

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

7 March 2017

I refer to ALDI Foods Pty Limited’s application for a Packaged Liquor Licence (APP-0002653283) located in the Bridgepoint Shopping Centre, 1-3 Brady Street, Mosman NSW 2088.

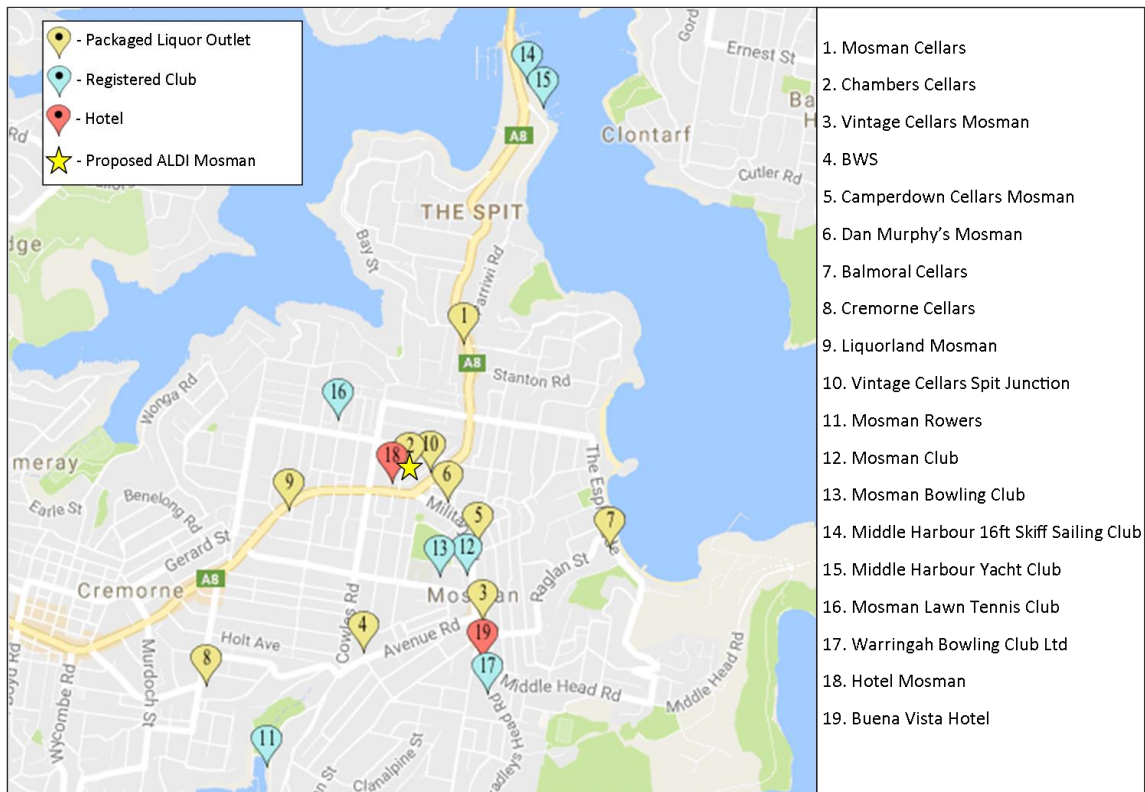
Northern Sydney Local Health District (NSLHD) has an active interest in measures to prevent or reduce alcohol-related harm such as malicious damage, interpersonal violence, accidental injury and long-term health impacts.

**We object 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 licence will be detrimental to the well-being of the local and broader community due to the following concerns:**

Mosman LGA already has an oversaturation of packaged liquor licences in relation to the community they serve. There are currently 10 packaged liquor licences permitting the physical purchase and take-away sales of alcohol in the Mosman community, as well as an additional online retailer. Furthermore, there are seven club licences and two hotel licences that permit the take-away sales of alcohol within the LGA. Image 1 maps the current liquor licences in the Mosman LGA permitting take-away sales in relation to the proposed ALDI Mosman.

