

Planning Department

Wodonga City Council

PO Box 923

Wodonga VIC 3690

Monday 9 August 2021

Subject: Opposition to application for liquor license: 73/2021, ELGIN BOULEVARD WODONGA

To whom it may concern,

I am writing to you on behalf of Women's Health Goulburn North East (WHGNE), the regional women's health service for north-east Victoria and the Goulburn Valley, to object to the application for a liquor license and permit for a 'bottle shop' to sell packaged liquor at the site (Corner of Elgin Boulevard and Smythe Street, Wodonga). It should be made clear that Women's Health Goulburn North East does not oppose the development of the vacant site at Elgin Boulevard and Smythe Street in Wodonga however, we oppose that the proposed retail premises include concessions for the sale of packaged alcohol products.

Women's Health Goulburn North East utilises evidence-based primary prevention and health promotion approaches to address the root causes of health and gender inequalities, and gender-based violence in northeast Victoria and the Goulburn Valley. Health promotion is 'the process of enabling people to increase control over, and to improve, their health¹'.

The work that WHGNE leads goes beyond individual prevention efforts, instead taking a contemporary health promotion approach that aims to address the social, physical or structural barriers that women and gender-diverse people face when accessing opportunities to enhance their health and wellbeing – whether that be access to health services, public goods or evidence-based information. We work to understand the unique needs of sub-groups within the populations we work with, to ensure that health initiatives continue to serve our most marginalised community members.

WHGNE's prevention work fits within the context of a number of existing State, Federal and International frameworks including:

¹ World Health Organisation (WHO) 1986, [Ottawa Charter for Health Promotion](#), Geneva.

- [Victorian Public Health and Wellbeing Plan 2019 – 2023](#);
- [Free from violence: Victoria's strategy to prevent family violence](#)
- [National Preventive Health Strategy](#) (currently in draft)
- [Ottawa Charter for Health Promotion 1986](#)
- [Universal Declaration of Human Rights](#)

Health promotion practice and advocacy work sits within a spectrum. The Spectrum of Prevention identifies six levels of intervention and helps move people beyond the perception that prevention is merely education². As part of our prevention work, WHGNE has a key role in advocating for and influencing policy and legislation at the local, state and national levels, and in supporting our partner organisations to transform their organisational practices.

Spectrum of Prevention



Figure 1: The Spectrum of Prevention

Source: <https://www.preventioninstitute.org/tools/spectrum-prevention-0>

Women’s Health Goulburn North East’s purpose is outlined in our [Strategic Plan 2021-25](#):

*‘We are a feminist organisation leading change towards gender equality **to improve women’s health, wellbeing and safety in rural and regional Victoria**’.*

Additionally, as outlined in WHGNE’s [Strategic Plan 2021-25](#), we work to address ‘structural inequities, with the understanding that what benefits women at the margins, benefits all members of the community’. Our impact areas include gender justice – including enabling equitable health and wellbeing outcomes for women in the region – sexual and reproductive health rights, and climate justice. We are committed to addressing the social and structural inequities that contribute to poor mental health and increased family violence for women in our region.

It is for the reasons outlined here that we acknowledge our responsibility to women and gender-diverse people in the community of Wodonga in objecting to the allocation of liquor licensing

² Prevention Institute n.d., *The Spectrum of Prevention*, <https://www.preventioninstitute.org/tools/spectrum-prevention-0>.

permits as per the application for planning permits currently before Council (73/2021 ELGIN BOULEVARD).

The ease of access to drugs and alcohol, as well as the normalised drinking culture in Wodonga, has led to an unprecedented growth in drug and alcohol fuelled crime and violence³. In the most recent Victorian Population Health Survey to disaggregate data for each of Victoria's 79 local government areas (LGA), it was found that 73 per cent of people in Wodonga are at increased lifetime risk of alcohol related harm compared to only 59 per cent of all Victorians⁴. This has increased from 71 per cent in the 2015 Victorian Population Health Survey⁵.

Contributors to harmful alcohol and drug use in Wodonga include:

- A strong drinking culture in Wodonga. People in Wodonga drink alcohol at a higher rate when compared to their Victorian peers and spend slightly more on alcohol. Drinking at risky levels is considered the norm³.
- People can easily access alcohol throughout the city. The average distance from home to an alcohol outlet in Wodonga is 2.3km, compared to 10.1km in the region³.

