

Independent Liquor & Gaming Authority
 Liquor Applications
 GPO Box 7060
 SYDNEY NSW 2001

11 October 2017

I refer to DC Mart application 1-633156555 for a Packaged Liquor Licence located at Shop 1 & 1A, 155 Peats Ferry Rd, Hornsby.

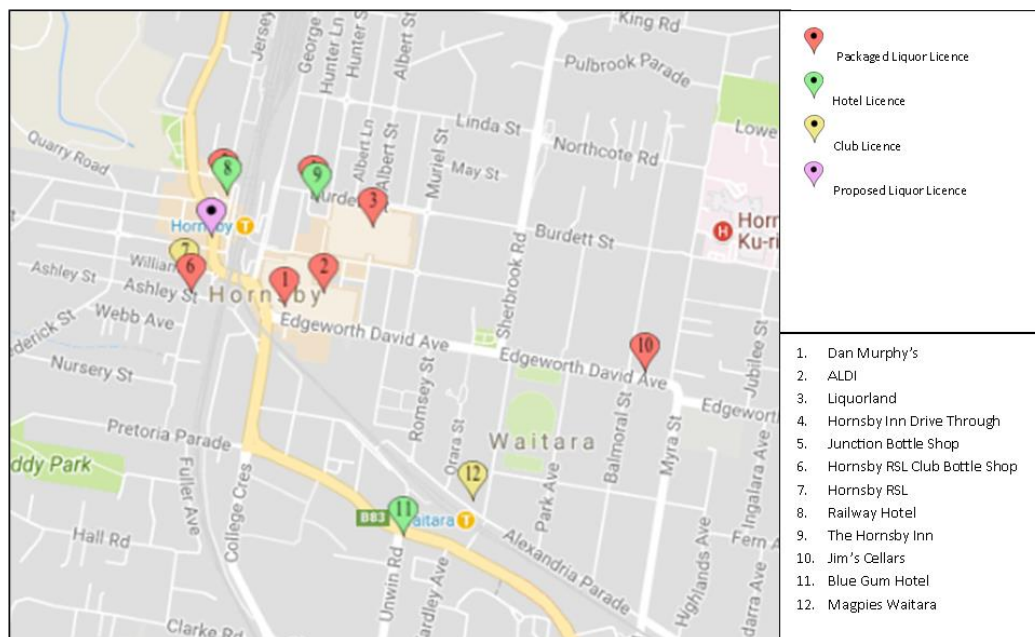
Northern Sydney Local Health District (NSLHD) Health Promotion objects to the granting of this packaged liquor licence as it does not satisfy section 48(5) of the *Liquor Act 2007*. The overall social impact of this particular licence will be detrimental to the well-being of the local and broader community. The rationale and evidence for our position is outlined below.

1. Over supply of alcohol in Hornsby

Increases in alcohol outlet density are associated with alcohol related harm including malicious damage, interpersonal violence, accidental injury and poorer health outcomes including chronic illnesses such as cirrhosis and alcoholic pancreatitis, and increased alcohol-related presentations to emergency departments¹.

There are nine existing alcohol outlets within a 500m radius of the location of the proposed liquor licence. This includes six packaged liquor licences permitting the physical purchase and take-away sales of alcohol, as well as two Hotel licences and 1 Club licence. An additional three liquor licences are located within 1.5km of the proposed licence location. See Figure 1 for current density, location, names and types of existing liquor licences.

