributors to total disease burden in 2024 (8.3%), overtaking tobacco use as the main risk factor (AIHM, 2024).

Research confirms that UPFs are fast becoming Australia's national diet (Baker et al., 2025). Strategic urban planning and targeted policy interventions in underserved suburban and regional locations are essential for mitigating inequalities and promoting healthier communities (Marzan, et al., 2025, p.1) Consequently, Van Der Velden, is urging a transformation of planning frameworks to prioritise public health outcomes (Preiss & Cook, Sept 2, 2025).

Recommended reading:

1. [Ultra-Processed Foods and Human Health](#) (infographic)
2. [The Ultra-processed foods problem is driven by commercial interests, not individual weakness. Here's how to fix it](#)

Economics – cost-benefit analysis

Australia is '[experiencing a fast food boom](#)', with '[the average Australian family spending \\$2000 a year on fast food](#)'. According to an [Industry Insights Report \(June 2025\) published by Burgess Rawson](#), the sector expanded by 'an average annual rate of 2.6% over the past five years', with the total number of stores nearing 27,000 and revenue reaching \$30 bn in 2025. The authors comment that:

Leading brands like McDonalds are strategically expanding to ensure most Australians are within a five-minute drive of an outlet...over [20%] of Australians consume fast food weekly, with many opting for meal deals, reflecting consistent and growing demand for convenient dining options.

The net economic impact of fast-food outlets involves a complex assessment of, on the one hand, their direct economic contributions and, on the other, their substantial indirect costs related to the public health burden, environmental pollution and climate change. A comprehensive cost-benefit analysis typically reveals that the long-term social costs often outweigh the immediate economic benefits (Inegdedion 2024).

Direct Economic Benefits

From a macro-economic perspective, the fast-food industry provides significant direct economic benefits:

- **Employment:** According to [Jobs and Skills Australia](#), the sector directly employs 48,300 people nationally, with an average age of 17. Applying a per capita calculation would indicate that Victoria accounts for just over 12,000 of these jobs
- **Tax Revenue and Investment:** The \$30bn sector generates substantial tax revenue (income tax, GST, land tax, Council rates) and attracts significant investment, with properties in high-traffic areas considered secure and profitable investments
- **Supply Chain Support:** The fast-food sector supports a large supply chain, including food manufacturing, agriculture, and logistics, contributing to the overall economy via a substantial multiplier effect

- **Convenience and Growth:** Driven by consumer demand for convenience, the industry has shown robust revenue growth and resilience even during economic fluctuations and a cost-of-living crisis

Health and Environmental Costs

These macro-economic benefits must be weighed against the very substantial direct and indirect costs that the fast and unhealthy food industries generate, which are borne by society as a whole.

Health Impacts

- **Obesity & Chronic Disease:** As discussed above, frequent fast-food consumption is linked to higher risks of obesity, type 2 diabetes, cardiovascular diseases, and certain cancers.
- **Healthcare Burden:** These diet-related chronic conditions result in massive direct healthcare costs (e.g., obesity alone cost the Australian community \$11.8 billion in 2018). These costs are borne by individuals, families, businesses, and the Australian public health system. On current trends, [the burden of dietary-related chronic disease will reach \\$62bn by 2030 and nearly \\$230bn by 2060 - 3.5% of GDP](#)
- **Health Inequality:** Fast food outlets are often more prevalent in socioeconomically disadvantaged areas, exacerbating existing health inequalities. Victoria is in many ways becoming a state of 'rich and poor eaters', with residents in lower socioeconomic areas deprived of access to affordable, nutritious and culturally relevant food

Environmental Impacts

- **Greenhouse Gas Emissions:** The food system accounts for up to one-third of total greenhouse gas emissions; and the ultra-processed food industry (including the fast-food industry) is responsible for up to one third of total diet-related emissions (Anastasiou et al 2022)
- **Waste & Pollution:** The fast-food industry generates vast amounts of single-use packaging, much of which is plastic, contributing to landfill waste, methane emissions from degradation, and general pollution. The production of virgin plastic packaging is energy-intensive and releases large amounts of greenhouse gases
- **Resource Use:** Meat-based fast-food production is highly resource-intensive, requiring large amounts of land, water, and energy compared to plant-based alternatives

Net Impact

In a net social cost-benefit analysis, the direct economic benefits of job creation and tax revenues are eclipsed by the direct and indirect health and environmental costs. The long-term economic burdens of chronic disease treatment and environmental remediation costs (e.g., waste management, climate change mitigation) represent significant negative externalities that are not included in the price of a fast-food meal, but rather, are borne by society in the form of taxation, a growing burden on the public health system, and the multiplying impacts of dealing with pollution, waste and accelerating climate change. From a societal welfare perspective, the net economic

impact of fast-food outlets is clearly negative. This conclusion is reinforced by the responsibilities and obligations of the Victorian government to optimise Victorian's health and wellbeing (*Public Health Act 2008*) and take effective action to mitigate and reduce the impacts of climate change (*Climate Change Act 2017*).

Moreover, the economic benefit generated by fast food franchises must also be assessed in relation to their negative impact on locally owned businesses. Given that this [industry spent over \\$400 million in advertising](#) its products in 2024, it is hardly surprising its market share continues to grow at nearly 3% per year, at the expense of locally owned businesses. Further, given that profits flow to multinational corporations, these franchises drain wealth from local economies.

In contrast, restricting further fast-food expansion and incentivising locally owned, healthy food outlets would deliver significant economic, social, and environmental benefits (Benton & Bailey, 2019; Godde, Nelson & Abebe (2024), Ruetz, Edwards & Zhang, 2023). Last year, researchers at Oxford University and London School of Economics found that **"transforming the food system to one that is healthier, equitable, and sustainable would create \$10 trillion USD in benefits per year, requiring less than 5% of that figure in investment"** (Food Systems Economic Commission, 2024)."

As Rockstrom et al (2025) comment, "[F]ood systems still offer an unprecedented opportunity to build the resilience of environmental, health, economic, and social systems, and are uniquely placed to enhance human wellbeing while also contributing to Earth-system stability". (p.1625).

Endorsements

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Appendices

See below for the Appendices to this document:

Appendix 1 - Proposed amendments to the VPP

Appendix 2 - City of Greater Geelong - Food Security - Considerations

Appendix 3 - Sustain Letter_Whittlesea_VPP

Appendix 4 - Letter to Nick Rose at Sustain from BCC - Response to Parliamentary Inquiry into food security in Victoria - 27 October 2025

APPENDIX 1 - Proposed amendments to the Victorian Planning Provisions

Clause	Feedback / Recommendation	Supporting evidence
<p>11 SETTLEMENT</p> <p>Planning is to anticipate and respond to the needs of existing and future communities through provision of zoned and serviced land for housing, employment, recreation and open space, commercial and community facilities and infrastructure.</p> <p>Planning is to contribute towards: (1)</p> <ul style="list-style-type: none"> • Housing for all Victorians. • Accessible jobs and services. • Great places, suburbs and towns. • Sustainable environments • Self-determination and caring for Country. <p>Planning is to recognise the need for, and as far as practicable contribute towards: (2)</p> <ul style="list-style-type: none"> ○ Health, wellbeing and safety. ○ Diversity of choice. ○ Adaptation in response to changing technology. 	<p>Add additional point under ‘Planning is to contribute towards...’ to include: ‘Healthy food environments’ (1)</p> <p>Additional dot point ‘food security’ should be added to the sentence “Planning is to recognise the need for, and as far as practicable contribute towards...”. (2)</p>	<p>Strategic urban planning will be the key to creating supportive and enabling environments for health, making sure that health and equity considerations are integrated throughout the planning process, investments, and policy decisions at the local level (World Health Organisation, 2023)</p> <p>Unhealthy foods, particularly those that are classified as ultra processed foods (UPFs), dominate supermarket shelves, quick service restaurants (QSRs), and fast-food outlets. For those living in socioeconomically disadvantaged areas within Victoria, this over saturation is significantly higher as are the associated risks of ill health (Marzan et al, 2025; Thornton et al., 2016; Marzan, 2025, (Rockström, et al., 2025, p.1641)).</p>