It is important to consider Wodonga's drinking culture in the context of the COVID-19 pandemic. In a comprehensive survey of 2,000 Victorians in the first COVID-19 lockdown in 2020, VicHealth found that feeling anxious or stressed may have increased alcohol intake⁶. Interestingly, this survey also found that the risk of long-term harm from alcohol consumption was more likely among people from bushfire affected areas and those facing loss of income or employment⁶. Factors that led to increased consumption of alcohol during lockdown restrictions included boredom and increased stress and anxiety⁶.

In a recent research paper from The Lancet Regional Health that sought to investigate changes in alcohol intoxication-related ambulance attendances during COVID-19, it was found that attendances to the home increased by nine per cent in 2020. The highest changes were seen among those experiencing increased socioeconomic disadvantage⁷.

'Reducing harmful alcohol and drug use' is one of five top health and wellbeing priorities for Wodonga City Council, as outlined within the City of Wodonga [Council Plan 2021-2025](#). In this plan, Council has identified a number of strategic priorities to respond to community need and progress sustainable growth. Within the strategic priority 'Healthy Safe and Resilient Community' Council has committed to the following actions that WHGNE sees as relevant to this planning application:

- Ensure gender equality and equity is embedded in council policy and decision-making;
- advocate for and promote the prevention of all forms of violence;
- advocate for regional and local services and programs that support the reduction of alcohol and drug abuse; and

³ Wodonga City Council 2016, [No one left behind: Safety, inclusion and equity strategy 2016-2017 to 2021-2022](#), Wodonga.

⁴ Victorian Department of Health 2017, [Victorian Population Health Survey 2017](#), Melbourne.

⁵ Victorian Department of Health 2015, [Victorian Population Health Survey 2015](#), Melbourne.

⁶ VicHealth 2020, [Coronavirus Victorian Wellbeing Impact Study](#), Report for survey #1, VicHealth, Melbourne.

⁷ Ogeil, R et al 2021, 'Changes in alcohol intoxication-related ambulance attendances during COVID-19: How have government announcements and policies affected ambulance call outs?', *The Lancet Regional Health – Western Pacific*, vol. 14, September 2021, <https://doi.org/10.1016/j.lanwpc.2021.100222>.

- lead, plan and promote environments that support mental health and build community resilience.

'Reducing harm from alcohol and other drugs' also features as a priority area in Wodonga City Council's [Safety, Inclusion and Equity Strategy 2016-2017 to 2021-2022](#). As outlined in this strategy, Council is committed to act on its critical role in planning and design, and licensing and regulation, when working to prevent harm from alcohol and drug use in the city.

WHGNE recommends that Council utilise these mechanisms for action when considering planning applications for bottle shops and alcohol outlets that are presented to Council, and continue to advocate to the Victorian Government to change liquor licensing laws so that the impact of family violence can be considered when assessing applications presented to the Victorian Commission for Gambling and Liquor Regulation (VCGLR).

One of Council's objectives, as outlined in the [Safety, Inclusion and Equity Strategy 2016-2017 to 2021-2022](#) is to utilise Council planning, regulatory and policy mechanisms to reduce alcohol and drug harm. Actions under this objective include:

- Undertake an alcohol outlet mapping exercise across Wodonga; and
- investigate ways for Council to better consider the social and health impacts for all liquor license applications.

WHGNE recommends that Wodonga City Council undertakes this exercise ahead of assessing the application for a packaged liquor retail outlet that is currently before Council, to determine the number of packaged alcohol retailers already operating within the vicinity of Central Wodonga.

WHGNE has a history of working in partnership with Wodonga City Council to progress gender equality in Wodonga, through a number of initiatives working to prevent gender-based and family violence. This includes involvement in Wodonga's Preventing Family Violence Taskforce, alongside Council, Victoria Police, Mungabareena Aboriginal Cooperative, the Department of Education and Training (DET) and the Centre Against Violence (CAV).

Preventing violence against women and children is one of four priority areas outlined in Wodonga City Council's [Safety, Inclusion and Equity Strategy 2016-2017 to 2021-2022](#). **The evidence tells us that the root cause of gender-based violence, including family violence, is gender inequality⁸.**

Gender inequality is where women and men do not have equal social status, power, resources or opportunities, and their voices, ideas and work are not valued equally by society. Gender inequality provides the underlying conditions for gender-based or family violence. It exists at many levels in our society – from how we view men, women and gender-diverse people, to economic factors like the gender pay gap, to family and relationship roles and expectations⁸. Family violence disproportionately effects women⁹.

