

30 June 2011

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The Secretary
Legislative Council Environment and Planning Committee
Parliament House
Spring Street
Melbourne VIC 3002

By email: keir.delaney@parliament.vic.gov.au

Dear Secretary,

Inquiry into Environmental Design and Public Health

The Alcohol Policy Coalition (APC) is a collaboration of health agencies—Australian Drug Foundation, Cancer Council Victoria, Heart Foundation of Victoria, Turning Point Alcohol and Drug Centre and VicHealth—with shared concern relating to the misuse of alcohol and its health and social impacts on the community.

The APC's long-term goal is to reduce the negative health and social impact of alcohol, promote a safer community drinking culture and improve the health of all Australians.

We welcome the broad terms of reference for this inquiry, including a commitment to review the evidence regarding the contribution of the environment to public health and well being, evaluate the current approach to environmental design and planning in Victoria and determine opportunities to influence environmental design and planning for health.

The APC has a particular concern regarding the physical availability of alcohol in Victoria because it corresponds with alcohol-related harm. The estimated social cost of alcohol-related harm in Victoria is almost \$4.3 billion, \$530 million of which is incurred through healthcare costs.¹

Over the last two decades, the number of packaged liquor outlets in Victoria has more than doubled, and state-wide studies have shown that increased packaged liquor density is linked with:

- rates of violence;
- high-risk drinking; and
- alcohol-related chronic disease.

A copy of the APC's position statement in relation to the physical availability of alcohol is enclosed with this letter.

While alcohol availability is primarily regulated by the *Liquor Control Reform Act 1998* (Vic), the APC also recognises that reducing alcohol-related harm through altering the physical drinking environment is an issue that can be addressed more broadly within government. This approach should include planning legislation and policy that is sensitive to the impact of alcohol availability in Victoria.

¹ Department of Justice (Victoria), *Liquor Control Reform Regulations: Regulatory Impact Statement* (2009) 15

Accordingly, we commend to the Committee the submission made by APC member organisation VicHealth, and in particular recommendation 3 which states that:

In order to create a healthy urban environment, planning regulations need to take into account the cumulative risk associated with licensed venues. This should be reflected in planning approvals for the location of packaged liquor outlets.

A review of the *Planning and Environment Act 1987* has been ongoing since 2009. The APC made a submission to this review calling for, amongst other things, measures to build capacity within local councils to consider the cumulative impact of licensed premises in planning decisions. For example, although Victorian planning legislation allows for the consideration of the cumulative impact of both existing and proposed licensed premises when considering planning permit applications, local councils, who are tasked with assessing planning permits, report they have received very little guidance on how to assess 'cumulative impact'. Further, local councils indicate they lack the resources and capacity to undertake their own research in the area. As part of this review an exposure draft bill was released (*Planning and Environment Amendment (General) Bill*); however, the review has not progressed beyond this stage. The APC supports the conclusion of this review, and for the draft bill to be put to Parliament for debate.

In the meantime, we note that the Minister for Planning has recently established an Advisory Committee to help overhaul the planning system in Victoria. We would encourage both the Legislative Council Environment and Planning Committee, and the Advisory Committee to consider the issues raised above in relation to licensed venues and planning regulations.

Thank you for the opportunity to submit to the Inquiry into Environmental Design and Public Health. If you have any questions or would like to discuss this issue further please do not hesitate to contact Sondra Davoren, Legal Policy Advisor – Alcohol, at the Cancer Council Victoria on (03) 9635 5062 or email Sondra.Davoren@cancervic.org.au.

Yours faithfully



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Foundation



Todd Harper
Chief Executive Officer
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Kathy Bell
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Professor Robin Room
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John Fitzgerald
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