<ul style="list-style-type: none"> o Economic viability. o A high standard of environmental sustainability, urban design and amenity. o Climate change adaptation and mitigation. o Prevention of land, water, air and noise pollution. o Protecting, conserving and improving biodiversity, waterways and other natural resources. o Accessibility. o Land use and transport integration. o Waste minimisation and resource recovery. <p>Planning is to prevent environmental, human health and amenity problems created by siting incompatible land uses close together.</p> <p>Planning is to facilitate sustainable development that takes full advantage of existing settlement patterns and investment in transport, utility, social, community and commercial infrastructure and services.</p>		<p>Research indicates that QSRs are frequently positioned nearby near primary and secondary schools in the most disadvantaged areas of the state (Thorton et al., 2016).</p>
<p>11.03-1S Activity centres and precincts</p> <p>Objective</p> <p>To encourage the concentration of major retail, residential, commercial, administrative, entertainment and cultural</p>	<p>There is an opportunity for a strong State Policy that supports health outcomes under this clause.</p> <p>Suggest objective is modified to read: <i>To encourage the concentration of major retail, residential, commercial, administrative,</i></p>	<p>Poor urban planning can contribute to poor air quality, limited access to green areas, longer travel distances, and unhealthy food environments. Consequences include greater exposure to air/noise pollution and heat, reduced physical activity and social cohesion, fewer opportunities for active transport, and</p>

developments into activity centres with good public transport services. (1)

Strategies

Build up the central activity areas of Major regional cities, Metropolitan activity centres, Priority Precincts, Suburban Rail Loop Precincts and Activity Centres - Housing Choice and Stations as a focus for high-quality development, activity and living that:

- Are a focus for business, shopping, working, leisure and community facilities.
- Provide different types of housing, including forms of higher density housing.
- Are connected by transport.
- Maximise choices in services, employment and social interaction.

Undertake strategic planning for the use and development of land in and around Major regional cities, Metropolitan activity centres, Priority Precincts, Suburban Rail Loop Precincts and Activity Centres - Housing Choice and Stations and their residential catchments.

Encourage a diversity of housing types at higher densities in and around Major regional cities, Metropolitan activity centres, Priority Precincts, Suburban Rail Loop Precincts

entertainment and cultural developments into activity centres with good public transport services, to improve health and sustainability outcomes. (1)

Suggest this strategy be modified to read "*Support the continued growth and diversification of activity centres to give communities access to a wide range of goods and services, community health outcomes, provide local employment, and support local economies*". (2)

Suggest adding the following policy document:

- [National Preventive Health Strategy 2021-2030](#) (3)

higher fast-food consumption—ultimately impacting respiratory and cardiovascular health, obesity, and cognitive function (Nieuwenhuijsen, 2016).

and Activity Centres - Housing Choice and Stations and their residential catchments.

Reduce the number of private motorised trips by concentrating activities that generate high numbers of (non-freight) trips in highly accessible activity centres.

Improve access by walking, cycling and public transport to services and facilities.

Support the continued growth and diversification of activity centres to give communities access to a wide range of goods and services, provide local employment and support local economies. (2)

Improve the social, economic and environmental performance and amenity of activity centres.

Policy documents (3)

Consider as relevant:

- *Urban Design Guidelines for Victoria* (Department of Environment, Land, Water and Planning, 2017)
- *Apartment Design Guidelines for Victoria* (Department of Environment, Land, Water and Planning, 2021)
- *Precinct Structure Planning Guidelines: New Communities in Victoria* (Victorian Planning Authority, 2021)

<p>13.07 Amenity, Human Health and Safety</p> <p>Current objective:</p> <p>To protect community amenity, human health (1) and safety while facilitating appropriate commercial, industrial, infrastructure or other uses with potential adverse off-site impacts.</p> <p>Strategies</p> <ul style="list-style-type: none"> • Ensure that use or development of land is compatible with adjoining and nearby land uses (2) • Avoid locating incompatible uses in areas that may be impacted by adverse off-site impacts from commercial, industrial and other uses. • Avoid or otherwise minimise adverse off-site impacts from commercial, industrial and other uses through land use separation, siting, building design and operational measures. • Protect commercial, industrial and other employment generating uses from encroachment by use or development that would compromise the ability of those uses to function safely and effectively. <p>Policy documents</p> <p>Consider as relevant:</p> <ul style="list-style-type: none"> • <i>Separation Distance Guideline</i> (Environment Protection Authority, August 2024) 	<p>Elevate community health as a core planning principle</p> <p>The objective should explicitly include community health as a key area, to enable health outcomes to be considered in land use decisions. Community health must encompass food security, understood as equitable access to whole, nutritious foods, and include people’s ability to access and grow food locally. This reflects public health standards and acknowledges the role of planning in shaping environments that support wellbeing across all demographics. (1)</p> <p>Embed food security within human health objectives</p> <p>The definition of <i>human health</i> in this clause should be broadened to include food security, which must reflect:</p> <ul style="list-style-type: none"> • Equal access to nutritious food • Opportunities for local food growing (e.g. community gardens, edible landscapes) 	<p>A healthy diet is only possible if people have access to healthy foods where they live and work.</p> <ul style="list-style-type: none"> • Urban planning can address “food deserts” – locations where fresh food is unavailable, and only unhealthy, heavily processed foods, high in sugar, fat and carbohydrates, are accessible and affordable (World Health Organization, 2020). <p>A meta-analysis of studies with pooled effect sizes showed that proximity of fast-food outlets was associated with a higher risk of obesity, while proximity of supermarkets and fresh fruit and vegetable stores was associated with a lower risk of obesity (Gonçalves et al., 2021)</p> <p>There is an association between food-outlet availability near secondary schools and junk-food purchasing among Australian adolescents:</p> <ul style="list-style-type: none"> • The research shows that the availability of major fast-food chains near Australian secondary schools appears to be a key driver of Australian students'

<ul style="list-style-type: none"> • <i>Landfill Buffer Guideline</i> (Environment Protection Authority, August 2024). (2) 	<ul style="list-style-type: none"> • Support for local food supply chains that enable reliable access to fresh food within communities. (1) <p>Reference Relevant Policy Documents and Guidelines</p> <p>To support implementation, the clause should reference Victorian health guidelines or other evidence-based planning tools that promote healthy built environments. Suggested inclusions:</p> <ul style="list-style-type: none"> • Healthy Choices Guidelines • Urban Design Guidelines for Victoria • Planning a Resilient Food System for Victoria (Carey et al., 2024). (2) 	<p>discretionary food purchasing (Trapp et al., 2021)</p> <p>Diets high in UPFs can be linked to non-communicable diseases including anxiety and depression (Belluz and Hall, 2025; Elizabeth et al. 2020; Lane et al. 2024), obesity, type 2 diabetes, stroke, high blood pressure, heart disease, premature death (Australian Institute of Health and Welfare [AIMH], 2018; <i>Rockström, et al., 2025</i>), and childhood obesity (Libuy, Church, Ploubidis & Fitzsimons, 2023; White, et al, 2020, 2025). The AIHM reported overweight and obesity were the top contributors to total disease burden in 2024 (8.3%).</p> <p>Recent authoritative research indicates that ultra processed foods are fast becoming Australia’s national diet (Baker, Corvalan, Monteiro, Scrinis, Machado, 2025)</p>
<p>14.01-1S 20/03/2023 VC229 - Protection of agricultural land</p>	<p>Suggest objective is modified to read: <i>to protect the state’s agricultural base and ensure long-term food security by preserving</i></p>	<p>Mismanagement of land already threatens and will continue to threaten future global food security and energy security, enhance water</p>

<p>Objective</p> <p>To protect the state’s agricultural base by preserving productive farmland. (1)</p> <p>Strategies <small>OBJ</small></p> <p>Identify areas of productive agricultural land, including land for primary production and intensive agriculture.</p> <p>Consider state, regional and local, issues and characteristics when assessing agricultural quality and productivity. (2)</p> <p>Avoid permanent removal of productive agricultural land from the state's agricultural base without consideration of the economic importance of the land for the agricultural production and processing sectors.</p> <p>Protect productive farmland that is of strategic significance in the local or regional context.</p> <p>Protect productive agricultural land from unplanned loss due to permanent changes in land use.</p> <p>Prevent inappropriately dispersed urban activities in rural areas.</p>	<p><i>productive farmland and supporting climate-resilient food systems</i> (redefine 'productive' land) (1)</p> <p>Recognise the role of productive agricultural land in contributing to local, regional, and national food security. (2)</p>	<p>insecurity, hamper capacities to adapt to, and mitigate, climate change, and also alter biodiversity (Sanz et al., 2017).</p> <p>Agricultural soil degradation is a pervasive phenomenon related to agricultural intensification and increasing food demand. When soil is degraded, several functions, ecosystem services, and habitat support are impacted (Pereira et al., 2023).</p> <ul style="list-style-type: none"> • Agriculture is the dominant sector driving degradation, yet one of the sectors most susceptible to the effects of deteriorating land condition <p>(Dadzie et al., 2023).</p> <p>Australian agricultural soils are highly vulnerable to degradation—erosion, compaction, salinization, acidification, and contamination—leading to fertility loss, desertification, and reduced food security (Dadzie et al., 2023).</p> <p>There is a National Soil Strategy in Australia (Dadzie et al., 2023), and there is an opportunity to address and prevent future land degradation</p>
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Protect strategically important agricultural and primary production land from incompatible uses.