⁸ Our Watch, ANROWS & VicHealth 2015, [Change the story: A shared framework for the primary prevention of violence against women and their children in Australia](#), Melbourne.

⁹ Australian Institute for Health and Welfare (AIHW) 2018, [Family, domestic and sexual violence in Australia, 2018](#), Australian Government, Canberra.

Out of 79 local government areas in Victoria, Wodonga is ranked 13th for incidence of family violence¹⁰.

Alcohol, or excessive alcohol consumption does not cause family violence, however alcohol and drug use are significant reinforcing factors that can worsen the experience of gender-based violence for individuals and families within our community⁸. In Wodonga, almost half of all family violence incidents involve alcohol or drug use³. In fact, in 2018-2019, Wodonga had a rate of 32.1 incidents of alcohol-fuelled family violence per 10,000 population, close to double that of Victoria's state average of 17.3 per 10,000 population¹¹.

Research shows that higher levels of violence against women where there is a higher density of alcohol outlets in the community¹². In planning application documents submitted to Wodonga City Council, the below graphic illustrates the 5-minute and 10-minute walking radiuses from the proposed site at the corner of Elgin Boulevard and Smythe Street, Wodonga. Within the 5-minute walking radius, there are currently five packaged alcohol retailers and within the 10-minute walking radius, there are an additional two packaged alcohol retailers. A Google search using the terms 'alcohol retail Wodonga' returned 13 results for locations across Wodonga, however a walk through Wodonga's neighbourhoods will reveal additional retailers not listed online.



Figure 2: Site Circulation and Accessibility.

Source: https://www.wodonga.vic.gov.au/Portals/0/Downloads/73_2021_-_Architectural_Plans.pdf.

¹⁰ Crime Statistics Agency 2018, *Family Violence Data Portal*, viewed 5 August 2021, <https://www.crimestatistics.vic.gov.au/family-violence-data-portal>, cited in City of Wodonga 2021, *Council Plan 2021-25*, Wodonga.

¹¹ Turning Point, *AODStats – Victorian alcohol and drug statistics*, viewed 4 August 2021, <https://aodstats.org.au/>.

¹² Phillips, J & Vandenbroek, P 2014, *Domestic, family and sexual violence in Australia: an overview of the issues*, research paper, Parliament of Australia, Canberra.

As outlined in Council's [Safety, Inclusion and Equity Strategy 2016-2017 to 2021-2022](#), Council is committed to 'influencing and encouraging gender equity and the safety of women through Council's culture and practices'. In this strategy, Council has defined key actions in order to contribute to outlined objectives including: 'Ensure land use planning utilises Safer by Design Guidelines and applies a gender equity lens in planning decisions.'

WHGNE recommends that Council apply a gender lens in assessing the impact that an additional liquor retailer will have on women in the community of Wodonga. As identified in this submission, women are at greater risk of harm due to family violence; with this risk increasing for women who experience additional forms of oppression due to race, sexuality, religion, education level, involvement in the workforce, and other factors. In the context of incidences of family violence that are exacerbated by alcohol, this should be at the forefront when considering the application that is currently before Council.

Additionally, Wodonga City Council, as a defined entity under the [Gender Equality Act 2020](#), is obligated to complete a Gender Impact Assessment (GIA) for a policy, program or service that has a direct and significant impact on the community. **WHGNE recommends** that Council's [Wodonga CBA Revitalisation Plan 2014-2034](#) be assessed using the GIA process, to ensure that all current and proposed developments in Wodonga's central district be fully considered using a gender lens, including the potential impact on diverse members of the community.

In closing, Women's Health Goulburn North East encourages Wodonga City Council to deeply consider the recommendations presented in this letter. These recommendations ultimately lead to the rejection of the application for a liquor license for the sale of packaged liquor as per planning application **73/2021, ELGIN BOULEVARD WODONGA**.

WHGNE is prepared to provide support and guidance for Wodonga City Council, in particular, through the application of gender transformative practices to planning, program delivery and services. For more information, or to further explore the recommendations outlined in this letter, please contact Women's Health Goulburn North East on whealth@whealth.com.au or 03 5722 3009.

In solidarity,

Melissa Rowland

Health Promotion Officer and Wodonga Resident.