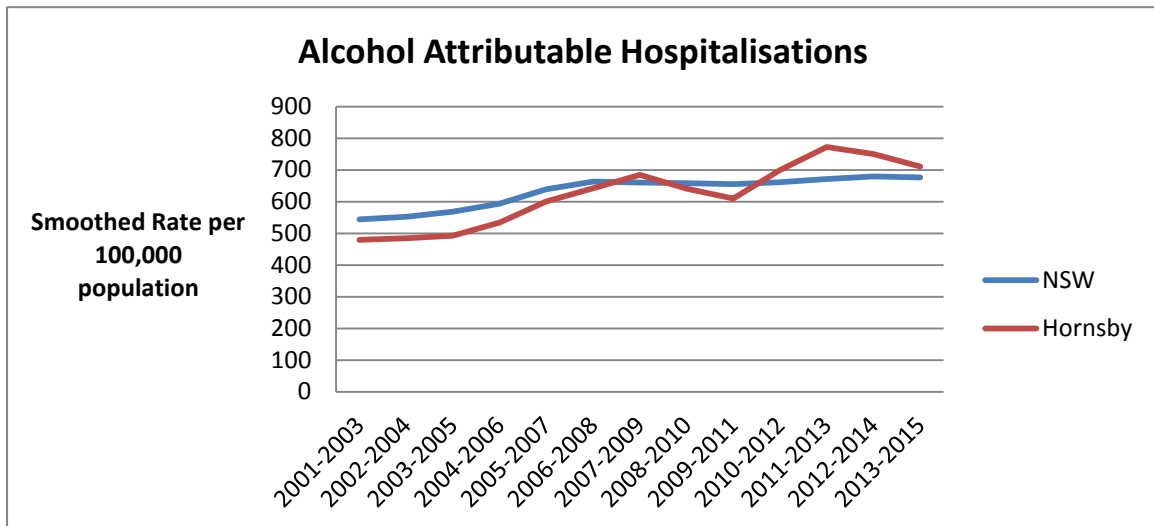
Figure 1



¹ Livingston M, Wilkinson C, Room R. Community impact of liquor licences: an Evidence Check rapid review brokered by the Sax Institute (www.saxinstitute.org.au) for the NSW Ministry of Health, 2015.

This saturation of liquor outlets correlates with NSW HealthStats alcohol-attributable hospitalisation rate for Hornsby. Hornsby LGA has seen an upward trend over the last 10 years; exceeding the NSW rate and remaining higher than the NSW average for the last four years reported. Figure 2 below compares the rate of alcohol-attributable hospitalisations for Hornsby LGA and the NSW average since 2001.

Figure 2

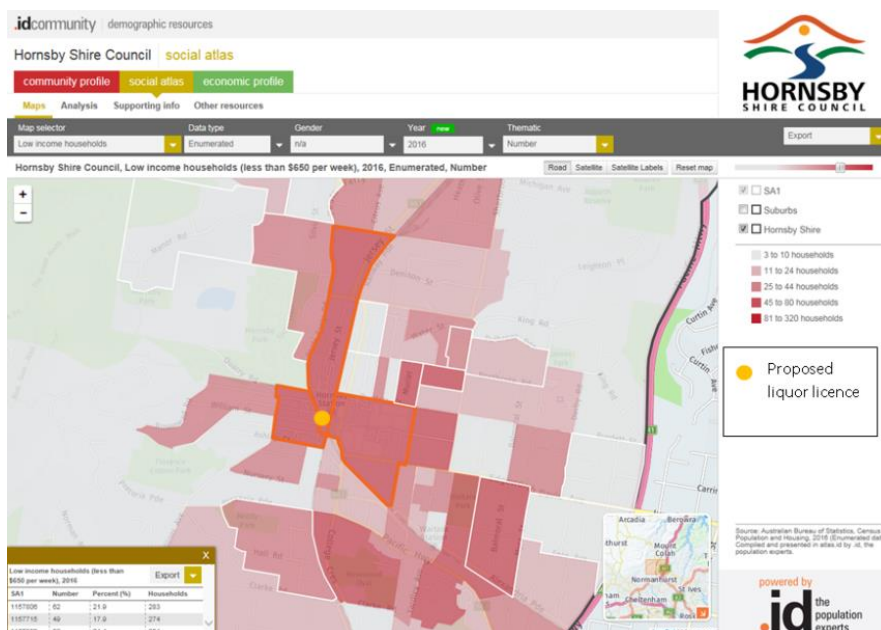


The granting of a seventh packaged liquor licence within the Hornsby Town Centre will NOT contribute to the amenity of community life but rather increase the risk of harm to vulnerable groups living in and around the town centre and accessing local services.

2. Location of proposed licenced premises

The location of the proposed liquor licence is central to one of the most disadvantaged areas within Hornsby LGA. There are 173 low income households (less than \$650 per week) within the immediate area of the proposed location for the new licence as highlighted in Figure 3.

Figure 3



Increased access to alcohol places this already vulnerable population at further risk of harm. 'Household expenditure on alcohol is an aspect of alcohol consumption relevant to health because money spent on alcohol cannot be used for essential items such as food. The 2009-10 Household Expenditure Survey found that poorer households spent a much greater proportion of their income on alcohol than wealthier counterparts'².