**Image 1**

**Liquor licences in the Mosman LGA that permit take-away sales of alcohol**



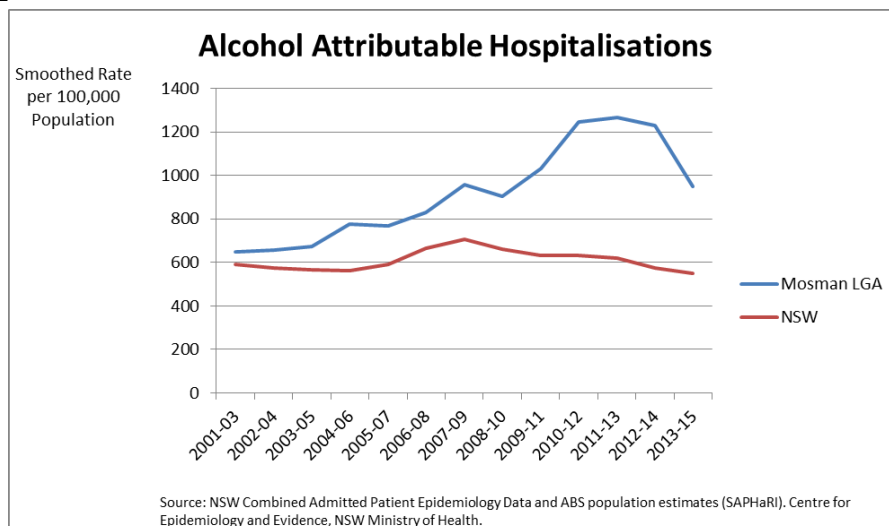
The applicant concedes in section 6.29 of the Community Impact Statement that the current packaged liquor licence density for the Mosman LGA, excluding the online retailer, is already higher than the NSW average. The applicant attempts to justify the increased density by highlighting that four of the packaged liquor licences are presently not trading and that none of the club or hotel licences currently permit take-away sales. However, the authority must consider the cumulative social impact based on the licences granted, rather than current trading levels or business models, as these can change without the requirement to undertake a further approval process. In addition, Mosman LGA's overall licence density is also higher than the NSW rate per 100,000 persons. The table below provides a comparison of the current liquor licences rates per 100,000 between the Mosman LGA and the NSW average, based on 2011 Census data (excluding the online retailer), as well as a comparison factoring in the granting of this additional packaged liquor licence.

**Table 1**

	All Licences (Sept 2016)	Clubs	Hotels	PLLs
<b>NSW Density (current)</b>	215.72	19.04	30.75	34.65
<b>Mosman LGA (current)</b>	233.13	25.50	10.93	36.43
<b>NSW Density (additional PLL)</b>	215.72	19.04	30.75	34.66
<b>Mosman LGA (additional PLL)</b>	236.77	25.50	10.93	40.07

The health impact of this saturation of liquor outlets is reflected in the NSW HealthStats alcohol-attributable hospitalisation rate. Mosman LGA's alcohol-attributable hospitalisation rate has markedly exceeded the NSW average over the past 10 years. Even accounting for the recent short-term decline (which is to be expected when analysing long-term trends), the most recent data from 2013-15 period indicates that the Mosman LGA has a 73% higher alcohol-attributable hospitalisation rate than the NSW average. The graph below compares the rate of alcohol-attributable hospitalisations for Mosman LGA and the NSW average since 2001.

**Graph 1**



Whilst the Mosman LGA has a high SEIFA score and falls within the highest SEIFA quintile, this doesn't preclude residents from the significant harms associated with alcohol. According to an Australian Institute of Health and Welfare analysis of the Australian Health Survey 2011-12, adults living in the least disadvantaged areas are 1.4 times as likely to exceed alcohol consumption guidelines as those living in the most disadvantaged areas<sup>1</sup>. Healthstats NSW data also indicates that the least disadvantaged population are more likely to drink daily or weekly than the rest of the population<sup>2</sup>.

<sup>1</sup> AIHW analysis of ABS Microdata: Australian Health Survey, National Health Survey, 2011-12. Available at <http://www.aihw.gov.au/risk-factors/alcohol/> Accessed 1/3/2017

<sup>2</sup> NSW Population Health Survey (SAPHaRI). Centre for Epidemiology and Evidence, NSW Ministry of Health.

Furthermore, the rate of drink driving offences recorded by the NSW Police Force as occurring in the Mosman LGA is comparable to the state average. The data in the table below was provided by the Bureau of Crime Statistics and Research and compares the drink driving offences detected in the Mosman LGA and the NSW average.