Limit new housing development in rural areas by:

- Directing housing growth into existing settlements.
- Discouraging development of isolated small lots in the rural zones from use for dwellings or other incompatible uses.
- Encouraging consolidation of existing isolated small lots in rural zones.

Identify areas of productive agricultural land by consulting with the Department of Energy, Environment and Climate Action and using available information.

In considering a proposal to use, subdivide or develop agricultural land, consider the:

- Desirability and impacts of removing the land from primary production, given its agricultural productivity.
- Impacts on the continuation of primary production on adjacent land, with particular regard to land values and the viability of infrastructure for such production.
- Compatibility between the proposed or likely development and the existing use of the surrounding land.
- The potential impacts of land use and development on the spread of plant and animal pests from areas of known infestation into agricultural areas.

and support the strategy through Planning Provisions.

Sustainability and productivity of land can be redefined through a collaboration with First Nations.

- As such, healthier and sustainable land use in Aotearoa is driven by Māori-led regenerative practices that integrate Hua Parakore principles, reducing agrichemicals and restoring natural soil and ecosystem health. **This approach strengthens biodiversity, captures carbon, and deepens cultural connections to land, creating resilient landscapes for future generations** (Wellington City Council, 2023).

<ul style="list-style-type: none"> • Land capability. <p>Avoid the subdivision of productive agricultural land from diminishing the long-term productive capacity of the land.</p> <p>Give priority to the re-structure of inappropriate subdivisions where they exist on productive agricultural land.</p> <p>Balance the potential off-site effects of a use or development proposal (such as degradation of soil or water quality and land salinisation) against the benefits of the proposal.</p>		
<p>15.01-3S Subdivision design</p> <p>Objective</p> <p>To ensure the design of subdivisions achieves attractive, safe, accessible, diverse and sustainable neighbourhoods. (1)</p> <p>Strategies <small>OBJ</small></p> <p>In the development of new residential areas and in the redevelopment of existing areas, subdivision should be designed to create liveable and sustainable communities by:</p> <p>Creating compact neighbourhoods that have walkable distances between activities.</p>	<p>The objective should include health outcomes. Suggest rewording objective to: <i>“To ensure the design of subdivisions achieves attractive, safe, accessible, diverse, healthy and sustainable neighbourhoods”.</i> (1)</p>	<p>Haysom (2021) argues that food-sensitive planning and urban design can systematically address urban food insecurity.</p> <ul style="list-style-type: none"> • Spatial planning is a direct tool to improve food access and health outcomes. <p>A systematic review of 55 studies found that proximity to healthy food outlets (e.g., full-service restaurants, supermarkets) was negatively associated with diabetes, cardiovascular disease, and chronic disease mortality.</p> <ul style="list-style-type: none"> • Additionally, high density of fast-food outlets was positively associated with

<p>Developing activity centres in appropriate locations with a mix of uses and services and access to public transport.</p> <p>Creating neighbourhood centres that include services to meet day to day needs.</p> <p>Creating urban places with a strong sense of place that are functional, safe and attractive.</p> <p>Providing a range of lot sizes to suit a variety of dwelling and household types to meet the needs and aspirations of different groups of people.</p> <p>Creating landscaped streets and a network of open spaces to meet a variety of needs with links to regional parks where possible.</p> <p>Protecting and enhancing habitat for native flora and fauna, and providing opportunities for people to experience nature in urban areas.</p> <p>Facilitating an urban structure where neighbourhoods are clustered to support larger activity centres served by high quality public transport.</p> <p>Reduce car dependency by allowing for:</p> <p>Convenient and safe public transport.</p>		<p>these conditions (Gebremariam et al. 2025).</p> <p>Fast-food outlet density had a direct impact on obesity and chronic disease rates, while convenience store prevalence contributed indirectly via food insecurity Kotval-K & Nedd (2025).</p>
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Safe and attractive spaces and networks for walking and cycling.

Subdivision layouts that allow easy movement within and between neighbourhoods.

A convenient and safe road network.

Minimising exposure of sensitive uses to air and noise pollution from the transport system.

Being accessible to people with disabilities.

Creating an urban structure that:

Responds to climate related hazards.

Incorporates integrated water management, including sustainable irrigation of open space.

Minimises peak demand on the electricity network.

Supports energy efficiency and solar energy generation through urban layout and lot orientation.

Supports waste minimisation and increased resource recovery.

<p>Providing utilities and services that support the uptake of renewable energy technologies, such as microgrids and energy storage systems, including batteries.</p> <p>Providing all-electric lots.</p>		
<p>15.01-S4 Healthy Neighbourhoods</p> <p>Objective</p> <p>To achieve neighbourhoods that foster healthy and active living and community wellbeing.</p> <p>Strategies (1)</p> <p>Design neighbourhoods that foster community interaction and make it easy for people of all ages and abilities to live healthy lifestyles and engage in regular physical activity by providing:</p> <ul style="list-style-type: none"> • Connected, safe, pleasant and attractive walking and cycling networks that enable and promote walking and cycling as a part of daily life. • Streets with direct, safe and convenient access to destinations. • Conveniently located public spaces for active recreation and leisure. • Accessibly located public transport stops. • Amenities and protection to support physical activity in all weather conditions. 	<p>Stronger policy supporting health outcomes and food security should be included here.</p> <p>Suggest inclusion of the following strategies:</p> <p>‘Ensure neighbourhoods provide equitable access to healthy food environments by:</p> <ul style="list-style-type: none"> • Encouraging the establishment of healthy food outlets within activity centres. (1) <p>Suggest adding the following policy documents:</p> <ul style="list-style-type: none"> • National Preventive Health Strategy 2021-2030 (2) 	<p>Association between food-outlet availability near secondary schools and junk-food purchasing among Australian adolescents, showing the availability of major fast-food chains near Australian secondary schools appears to be a key driver of Australian students' discretionary food purchasing (Trapp et al., 2021)</p> <p>Close proximity (i.e., less than 1 km) to the nearest fast-food outlet or convenience store in the home neighborhood increased the likelihood of food purchasing from these food establishments at least once per week by adolescents (p < 0.05).</p> <ul style="list-style-type: none"> • Macro-level regulations and policies are required to amend the health-detracting neighborhood food environment surrounding children and youth's home and school (He et al., 2012).

Create 20-minute neighbourhoods, that give people the ability to meet most of their everyday needs within a 20 minute walk, cycle or local public transport trip from their home.

Policy documents.

Consider as relevant:

Urban Design Guidelines for Victoria (Department of Environment, Land, Water and Planning, 2017). (2)

A meta-analysis of studies with pooled effect sizes showed:

- **proximity of fast-food outlets** was associated with a higher risk of obesity
- **proximity of supermarkets and fresh fruit and vegetable stores** was associated with a lower risk of obesity (Gonçalves et al., 2021)

Implementation of public food-regulation policies for four years was associated with a **downward trend of BMI in the student population.**

- **Banning sweetened beverage** sales, establishing adequate food and snack portion sizes, and adopting nutritional criteria were among the actions required by law. From the findings, it was evident that healthy food strategies had positive impact from the strict law regulation and not solely due to adherence to guidelines (Li et al., 2021)

Academic literature strongly establishes a positive relationship between **dense alcohol outlets and increased numbers of drinkers**, as well as more individual-level drinking.

