



Coffs Harbour Greens
Coffs Harbour
NSW 2456

11/08/2020

DA Ref Number: 0810/20DA

Dear Coffs Harbour Council

On behalf of the Coffs Harbour Greens, I wish to object to the current plans by McDonald's Australia Limited C/- KDC Pty Ltd to establish a 24/7 food and drink premises at Toormina Gardens, Toormina.

We base our objection on the view that this project can **not** be sufficiently considered to be in the public interest due to:

- Unhealthy competitive advantage
- The problems associated with a 24-hour licence
- Undesirable health outcomes
- Meaningless Litter Program

Unhealthy competitive advantage

The apparent purpose of a McDonalds franchise in the proposed location is seemingly to monopolise food and drink premises at the expense of other operators. A McDonalds already exists within 5 km of the planned Toormina development that provides competition with a range of other 'fast food' outlets. Dominating the fast food market in southern area of Coffs Harbour seems a tactic of the transnational corporation that will create less on-going trade for existing or new businesses.

How is council planning to make sure that this new premises will not penalise existing operators providing an unhealthy market share?

The problems associated with a 24-hour licence

We can not support the application for a 24-hour licence to be granted to this McDonald's establishment. We have been contacted by members of the Toormina community

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concerned about the serious impacts associated with a premises that operates through the night.

Coffs Harbour is not a large urban environment whereby human activity is dependent on late night eateries. In major cities of Australia, however, this seems like a suitable match where night economies are the norm.

It is not apparent that the same community needs exist in Toormina. The proposer, KDC Pty Ltd, have not specified who their target market is for the late night trade. Online research identifies the assumption that a 24-hour McDonald's premises benefits people on road trips or people who work early so they can have a hot, fast, and cheap meal when no other restaurants are open. We believe these customer needs can be met at the South Coffs Service Centre, which operates 24-hours 7 days a week and is within 4.9 kilometres of the Toormina Gardens complex.¹

According to the DA documents, the proposers have made considerable effort to prove they have met other concerns such as night security. However, the risks to nearby community residents must be considered in approving a 24 hour premises.

Last year, MidCoast Council limited McDonald's application to drive-through only siting concerns about loitering and anti-social behaviour.

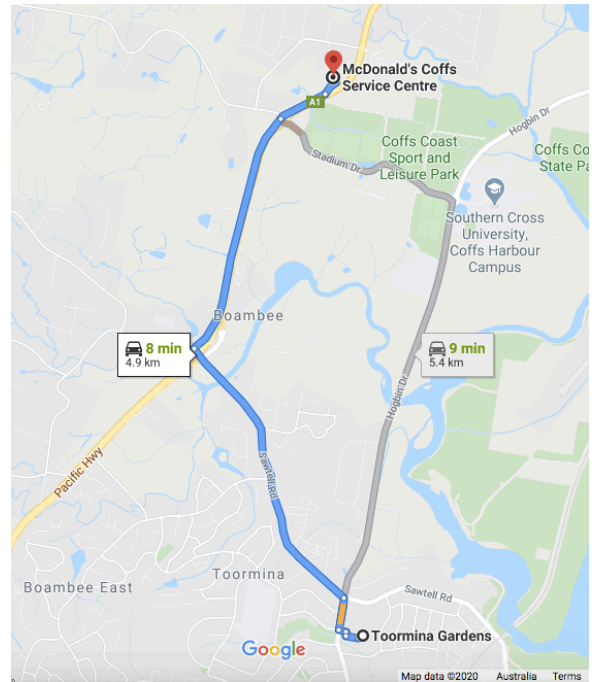
A specialist security guard will also be required between the hours of 11pm and 6am to "provide static and mobile patrols of the premises in an attempt to reduce loitering, anti-social behaviour and crime opportunities in the vicinity of the premises."²

The NSW Police also objected to the proposal, stating that 'late trading outlets were often the sites of violence, vandalism, loitering, noise complaints and other anti-social behaviour.'

