

Tony Schwartz
Back Schwartz Vaughan
Level 1, 156 Edgecliff Road
WOOLLAHRA NSW 2025

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I refer to your client's Notice of Intention (NOI) to apply for a packaged liquor licence for *Miracle Liquor Chatswood*, which is to be located within the Miracle Supermarket at Shop G01, 65 Albert Avenue, Chatswood.

Northern Sydney Local Health District (NSLHD) 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 has concerns over the proposed location of this packaged liquor licence and the negative impacts the increased access to alcohol is likely to generate for the Chatswood community.

These concerns include:

- The suburb of Chatswood already has an oversaturation of packaged liquor licences (11) in relation to the community they serve. This is evidenced by a higher saturation rate than the state average (figures provided by Liquor & Gaming NSW).
- The proposed bottle shop will be situated within the Mandarin Centre, which is located 750m to Odyssey House, a service for adults with alcohol and drug dependencies, 450m to Recovery Central, which specialises in addiction counselling and psychology and 550m to Sydney Counselling Centre, who provide psychological assessment and intervention services for alcohol and drug addiction disorders, major depression, eating disorders and post-traumatic stress disorders.
- The premises will also be located directly opposite the Chatswood Youth Centre and a short 4 minute walk to Chatswood Headspace. These services cater for a large number of vulnerable and at-risk young people, who are likely to be influenced by discounted mainstream alcohol products.
- The health impacts attributable to alcohol remain a significant concern locally, with 600 Emergency Department (ED) alcohol-related visits to Royal North Shore Hospital between 1 January 2017 and 31 December 2017. The rate of alcohol visits per 1,000 unplanned ED visits at Royal North Shore Hospital was also 21% higher than the state average.
- The Willoughby LGA is located within the Northern Sydney Local Health District, which has the highest number and rate of alcohol-attributable hospitalisations in NSW.
- Whilst overall rates are relatively low compared to the NSW average, the Mandarin Centre is located within "high" hotspots for domestic assaults and malicious damage to property, and within a "medium" hotspot for alcohol-related assaults. This indicates that a higher proportion of these offences are occurring within close proximity to the proposed premises.
- 19.8% of households within the Chatswood CBD are low-income households, which is higher than both Greater Sydney and NSW. This is problematic as these residents are likely to be susceptible to spending a larger proportion of total household income on alcohol. This has particular relevance to health as money spent on alcohol cannot be spent on essential food and medical costs.

It is noted that "the Supermarket specialises in providing Asian style grocery items" and that the bottle shop will have a "similar emphasis". However, the NOI also states that the premises will provide a small range of mainstream products. Limiting the liquor sold only to imported boutique products is less likely to target the vulnerable groups mentioned above, and therefore has the potential to lessen the impact of an additional liquor licence on a community already experiencing substantial alcohol-related harms. Similarly, selling only unrefrigerated liquor products reduces the likelihood of immediate harmful consumption.

We strongly recommend the applicant consents to the following conditions:

- The licence will be restricted to imported boutique wine, beer and spirits, not otherwise readily available in mainstream packaged liquor outlets.
- There will be no discounted wines or cartons of beer, no ready-to-drink mixers, no casks, no cleanskin wines or other discounted alcoholic products sold on the premises.
- The licensee will not sell refrigerated liquor products from the licensed premises.

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.

If you have any questions, please do not hesitate to contact Jonathon Noyes, NSLHD Health Promotion (Lower North Shore) at 02 9462 9568 or jonathon.noyes@health.nsw.gov.au.

Kind regards

Paul Klarenaar
Director
NSLHD Health Promotion