- Density's effects on increased student binge drinking were, here, largely channeled by students' grade level. Thus

		<p>older students residing in a catchment with denser alcohol outlets were likelier than other students to binge drink with relative frequency (Lo et al., 2013).</p>
<p>17.01-1 Diversified Economy</p> <p>Objective</p> <p>To strengthen and diversify the economy.</p> <p>Strategies (1)</p> <p>Protect and strengthen existing and planned employment areas and plan for new employment areas.</p> <p>Facilitate regional, cross-border and inter-regional relationships to harness emerging economic opportunities.</p> <p>Facilitate growth in a range of employment sectors, including health, education, retail, tourism, knowledge industries and professional and technical services based on the emerging and existing strengths of each region.</p> <p>Improve access to jobs closer to where people live.</p> <p>Support rural economies to grow and diversify.</p>	<p>Inclusion of strategies to support health outcomes and food security in this clause are needed. Examples for inclusion include:</p> <ul style="list-style-type: none"> • Encourage healthy food retail in activity centres and growth areas (1) 	<p>The Healthy Food Policy Project and the Center for Agriculture & Food Systems have documented how cities across the U.S. use zoning overlays to support urban agriculture and healthy food access. These overlays allow for:</p> <ul style="list-style-type: none"> • Community gardens • Farmers markets • Food hubs • Composting and small-scale animal keeping <p>These zoning reforms have been linked to increased fruit and vegetable consumption, community engagement, and resilience in food supply in the U.S (Centre for Agriculture and Food Systems, 2024).</p> <p>The Lincoln Institute of Land Policy and Kwantlen Polytechnic University developed a toolkit showing how planning for food systems can:</p> <ul style="list-style-type: none"> • Support economic resilience • Foster entrepreneurship

		<ul style="list-style-type: none"> Strengthen regional food infrastructure (Taebe & Watson, 2024). <p>Incentive-based or performance zoning can be used to encourage full-service fresh grocery stores and farmers' markets (Nixon and Doud, 2011).</p>
<p>19.02-2S Education facilities</p> <p>Objective OBJ</p> <p>To assist the integration of education and early childhood facilities with local and regional communities.</p> <p>Strategies 1 OBJ</p> <p>Consider demographic trends, existing and future demand requirements and the integration of facilities into communities in planning for the location of education and early childhood facilities.</p>	<p>Suggest the following additional strategies:</p> <ul style="list-style-type: none"> Encourage education and early childhood facilities to include food environments and edible gardens. (1) 	<p>Implementation of public food-regulation policies for four years was associated with a downward trend of BMI in the student population. Banning sweetened beverage sales, establishing adequate food and snack portion sizes, and adopting nutritional criteria were among the actions required by law.</p> <ul style="list-style-type: none"> From the findings, it was evident that healthy food strategies had positive impact from the strict law regulation and not solely due to adherence to guidelines (Li et al., 2021) <p>As an example, a concept of the biodiverse edible school adopts a transdisciplinary approach to integrating these issues in food</p>

<p>Locate childcare, kindergarten and primary school facilities to maximise access by public transport and safe walking and cycling routes.</p> <p>Ensure childcare, kindergarten and primary school and secondary school facilities provide safe vehicular drop-off zones.</p> <p>Facilitate the establishment and expansion of primary and secondary education facilities to meet the existing and future education needs of communities.</p> <p>Recognise that primary and secondary education facilities are different to dwellings in their purpose and function and can have different built form (including height, scale and mass).</p> <p>Locate secondary school and tertiary education facilities in designated education precincts and areas that are highly accessible to public transport. (2)</p> <p>Locate tertiary education facilities within or adjacent to activity centres.</p> <p>Ensure streets and accessways adjoining education and early childhood facilities are designed to encourage safe bicycle and pedestrian access.</p>		<p>education and environmental education, and incorporates</p> <ul style="list-style-type: none">○ a school kitchen serving fresh, local and seasonal foods○ a garden on the school's grounds;○ wild urban habitats of edible plants in the vicinity of the school (Fischer et al., 2019). <p>The successfully implemented pilot project in Berlin, Germany highlights promising functions and components of urban green infrastructure that can support both cultural (e.g., related to pupil's local identity and experience of nature) and provisioning (food related) ecosystem services in urban settings.</p>
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<p>Consider the existing and future transport network and transport connectivity.</p> <p>Develop libraries as community-based learning centres.</p> <p>Co-locate a kindergarten facility with all new Victorian Government primary schools.</p>		
<p>53.04 CONVENIENCE RESTAURANT AND TAKE-AWAY FOOD PREMISE</p> <p>Decision guidelines (1) <small>OBJ</small></p> <p>Whether the location is appropriate for a convenience restaurant or take-away food premises having regard to:</p> <ul style="list-style-type: none"> • Amenity of the neighbourhood. • Proximity of the land to non-residential uses and zones • Effect of the use on heritage and environment features • Capacity of the land to contain significant off-site effects • Access to land in a Transport Zone 2 or Transport Zone 3 • The suitability of the land for a residential use 	<p>Amend the following decision guidelines:</p> <ul style="list-style-type: none"> • Proximity of the land to non-residential uses and zones, <i>including early childhood and education facilities (1)</i> 	<p>Association between food-outlet availability near secondary schools and junk-food purchasing among Australian adolescents, showing the availability of major fast-food chains near Australian secondary schools appears to be a key driver of Australian students' discretionary food purchasing (Trapp et al., 2021)</p> <p>Close proximity (i.e., less than 1 km) to the nearest fast-food outlet or convenience store in the home neighborhood increased the likelihood of food purchasing from these food establishments at least once per week by adolescents (p < 0.05).</p> <ul style="list-style-type: none"> • Macro-level regulations and policies are required to amend the health-detracting neighborhood food environment surrounding children and youth's home and school (He et al., 2012).

		<p>A meta-analysis of studies with pooled effect sizes showed:</p> <ul style="list-style-type: none">• proximity of fast-food outlets was associated with a higher risk of obesity• proximity of supermarkets and fresh fruit and vegetable stores was associated with a lower risk of obesity (Gonçalves et al., 2021) <p>Implementation of public food-regulation policies for four years was associated with a downward trend of BMI in the student population.</p> <ul style="list-style-type: none">• Banning sweetened beverage sales, establishing adequate food and snack portion sizes, and adopting nutritional criteria were among the actions required by law. From the findings, it was evident that healthy food strategies had positive impact from the strict law regulation and not solely due to adherence to guidelines (Li et al., 2021) <p>Academica literature strongly establishes a positive relationship between dense alcohol outlets and increased numbers of drinkers, as well as more individual-level drinking.</p>
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		<ul style="list-style-type: none"> • Density’s effects on increased student binge drinking were, here, largely channeled by students’ grade level. Thus older students residing in a catchment with denser alcohol outlets were likelier than other students to binge drink with relative frequency (Lo et al., 2013).
<p>56.03 Liveable and sustainable communities</p>	<p><i>Suggest heading modified to “Livable, healthy and sustainable communities”</i></p>	<p>Strategic urban planning will be the key to creating supportive and enabling environments for health, making sure that health and equity considerations are integrated throughout the planning process, investments, and policy decisions at the local level (World Health Organisation, 2023)</p>

THE CITY OF
GREATER GEELONG

**CONSIDERATIONS FOR
THE IMPLEMENTATION
OF:**

**RECOMMENDATION 24
OF THE VICTORIAN
GOVERNMENT
RESPONSE TO THE
PARLIAMENTARY
INQUIRY INTO FOOD
SECURITY IN VICTORIA**

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NOVEMBER 2025

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Executive Summary

The City of Greater Geelong welcomes the Victorian Government's commitment to revising the Victorian Planning Provisions (VPP) in response to Recommendation 24 from the 2024 Parliamentary Inquiry into Food Security. This recommendation calls for health and food security to be explicitly included as objectives in planning decisions under the Planning and Environment Act 1987.