There are a number of services for vulnerable populations within the Hornsby local community in close proximity of the proposed packaged liquor licence location and the Authority needs to consider this when assessing the overall social impact this licence could have within the local community:

- Mission Australia (200m from proposed licence)
- Fusion Australia (350m from proposed licence)
- KYDS Youth Development Service (73m from proposed licence)
- Hornsby Wellness Centre (200m)
- Hornsby Drug, Alcohol and Gambling Service (Located at Hornsby Hospital)

These services provide support to youth, adults and disadvantaged families for many reasons including; homelessness and social housing; alcohol, drugs and other dependencies; mental illness; employment training and support; counselling and youth services. The Hornsby/Waitara Community Hub is also a major service offered by Mission Australia with a focus on disadvantaged families and their children who access the service on a daily basis. Approval of this licence can only be detrimental to the high number of vulnerable people living in and accessing Hornsby Town Centre.

The Authority must also take into consideration the number and location of schools and educational facilities in the local community in relation to the proposed licence location:

- Art of Smart Education (within 100m)
- Kip McGrath Education (within 100m)
- James An Coaching College (within 150m)
- Hornsby TAFE (within 500m)
- Hornsby Girls High School (within 500m)
- Barker College
- Clark Road School
- Hornsby South Public School

Further, Hornsby bus and rail interchange is a major hub used extensively by students from Asquith Girls High School, Asquith Boys High School, Normanhurst Boys, Normanhurst Primary, Loretto Normanhurst and Pennant Hills High School.

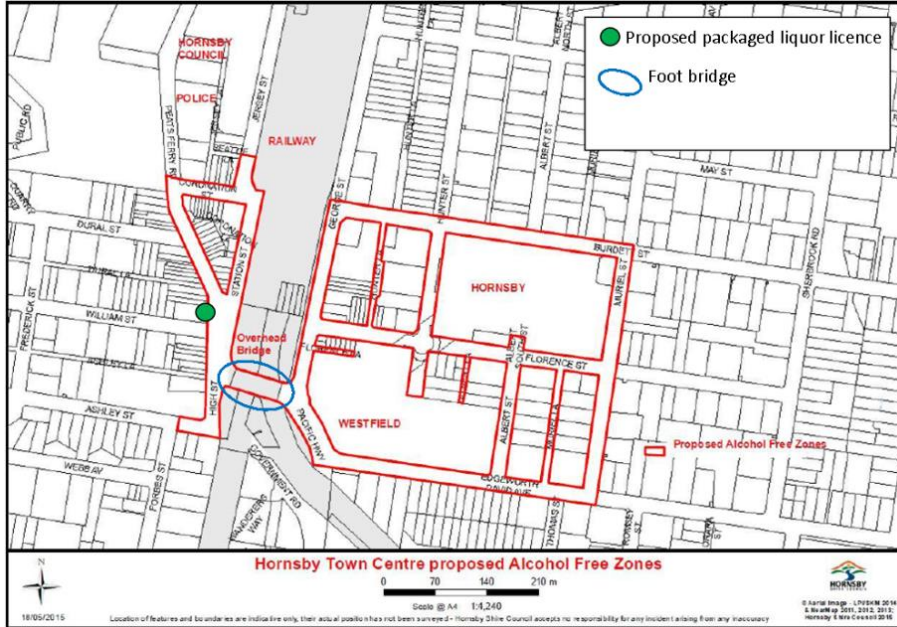
The high density of schools/education facilities within the local community increases the likelihood of young people accessing Hornsby Town Centre and increases their chance of further exposure and access to alcohol.

The address of the proposed licence is located on the main pedestrian thoroughfare to the bridge linking the west side to the east side of Hornsby Town Centre (see Figure 4). School students, youth and vulnerable people using the bridge to access services on the west side of the town centre from the east side will pass by the address of the proposed licence and therefore be exposed to increased risk of alcohol-related harm.

² Yusuf, F., Leeder, S.R., Making sense of alcohol consumption data in Australia. Medical Journal of Australia, 203(3): 128-30, 2015.

Another problem with this proposal is that it is inappropriately located within the Hornsby Council *Alcohol Free Zones* boundary, as outlined in Figure 4. The applicant has failed to acknowledge this information in their CIS.

Figure 4



The Authority is required to determine whether it is satisfied that overall social impact will not be detrimental to the well-being of the community under Section 48(5) of the *Liquor Act 2007* and Northern Sydney Local Health District argues that this licence is likely to increase alcohol-related harm among an already vulnerable community, and we strongly recommend that this packaged liquor licence application be refused.

If you have any questions, please do not hesitate to contact Jenna Harkness, NSLHD Health Promotion (Ryde Hornsby) on 02 8877 5306 or Jenna.Harkness@health.nsw.gov.au

Kind regards,

Paul Klarenaar
Director
Health Promotion
Northern Sydney Local Health District