In 2011, the Swansea McDonald's withdrew an earlier application for extended trading hours due to public outcry over anti-social behaviour concerns:

¹ <https://mcdonalds.com.au/find-us/restaurants?qstore=2450>

² <https://www.manningrivertimes.com.au/story/6558004/green-light-given-to-24-hour-drive-thru-at-mcdonalds-forster/>





Residents and businesses are unhappy at antisocial behaviour at and around the restaurant. A submission to the council said youths vandalised fences, gardens and letterboxes "on their way to and from McDonald's".

Security lights and windows were regularly smashed, outdoor furniture damaged and stolen and vehicles broken into and vandalised.

Other residents lamented a lack of police in the area and large amounts of McDonald's' rubbish. Speeding cars "entering and leaving McDonald's at all hours with horns blowing", burnouts and noisy patrons were problems.

Residents also experienced "extensive tyre and exhaust noise from vehicles coming and going from McDonald's".³

We, therefore, can not support a 24-hour licence being granted to this DA as it stands because of the likely risks to our community and the availability of a 24-hour premises already at South Coffs Service Centre.

Undesirable health outcomes

According to the Australian government, a 2017 report into a picture of overweight and obesity in Australia found that:

Obesity in Australia is a major public health issue that has significant health and financial costs. Almost one-quarter of children and two-thirds of adults are overweight or obese, and rates continue to rise, largely due to a rise in obesity, which cost the economy \$8.6 billion in 2011–12.⁴

The report highlights factors that lead to obesity are a complex interplay between environment, social and personal factors. It recognises that food and nutrition play a key role in both leading to obesity but also foods that lead to better health outcomes. It directly states that foods high in sugar, salt and fat lead to worse health outcomes.

Excessive energy intake from foods and drinks can contribute to energy imbalance and weight gain, leading to overweight and obesity. Energy-dense foods can encourage energy intake that exceeds requirements (NHMRC 2013a). These include foods high in fat and/or sugar. For example, in the United States of America, there is strong evidence associating greater intake of sugar-sweetened drinks with higher body fat among children, and higher body weight among adults (NHMRC 2013a).

³ <https://www.newcastleherald.com.au/story/470352/fresh-late-night-claims-in-fast-food-fight/?cs=305>

⁴ <https://www.aihw.gov.au/reports/overweight-obesity/a-picture-of-overweight-and-obesity-in-australia/data>

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Foods that McDonalds produce are high in sugar, salt and fat and a World Health Organisation report in 2006 found there is a causal link between food marketing and obesity.⁵ Further, the convenience and low-cost of McDonalds foods make it harder for uneducated and low-socioeconomic people to dismiss. This leads to a cycle of worsening health outcomes for people who are levelled with the personal responsibility to manage their diets.

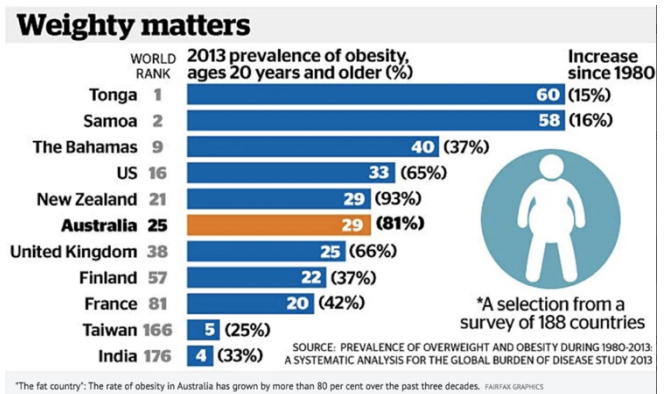
There is a famous, sophisticated and indirect branding appeal used by McDonalds. It's marketing strategies are, however questionable. McDonalds advertises and markets itself as benevolent in order to build its public relations, whilst selling unhealthy food. McDonalds has been accused of using classical conditioning tactics that 'frames itself as a facilitator through which community can gather.'⁶

The prestigious scientific journal *The Lancet* in 2018 considered the fast rise of the obesity epidemic in the US since the 1970's and linked it to several environmental factors including:

US farm bills in the 1970s, which led to a rapid increase in food production and thus an increase in food portion sizes; accelerated marketing, availability, and affordability of energy dense foods; and widespread introduction of cheap and potent sweetening agents, such as high-fructose corn syrup, which infiltrated the food system and affected the whole population simultaneously.⁷

In Australia, the obesity epidemic is not that dissimilar when compared to the US. In 2014, Australia ranked 25th out of 188 countries and Fairfax media at that time called us the fat country claiming the rate of obesity in Australia has grown by more than 80% over the past three decades.⁸

We are not convinced this McDonald's franchise meets our community needs for health and well being. We call on council to intervene in environmental, social and individual factors that determine consumer behaviour through initiatives that empower the public towards healthy food choices.



⁵ https://www.who.int/dietphysicalactivity/publications/Hastings_paper_marketing.pdf

⁶ <https://theconversation.com/mcdonalds-is-a-social-and-healthcare-burden-whatever-its-charity-pr-might-indicate-105627>

⁷ [https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667\(18\)30021-5/fulltext](https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667(18)30021-5/fulltext)

⁸ <https://www.smh.com.au/lifestyle/obesity-rates-soar-in-australia-a-global-survey-reveals-20140528-394s4.html>



Meaningless Litter Program

We are not convinced McDonalds can responsibly manage its litter stream. The waste management document supplied seems to fail to acceptably address the waste from its products entering stormwater drains or surrounding suburban or vegetated areas.

The main problem is that packaging is not biodegradable so when discarded in the urban environment it persists indefinitely and ultimately ends up in the coastal environment. We are concerned that McDonalds staff will not adequately 'patrol rubbish' in the near vicinity particularly over the lifespan of the business. Further, will staff patrol as far as the Toormina skate park which would be a significant area of pollution or the minor water course adjacent to the proposed development?

The suggestion by McDonald's to install litter traps to help manage storm water pollution in the car park seems fraught with failure. How will these 'traps' prevent McDonalds straws or other small and broken plastic pieces from being washed into the storm drainage?

We would like to see in any consent for development conditions that McDonald's provides innovative incentives for waste elimination and reduction, such as packaging deposit scheme or offering sit-down customers washable dinnerware such as was attempted in Newcastle in 1998⁹.

The multi-million-dollar construction and development of this site ignores the externalisation costs associated with long term health and community impacts dependent with a company whose market share is 50% of the fast food industry.

In light of our concerns, it seems that ultimate responsibility for littering falls to council. The duty for patrolling McDonald's staff and waste as a result of this premises would appear to fall back to council's waste services. Those community members who demand fast food and fail to correctly dispose of their waste must be anticipated. Will council develop waste programs at ratepayer or business costs that significantly reduce litter in our environment?

Waste recommendations

- Can council audit the site prior to development with following audits every 6 months?
- Can a waste strategy be designed with baseline information and waste minimisation goals?
- Can council adopt a paid street cleaning program for homeless people. This has been pioneered in the US city of Los Angeles under the Clean Streets LA Initiative.¹⁰

⁹ <https://www.ukessays.com/essays/marketing/life-cycle-assessment.php>

¹⁰ https://clkrep.lacity.org/onlinedocs/2017/17-1121_mot_09-29-2017.pdf



Conclusion

We can not support this development as it stands because:

1. Its market share dominates other food and drink premises giving McDonald's an unfair competitive advantage in the Toormina area.
2. The 24-hour trading will likely increase anti-social behaviour in Toormina leading to a drain on police resources and impacts to nearby residents.
3. Obesity is a major health problem facing Australian policy makers and fast food is a significant contributor to this crisis. We would like to see council intervene in social, individual and environmental factors that influence consumer behaviour.
4. McDonald's waste strategy is misleading and does not suitably satisfy our concerns for packaging waste. Council must accept greater responsibility in managing environmental risks associated with this and future fast food development.

Please consider our concerns seriously.

Kind regards,

Jonathan Cassell

Coffs Harbour Greens Convener