The document outlines the urgent need for planning reforms to address unhealthy food environments, particularly in vulnerable communities. Local data reveals high rates of fast-food consumption, sugar-sweetened beverage intake, overweight and obesity, and food insecurity, especially in lower socioeconomic areas. Current planning frameworks allow drive-through fast-food outlets without local government oversight, contributing to these health challenges.

Key considerations include:

- Revising planning schemes to prioritise health and food security.
- Requiring permits for all fast-food outlets and limiting their density, especially near sensitive locations like schools and health services.
- Establishing clear definitions for fast-food and healthy food outlets, informed by best-practice frameworks.
- Banning unhealthy food advertising on public transport infrastructure, following South Australia's example.
- Supporting local government with dedicated funding for Health Impact Assessments (HIAs) to ensure planning decisions promote public health.

The submission proposes amendments to the Planning and Environment Act to empower local governments to regulate food outlets based on public health objectives, assess cumulative impacts, and prioritise land use that supports healthy, liveable communities.

By embedding health and food security into Victoria's planning system, the City of Greater Geelong advocates for reforms that will foster resilient, equitable, and thriving communities, and stands ready to collaborate with the State Government, First Peoples, and those experiencing food insecurity to achieve lasting public health benefits.

Considerations

The City of Greater Geelong welcomes the Victorian Government's commitment to reviewing the Victorian Planning Provisions (VPP) in response to Recommendation 24 of the 2024 Parliamentary Inquiry into Food Security.

Recommendation 24

That the Victorian Government revise the Victorian planning provisions (Planning and Environment Act 1987) to include health and food security as an objective when local governments and other planning authorities are making planning decisions.

Response: (currently under review)

The Victorian Government will review options for revising the Victoria Planning Provisions to include health and food security objectives and improve health outcomes.

This could include consideration of changes to the planning system to:

- Improve access to providers of affordable and nutritious food, and reduce the density of some large chain food premises to protect health outcomes in Victoria.*
- Support councils to implement the Victorian Public Health and Wellbeing Plan and associated Municipal Public Health and Wellbeing*

Plans to meet their obligations under the Public Health and Wellbeing Act 2008.

The Government is implementing food security objectives through the Planning for Melbourne's Green Wedges and Agricultural Land Action Plan 2024 (Action Plan). The Action Plan includes several actions to ensure stronger protections for Victoria's productive agricultural land and to limit urban expansion and fragmentation into productive agricultural land.

Further work is required to determine the most effective way to implement these objectives into the Victoria Planning Provisions and to fully consider impacts on local economic growth and jobs. The Government will continue to engage with First Peoples and other stakeholders, including those with lived experience of food insecurity.

Ensuring health and food security are prioritised within Victoria's planning framework is essential for fostering resilient, equitable, and thriving communities. The increasing prevalence of unhealthy food environments and the associated health impacts highlight a pressing need to reform planning policies so that they actively support public health and wellbeing objectives.

By addressing these challenges through meaningful policy change, the Victorian Government can better protect vulnerable populations and promote access to nutritious, affordable food for all Victorians, making it crucial to advocate for the implementation of this recommendation.

We have raised these considerations to highlight the urgent need for planning reform that addresses the links between the built environment, food access, and health outcomes.

Without targeted intervention, current planning settings risk perpetuating environments where unhealthy food choices are readily available, particularly in vulnerable communities. By drawing attention to these issues, we seek to ensure that future planning policies foster healthier neighbourhoods, reduce health inequities, and support the wellbeing of all Victorians.

Furthermore, these considerations are based on evidence showing how planning frameworks can directly influence dietary behaviours, rates of overweight and obesity, and levels of food insecurity at a local level and therefore why local planning is crucial.

Addressing these factors at the policy and legislative level is critical to achieving lasting improvements in public health and creating more liveable, equitable communities across Victoria.

CURRENT PLANNING POSITION

In Greater Geelong, the current planning framework is contributing to the proliferation of drive-through convenience retail, particularly fast-food outlets, across growth areas and lower socioeconomic neighbourhoods.

These developments are often located near sensitive community infrastructure such as schools, early learning centres, and public transport hubs.

Under current VPP settings, drive-through convenience restaurants are classified as Section 1 uses in the

Commercial 1 Zone, meaning they do not require a planning permit. This removes local governments' ability to assess or refuse applications, regardless of their potential impact on community health, land use priorities, or alignment with local planning strategies.

As a result, strategic sites that could support diverse, health-promoting uses are increasingly being occupied by fast-food outlets, undermining broader state and local goals for economic development, health equity, and liveability.

LOCAL DATA

The health impacts of this planning gap are evident in local data.

In greater Geelong 16% of residents consume takeaway food more than once a week. In Planning Area 1 - Armstrong Creek, Charlemont, and Marshall, this rate nearly doubles to 30% of residents while in Planning Area 13 - Corio, Norlane, and North Shore, there is nearly a 50% increase at 23% of residents.

The average daily sugar-sweetened beverage consumption for greater Geelong is 17%. This figure provides important context when comparing localised data, such as the significantly higher rates in Planning Area 3 - Bellarine, Clifton Springs, Curlewis, and Drysdale (28%) and Planning Area 13 - Corio, Norlane, and North Shore (28%).

These dietary patterns are contributing to elevated rates of overweight and obesity, with 65% of Greater Geelong adults affected, significantly higher than the Victorian average of 54%. In Areas 1 and 13, this figure climbs to 75%, with 41% of Area 13 residents classified as obese, compared to the municipal average of 28%. Food insecurity is also a growing concern, with **8% of Greater Geelong residents reporting they ran out of food in the past year.**

Once more this figure provides important context when considering localised data, with food insecurity increasing to 23% in Planning Area 13, nearly triple the region's average and increases to 12% in Planning Area 6 - Whittington, Newcomb, Moolap.

This local data within a regional context highlights the urgent need for planning interventions that prioritise equitable access to nutritious, affordable food.

FAST-FOOD AND HEALTHY FOOD OUTLET DEFINITIONS

The Australian Institute of Health and Welfare estimates that dietary risks already cost the health system over \$16 billion annually, while the Obesity Evidence Hub projects this will rise to \$228 billion by 2060 if left unaddressed. At the heart of this challenge is the way food environments are shaped, not just by what is available, but by how food is marketed, priced, and promoted.

Current spatial datasets often categorise supermarkets as "healthy food outlets," yet in practice, these environments are heavily influenced by multinational corporations and profit-driven marketing strategies that prioritise ultra-processed foods. This highlights the need for a more nuanced and evidence-based definition of healthy food retail, one that reflects best practice and prioritises outlets where nutritious food is both available and affordable. Without this, planning systems risk reinforcing unhealthy food environments, particularly in communities already experiencing disadvantage.

Recommendation 24 opens the door for health-based planning controls, including:

- Zoning amendments requiring permits for all fast-food outlets regardless of zone.
- Consideration of fast-food outlet density in an area.
- Restrictions based on proximity to schools, early years services, and health indicators of the community.

In Australia, there is no single, universally legislated definition of a "fast-food outlet," but the term is widely used and understood across various sectors. In the food service industry, fast-food outlets are typically referred to as Quick Service Restaurants (QSRs). These establishments are characterised by rapid meal preparation, limited table service, standardised menus, and a strong focus on takeaway and delivery. Common examples include McDonald's, KFC, Hungry Jack's, Guzman y Gomez, and Domino's.

From a planning and regulatory perspective, definitions can vary depending on the state or local government. For instance, in Victorian planning schemes, fast-food outlets may be classified under broader categories such as "Takeaway Food Premises" or "Convenience Restaurants." These classifications are based on operational features like hours of operation, drive-thru facilities, and seating arrangements. Local governments may also consider factors such as traffic impact,

signage, and waste management when assessing these businesses.

In commercial real estate and investment contexts, fast-food outlets are often viewed as high-performing retail assets. They typically feature long-term leases, are located in high-traffic areas, and are anchored by nationally recognised brands. These attributes make them attractive to investors and developers alike.

