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To whom it may concern,

Re: Category B Community Impact Statement Notice of Intention to apply for a liquor licence for a boutique packaged liquor facility to be located at Shop 9, 2-14 Pittwater Road, Manly.

The Northern Sydney Local Health District (NSLHD) Health Promotion service has an active interest in measures to prevent or reduce alcohol-related harm such as malicious damage, interpersonal violence, accidental injury and long-term health impacts.

NSLHD Health Promotion has concerns regarding the proposal for a packaged liquor outlet at **Shop 9, 2-14 Pittwater Road, Manly.**

The proposed packaged liquor outlet is within very close proximity to a backpackers hostel, Manly Backpackers, as well as many other packaged liquor outlets within a 500 metre radius including ALDI, The Ivanhoe Hotel Bottleshop, Liquorland, Liquorland Express and Manly Bottler.

The Manly Backpackers Hostel is less than 50 metres from the proposed packaged liquor outlet and is a very popular venue for young international travellers. The risks associated with younger people pre-fuelling are increased by the addition of another packaged liquor outlet within very close proximity.

Increasing the density of liquor outlets is likely to increase alcohol consumption and alcohol-related harm, particularly among young people¹. Within the Manly entertainment precinct, in addition to the 6 existing packaged liquor outlets, there are approximately 120 liquor licences (including hotel, club, on-premise, packaged and producer wholesaler). The saturation of packaged liquor licences in Manly (calculated per 1000 residents) is currently already higher than the NSW packaged liquor licence saturation. Manly has a saturation of 0.441195008 vs the NSW saturation level of 0.335860905. The granting of an addition packaged liquor licence within the Manly area would only increase the saturation level and the associated alcohol related harm.

The health impacts attributable to alcohol remain a strong concern in the suburb of Manly, with 401 Emergency Department (ED) alcohol-related visits at Manly District Hospital between 1st January 2017 and 31 December 2017. The rate of alcohol visits per 1,000 unplanned ED visits at Manly District Hospital was also 182% higher than the NSW average.

¹ Treno, A.J.; Ponicki, W.R.; Remer, L.G.; and Gruenewald, P.J. Alcohol outlets, youth drinking, and self-reported ease of access to alcohol: A constraints and opportunities approach. *Alcoholism: Clinical and Experimental Research* 32:1372–1379, 2008.



Observations and anecdotal evidence from both the Northern Beaches Local Area Police Command and service providers have revealed that the nearby Gilbert Park (less than 200 metres from the proposed packaged liquor outlet) is known for alcohol related crimes such as assaults (including assaults on homeless people), malicious damage and secondary supply of alcohol. Therefore, this proposal represents an extra source of alcohol for minors, either by direct purchase attempts or through secondary supply avenues.

The Notice of Intention stipulates that the proposal will be a 'boutique facility'. Northern Sydney Local Health District (NSLHD) Health Promotion recommends that this is enforced as a condition of the licence.

As per previous conditions placed on packaged liquor licences by ILGA on similar 'boutique' bottle shops, we recommend:

- The licence is restricted to local and imported boutique wine, beer and spirits, not otherwise readily available in mainstream packaged liquor outlets. For the purposes of this condition, "boutique wine" means wine that is manufactured by or on behalf of a boutique wine producer which crushes and bottles 250 tonnes or less annually, under its own label and is owned independently (not owned by a larger wine company).
- The licensee will ensure that quality Australian wines will be available for sale on the premises, at a minimum of \$16 per bottle, up to \$3,000 per bottle.
- There will be no discounted wines or cartons of beer, no RTD's, no casks, no clean skin wines or other discounted alcoholic products.

Should this proceed to a formal liquor licence application, and consent to the abovementioned conditions are stipulated within the Community Impact Statement, NSLHD would not deem it necessary to submit a detailed objection to the granting of this licence.

If you have any questions, please do not hesitate to contact Melissa Palermo, Manager NSLHD Health Promotion (Northern Beaches) at 02 9388 5295 or Melissa.Palermo@health.nsw.gov.au.

Thank you for the opportunity to comment on the proposed liquor licence application.

Kind regards

Paul Klarenaar
Director NSLHD Health Promotion