The North Eastern Public Health Unit (NEPHU) definition of a fast-food outlet is *“A place that primarily sells food high in fats, sugars, and salts, such as fast-food restaurants, convenience stores, or takeaway outlets that focus on processed or highly caloric items.”*

Currently, there is also no single, standard definition of a "healthy food outlet" in Australian planning or public health policy. However, several evidence-based frameworks, such as Victoria's *Healthy Choices Guidelines* which rates food outlets using a traffic light model: Green = healthy, Amber = mixed, Red = unhealthy, and the *Healthy Food Retail Toolkit*, and the *RE-FRESH Best Practice Guides*, which all offer a strong foundation for defining such outlets.

A healthy food outlet should be understood as one that:

- **Prioritises affordability** and accessibility of nutritious foods;
- **Offers a wide range of fresh produce and minimally processed items;**
- **Limits the availability and promotion of ultra-processed foods** high in added sugars, saturated fats, and sodium.

Establishing clear, consistent definitions that prioritises affordability, availability of fresh produce, and minimal reliance on ultra-processed foods, would support planning decisions, enable targeted policy interventions, and help create healthier food environments, particularly in communities facing food insecurity or high rates of diet-related illness.

FOOD DESERTS

The concept of food deserts, areas with limited access to affordable, nutritious food, is increasingly relevant in the context of Greater Geelong. These areas often emerge in lower socioeconomic neighbourhoods and are shaped by factors such as low-density suburban sprawl, limited transport options, restrictive zoning

policies, and commercial decisions that deprioritise health equity.

AUO (Australian Urban Observatory) data from our community reveals that most residents live closer to a fast-food outlet (average distance 1,153 metres) than to a healthy food outlet (1,294 metres).

In some areas, such as North Shore, residents are nearly 3 kilometres from the nearest healthy food outlet, while in Newcomb, Whittington, and Norlane, residents live within 900–980 metres of fast-food outlets.

Greater Geelong also has one of the highest densities of takeaway franchises in Victoria, with more than 2.1–2.8 outlets per 10,000 population.

These spatial patterns reflect a broader issue: the food environment is a critical commercial determinant of health. Poor diets, driven by the dominance of ultra-processed foods, are among the leading contributors to preventable disease and health inequity.

Although no Australian state or territory currently enforces a comprehensive ban on fast food outlets within 400–500 metres of schools, early learning centres, parks, or health services, South Australia is at the forefront with a proposed legislative change.

Western Australia has strong community support but lacks enforceable planning controls.

Victoria is now well placed to lead the way by taking this opportunity to embed health and food security in its planning framework, empowering local governments to restrict fast food outlets near sensitive locations, and leverage current legislative reforms to make public health considerations a permanent part of planning.

FOOD AND ADVERTISING

Advertising restrictions work hand-in-hand with planning reforms by reducing the pervasive promotion of unhealthy foods in public spaces, ensuring that efforts to limit fast-food density are reinforced by healthier visual environments that support community wellbeing.

South Australia has taken a landmark step by banning advertising of unhealthy food and drinks across all government-owned public transport infrastructure, including buses, trains, trams, and shelters.

This policy, introduced in July 2025, aims to reduce children’s exposure to marketing for products high in sugar, salt, and fat, such as confectionery, sugary drinks, and fast food, given convincing evidence linking such advertising to poor diets and rising obesity rates. With 63% of adults and 35% of children in South Australia overweight or obese, and obesity now the leading risk factor for disease burden nationally, this measure aligns with the National Obesity Strategy and global best practice.

Victoria faces similar challenges: children see dozens of junk food ads daily, and nearly 60% of food advertising on public transport promotes unhealthy products. Public support is strong, with two-thirds of parents backing restrictions.

Following South Australia’s lead would protect children’s health, create supportive environments, and help reduce long-term healthcare costs associated with diet-related chronic disease.

ACTION REQUIRED

To act and address these challenges, the Victorian Government must revise the VPP to explicitly include health and food security as planning objectives. This should include reclassifying drive-through convenience outlets to require planning permits in all zones, enabling local governments to assess proposals based on health, equity, and land use considerations. Additionally, planning guidelines should be developed to support local government in limiting the density of unhealthy food outlets, promoting access to healthy food, and aligning planning decisions with public health objectives. These reforms must be informed by local data, community engagement, and a commitment to addressing the structural drivers of food insecurity and diet-related disease.

We strongly support the inclusion of health and food security as explicit objectives in the Planning and Environment Act 1987. This aligns with the Food and Agriculture Organisation (FAO) of the United Nations’ High-Level Panel of Experts, which affirms that access to healthy, affordable food is a fundamental human right. The FAO also highlights the “Right to the City,” underscoring the responsibility of governments to ensure that urban environments are designed to guarantee equitable food access for all residents, particularly those in marginalised communities. Enabling local government to:

- **Refuse applications** for new fast-food outlets based on public health grounds.
- **Assess cumulative impacts** of fast-food density in local areas.
- **Prioritise land use** that supports healthy, liveable communities.

ROLE OF LOCAL GOVERNMENT

In closing we wish to highlight the role of local government and the need for support to deliver on the overarching intent of Recommendation 24.

Health Impact Assessments (HIA) in Victoria are systematic processes that evaluate the potential health effects of policies, programs, or projects on the population. They aim to predict both the positive and negative direct and indirect impacts on human health

Dedicated funding is essential for local governments to conduct Health Impact Assessments (HIAs) on planning applications involving food retail because these assessments ensure that development decisions support public health objectives rather than undermine them.

HIAs provide a structured, evidence-based process to evaluate how proposed food retail developments influence access to healthy food, dietary behaviours, and long-term health outcomes. Without funding, local government often lack the capacity, expertise, and resources to integrate health considerations into planning, leading to environments dominated by unhealthy food outlets that contribute to diet-related chronic disease.

This approach aligns with the Victorian Public Health and Wellbeing Plan and international best practice, which recognise the planning system as a critical lever for creating healthier communities. Investing in HIAs enables local government to make informed decisions that prioritise health equity and prevent future healthcare costs associated with poor nutrition.

By embedding health and food security into the planning system, the Victorian Government has an opportunity to lead nationally in creating healthier, more equitable, and more resilient communities. The City of Greater Geelong stands ready to collaborate with the State Government, First Peoples, and communities experiencing food insecurity to ensure that planning reforms deliver meaningful and lasting public health benefits.

We therefore put forward the following recommendations for consideration by the Victorian Government when finalising the governments response to Recommendation 24.

RECOMMENDATIONS

1. Strengthen Collaboration and Evidence-Based Reform

- Consult with local governments to co-design planning reforms that reflect on-the-ground realities, health data, and community needs.
- Use local health and spatial data (e.g. AUO data) to identify food deserts and areas of unhealthy food outlet saturation, ensuring reforms are targeted and equitable.

2. Establish Consistent and Evidence-Based Definitions

- Adopt consistent definitions of *fast-food outlets* and *healthy food outlets* across all planning instruments.

3. Introduce State-Wide Public Health Protections

- Ban unhealthy food advertising across all public transport infrastructure.
- Prohibit fast food outlets from being located within a defined proximity (e.g. 400–500m) of Schools, Early learning centres, Parks and playgrounds and Health and community services.

4. Embed Health and Food Security in Planning Schemes

- Revise the VPP and planning schemes to include *health and food security* as explicit planning objectives.

5. Reform Zoning and Permit Requirements

- Amend zoning regulations to give local government greater control over fast-food developments:
 - Require planning permits for all fast-food outlets, regardless of zone.
 - Impose proximity restrictions to sensitive land uses (e.g. schools, health services).
 - Mandate density assessments to prevent clustering of unhealthy food outlets in vulnerable areas.

6. Implement a Food Retail Classification System

- Develop a state-wide food outlet classification system, and use this system to:
 - Incentivise healthy food retailers through streamlined approvals or financial support.
 - Restrict or regulate fast food outlets in areas with poor health indicators or high outlet density.

7. Support Local Government Capacity

- Provide dedicated funding for local government to conduct health impact assessments for planning applications involving food retail.

PROPOSED AMENDMENTS TO THE PLANNING AND ENVIRONMENT ACT 1987 (VIC)

1. Section 6 – Planning Scheme Provisions

- **Amend Section 6(2)** to explicitly allow planning schemes to regulate or prohibit food outlets based on public health and nutrition.

Insert new clause:

“A planning scheme may include provisions that regulate or prohibit the use or development of land for the purpose of food outlets, including, but not limited to fast food outlets, where such regulation is justified by public health or community nutrition objectives.”

2. Sections 47–62 – Permits and Decision-Making

- **Amend Section 60** to require consideration of *public health* and *community nutrition impacts* in permit decisions:

“In deciding on an application for a permit, the responsible authority must consider the public health impacts and community nutrition impacts of the proposed use or development.”

- **Amend Section 62** to allow permit conditions that limit the type, hours, or density of fast-food outlets based on health objectives.

3. Sections 4A–4B, 12A – Ministerial Directions and VPPs

- Amend the VPP to include overlays or schedules that regulate food outlet density and type.

- Issue a Ministerial Direction requiring planning authorities to consider health and nutrition impacts in scheme amendments and permit decisions.

4. Section 7 – Local Provisions and Municipal Strategic Statements

- Clarify that local governments have the authority to include specific controls on fast-food outlets in their local provisions, based on local health and nutrition data.

5. Section 173 – Agreements

- Encourage or require councils to use **Section 173** Agreements to restrict fast-food outlets in sensitive areas:

“A responsible authority may enter into an agreement under Section 173 to restrict the establishment or operation of food outlets, including fast food outlets, in areas identified as sensitive for public health or community nutrition.”

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Enquiries: Taelyn Craig – 9217 2170

2 November 2025

Dr. Nick Rose
Executive Director of Sustain
233 Tyler Street
Preston VIC 3072

Dear Nick,

Thank you for the opportunity to join Sustain and other local government stakeholders in expressing our disappointment with the Victorian Government response to the Parliamentary Inquiry into Food Security in Victoria, tabled in July 2025.

We write to convey our concern with the increase in planning permit applications for drive-through convenience restaurants (fast food outlets) in the City of Whittlesea, a growth area municipality. Alongside residential development, community infrastructure and other services; access to healthy food options is essential for the wellbeing of new communities.

Council officers at the City of Whittlesea are increasingly concerned that in lieu of healthy and fresh options, these uses are commonly located within town centres or in proximity to sensitive land uses such as schools or child care centres and erode walkability and urban amenity within town centre walkable catchments. The prevalence of these land uses at the expense of healthy food options has a negative impact on public health outcomes for these new communities. This scale of development of drive-through convenience restaurants results in higher densities of unhealthy food options in growth areas.

We are calling for the strengthening of the Victoria Planning Provisions (VPP) to support local government efforts to provide for healthier, walkable communities.

Health Impacts

In the City of Whittlesea:

- **57.5%** of residents are classified as overweight or obese, according to self-reported health data ([VPHS 2023](#)).
- **28%** of young people in Years 5, 8 and 11 in the North Eastern Melbourne region recorded a Body Mass Index (BMI) in the overweight or obese range ([NEPHU 2025](#)).
- **43%** of community respondents consume fast food at least once a week with this being even higher in the growth northern corridor at **48%** (*Council's Community Insights Survey*).

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- The average distance to a supermarket is **1.43km** in Whittlesea and only **33.8%** of dwellings are within 1km of a supermarket. (NEPHU Food Environment Map Project).

Recommendation 24 of the Parliamentary Inquiry into Food Security is *'that the Victorian Government revise the Victorian planning provisions (Planning and Environment Act 1987) to include health and food security as an objective when local governments and other planning authorities are making planning decisions'*. It is now common for the construction of these fast-food retailers in growth area suburbs to occur years before a supermarket is constructed to provide options for local access to fresh, healthy food. In many instances, there is a proliferation of multiple drive-through convenience restaurants in the one location. While offering multiple food options, these are not healthy and fresh options. Their presence as the dominant food retailer in the absence of a fresh food retailer reduces suitable and convenient alternatives for healthy food access.

Design and Built Form Outcomes

In the City of Whittlesea, the average distance to the closest healthy food outlet is 1.43km and only 33.8% of dwellings are within 1km of a supermarket (NEPHU Food Environment Map Project).

The introduction of car-reliant land uses compromises the built form quality and design intent of town centres. Drive-through developments reduce walkability, both within the site and providing access around the site. These developments prioritise vehicle movement over pedestrian movement, undermining strategic plans which envision a walkable community and a 20-minute neighbourhood. Town centres and other commercial places are intentionally planned to be located within areas of walkability, serving a community where dwellings are at increased densities.

Much of the growth areas of Whittlesea are within the Urban Growth Zone, and subject to Precinct Structure Plans, directing intended land use outcomes. Predominantly the intended land use is residential, with some commercial designation provided. Commonly Local Convenience Centres, intended to provide a small-scale walkable commercial precincts for local needs, are dominated by applications for drive-through convenience restaurants due to their relatively cheap construction costs and high returns on investment.

Despite endorsed strategic plans envisioning walkable, mixed-use town centres, local government planners are often powerless to avoid the spread of convenience restaurant uses due to the zoning measures in place. Current planning scheme controls often designate these sites as applied Commercial 1 Zones. As convenience restaurants are nested within the Retail Premises land use, this will mean the use is Section 1 (as-of-right) and no planning permission for the use is required. This limits Councils assessment of planning permit applications and planners then have minimal ability to refuse these applications.

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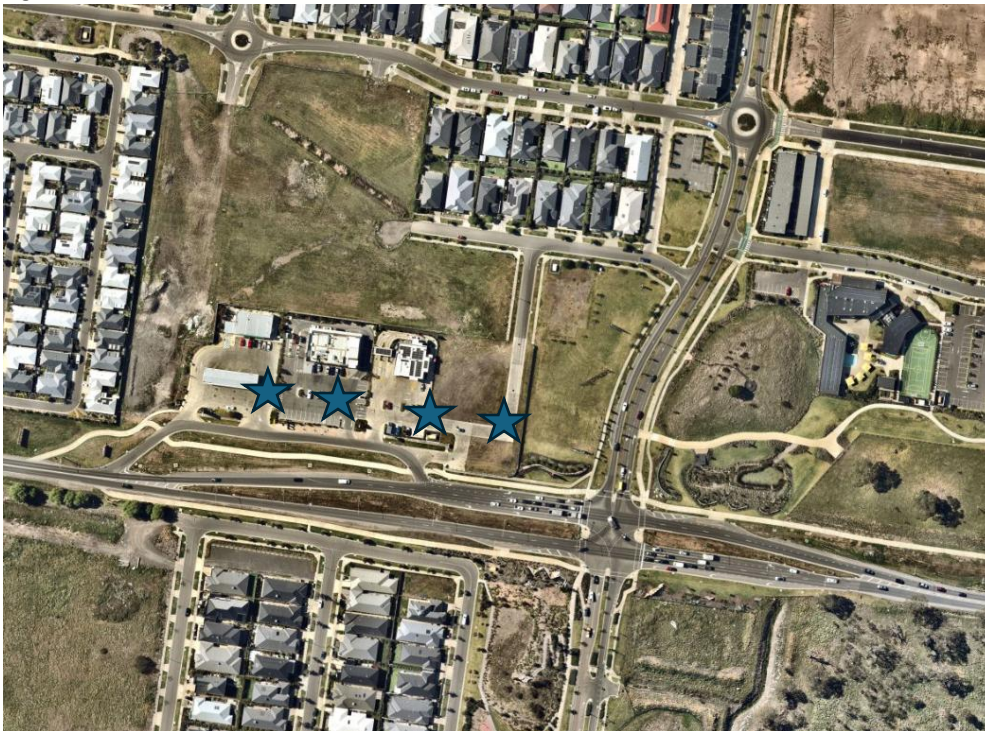
Co-location

Proposals for drive-through convenience restaurants often dominate in locations of community services due to proximity to town centres. This has led to less-than-ideal co-location outcomes with drive-through convenience restaurants co-located with sensitive uses such as child care centres and community infrastructure. While decision-makers are strengthened by state and local policy for sensitive land uses aiming to avoid such co-location, decision-making is weakened by as-of-right land use zoning, thereby limiting the scope of assessment to the buildings rather than the land use.

Case Study 1: Convenience restaurants intentionally delivered by estate developers as first retail offering

Rathdowne Estate Wollert: 5, 9, 13, 17 Symphony Lane Wollert (refer Figure 1).

Figure 1:



L-R BP Service Station, McDonalds, KFC, and on the vacant lot, approval for four additional convenience restaurants, three with drive through facilities.

The Wollert Precinct Structure Plan locates the sites within the walkable catchment for the Southwest Local Town Centre (400 metres), designating them residential. This means that the applied zone is Residential Growth Zone (refer Figure 2).

The Residential Growth Zone seeks to provide housing at increased densities in buildings up to and including four storey buildings. It seeks to allow a limited range of non-residential uses to serve local community needs in appropriate locations.

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A convenience restaurant is a Section 2 use (requires a planning permit) in the Residential Growth Zone and must have access to a Transport 2 or Transport 3 Zone. In this instance, the convenience restaurants have access to Craigieburn Road, an arterial road.

A planning permit for other retail options within the Southwest Local Town Centre, including the intention to deliver a supermarket, was approved in early 2021. To date, this retail development has not been delivered.

The Rathdowne Estate Masterplan indicates that the convenience restaurant development was an intentional outcome for the developer Villawood, and that it would be directly adjacent to residential properties (refer Figure 3).

The service road for the uses conflicts in two locations with a shared path, and at five or more locations conflicts with a footpath. The streetscape appears severely impacted by works (refer Figure 1).

For residents currently living within this walkable catchment, the nearest supermarket or retail centre with healthier or fresh food options is currently:

- 4 Seeds Café (breakfast and lunch only), 2 Bank Street, Wollert – 50 to 400 metres
- Coles Aurora Village, 315a Harvest Home Road Epping (Coles and specialty retail) – 3.9 km
- Craigieburn Plaza corner Craigieburn Rd West and Hanson St, Craigieburn (Woolworths and specialty retail) – 6.8 km
- Epping North Shopping Centre, Cnr Epping Rd and Lyndarum Avenue (Woolworths and specialty retail) – 7 km
- Mernda Village Shopping Centre, 59 Mernda Village Drive Mernda (Woolworths and specialty retail) – 11.3 km.

Figure 2:



Wollert PSP Future Urban Structure, and approximate location of Symphony Lane commercial development (star). The purple colour is the future Southwest Local Town Centre location.

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Figure 3:



Rathdowne Masterplan: blue star indicates the Symphony Lane development: [Rathdowne | Find & Buy your dream lot | Interactive Masterplan](#)

Case Study 2: Co-location of drive-through convenience restaurants with sensitive land uses
940 Bridge Inn Road and 20B Yellow Brick Road Doreen (refer Figure 4)

Figure 4:



Combination of a drive-through convenience restaurant (McDonalds) and childcare centre.

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The *Garden Road Development Plan* designated the site for “potential non-residential uses” and is within a Mixed Use Zone (MUZ).

The use of a convenience restaurant is a Section 1 (as-of-right) use in a Mixed Use Zone, provided a number of conditions are met. The use of a child care centre is a Section 2 use. As shown in Figure 4, a combination of a convenience restaurant and child care centre has occurred with the children’ play space abutting the drive-through component of the convenience restaurant. During the assessment of these applications, there was a distinct lack of policy to prevent a mix of incompatible land uses which led to the eventual construction.

City of Whittlesea would later amend local policy for child care centres (Clause 19.02-2L - Amendment C223) to discourage incompatible land uses such as drive-through convenience restaurants, allowing greater bargaining power for Whittlesea to avoid sensitive land uses being located within proximity of land uses with off-site impacts such as high-traffic volumes, idling vehicles, associated pollution concerns, poorer health outcomes and reduced walkability.

Conclusion

In a Whittlesea context, there has been an increase in the number of drive-through convenience restaurant planning permit applications, particularly in the growth areas. Whittlesea’s population data places Donnybrook’s current population at 12,614. With a recent permit issued for three, co-located convenience restaurants, this would leave a density of one fast food outlet per 4204 people and no supermarket. Wollert has a current population of 36,936 people, with seven drive-through convenience restaurants approved in the Wollert Precinct Structure Plan area alone. Whittlesea has also seen an increase in the number of pre-application requests lodged for drive-through convenience restaurant uses.

The Victorian State Government should consider changes to the Victorian Planning Provisions (VPP) to allow local governments to have greater flexibility in the control of convenience restaurants. Specifically, City of Whittlesea seeks the following reforms to the VPP :

- Include health and food security as an objective when local governments and other planning authorities are making planning decisions.
- Amend zoning provisions to remove the convenience restaurant land use from Section 1 uses in some instances or include more conditions to be met to qualify as a Section 1 use, or alternatively amend Clause 73.04 (Nesting diagrams) to exclude Convenience Restaurants nested under Retail Premises.
- Require greater alignment with strategic plans in relation to built form and walkability objectives when assessing drive through convenience restaurants.
- Place stronger urban design assessment criteria on applications at key strategic areas, such as corner sites, sites within activity centres / town centres of Precinct Structure Plans or in proximity to train stations.

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- Require the further assessment and consideration of current convenience restaurant densities in the area to avoid a proliferation of such uses in the one area.
- Enable councils to refuse applications where they are deemed inappropriate due to proximity to schools, early learning centres and community facilities, while still balancing the demand and understanding that these are valid land uses throughout metropolitan Melbourne.

There is a role for drive-through convenience retail in our growing communities and we must be realistic about the demand for these uses. However, with the VPPs in their current form, growth area councils have limited negotiation ability and as such, these uses continue to expand unchecked and at the expense of healthier food options, public health, walkability and rational planning outcomes.

The City of Whittlesea would welcome the opportunity to work with state government and Sustain on any VPP review relating to recommendation 24 of the Parliamentary Inquiry into Food Security and work towards prioritising healthy food choices, walkability, positive urban design outcomes, and appropriate location of uses for our community.

Yours sincerely,



Liam Wilkinson
Manager Strategic Futures

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5 November 2025

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PO BOX 70
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Dear Nick

Re: Brimbank City Council's response to Parliamentary Inquiry into food security in Victoria

Brimbank City Council welcomes the opportunity to provide further feedback via Sustain in conjunction with other stakeholders to the Victorian Government's response to recommendation 24 of the Parliamentary Inquiry into Food Security in Victoria.

Council is supportive of the Victorian Government's review of the Planning Provisions to incorporate health and food security objectives, as it aligns with the goal of improving access to safe, nutritious, and healthy food for all Victorians.

We recognise the importance of this initiative but also anticipate significant challenges in implementing meaningful change through planning mechanisms alone.

There are anticipated difficulties in defining and differentiating "healthy" versus "unhealthy" or fast food outlets within the planning system. Current land use definitions, such as 'convenience restaurant,' are broad and may inadvertently include small businesses or cafés that provide healthy food options, potentially creating grey areas that undermine the intended outcomes. There is also a risk that businesses may adapt to any restrictions, for example by offering drive-through alternatives or delivery-to-car services, circumventing the intent of the reforms.

Previous experience with cumulative impact assessments for licensed premises suggests that similar measures for fast food outlets may not achieve the desired effect. With this in mind, it's fair to expect that local government would have limited capacity to enforce these types of regulations without broader systemic reform.

There are however potential opportunities to link food security objectives with transport and urban planning initiatives. For instance, improving access to healthy food could be tied to enhancing local transport networks, cycling paths, bus routes, and adopting 'living locally' principles outlined in *Plan for Victoria* such as the formerly adopted 20-minute neighbourhood model. Many councils are already actively working on transport-related projects, such as integrated transport strategies, car-share programs, and advocacy for

new rail infrastructure, which could complement the objectives of the Planning Provisions review.

To maximise impact, any reforms to the Planning Provisions should clearly define food categories, distinguish between traditional fast food and healthy small businesses, and align with broader state transport and urban planning initiatives. Sector-wide consultation and complementary policy measures may be necessary to ensure that any changes lead to tangible improvements in food security and public health outcomes.

Whilst Council supports the aspirations of the reform, realistic expectations about the limitations of planning tools should be acknowledged, and more substantial reforms supported by sector-wide consultation may be required to effect meaningful change.

Thank you again for the opportunity to contribute to Sustain's submission to the Victorian Government. If you have any questions please contact Jacinta Martin, Health and Wellbeing Policy Officer, jacintam@brimbank.vic.gov.au.

Yours sincerely



Wambui Thirimu
Acting Manager Community Strengthening & Social Planning