**Table 2**

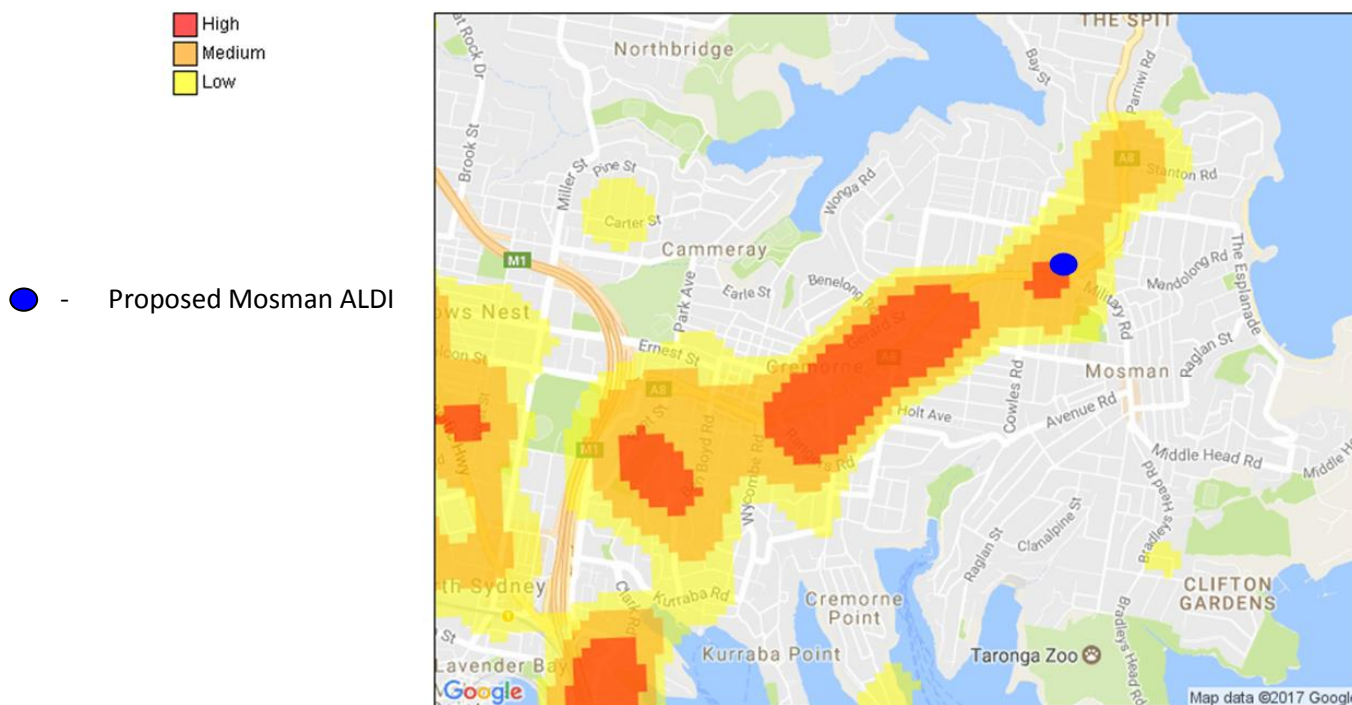
Incident location	Driving offence*	Count	Rate	Population
NSW	Driving Under The Influence Of Alcohol Or Other Substance	1093	14.5	7518472
	Exceed The Prescribed Content Of Alcohol	17934	238.5	7518472
Mosman LGA	Driving Under The Influence Of Alcohol Or Other Substance	5	16.5	30276
	Exceed The Prescribed Content Of Alcohol	71	234.5	30276

Source: NSW Bureau of Crime Statistics and Research

The location of the proposed Mosman ALDI liquor licence is particularly problematic and is likely to contribute to alcohol-related harm in the local area. There is strong evidence linking domestic violence with the density of packaged liquor outlets. Livingston (2011) identifies a 3.3% increase in domestic violence with a 10% increase in off-licence liquor<sup>3</sup>. Whilst the domestic assault rates are lower than the NSW average overall, the proposed licence is located within a ‘hotspot’ for domestic assaults (Image 2).

**Image 2**

Incidents of Assault (Domestic assault) from Oct 2015 to Sep 2016



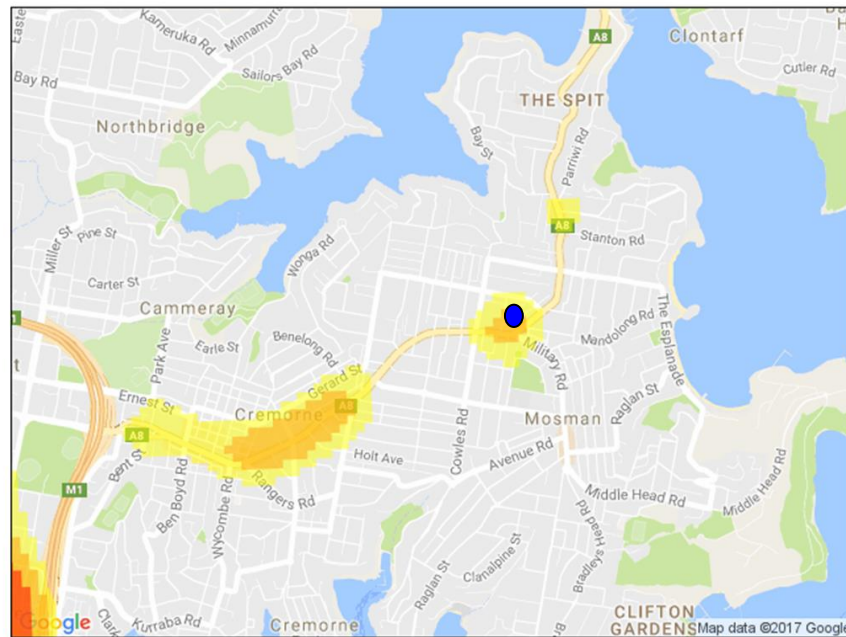
Bureau of Crime Statistics and Research – Incidents of Alcohol Related Assault (domestic) from Oct 2015 to Sep 2016. Available at <http://crimetool.bocsar.nsw.gov.au/bocsar/>. Accessed 1/03/2017

Mapping data from the NSW Bureau of Crime Statistics and Research also indicates that the proposed outlet is located in an area with a “medium” level of alcohol-related assaults (Image 3). The granting of an additional packaged liquor licence is likely to increase the incidence of both domestic violence and alcohol-related assaults in the local area.

<sup>3</sup> Livingston, M., (2011). A Longitudinal analysis of alcohol outlet density and domestic violence. *Addiction*, 106(5): 919-925.

**Image 3**

Incidents of Alcohol Related Assault from Oct 2015 to Sep 2016



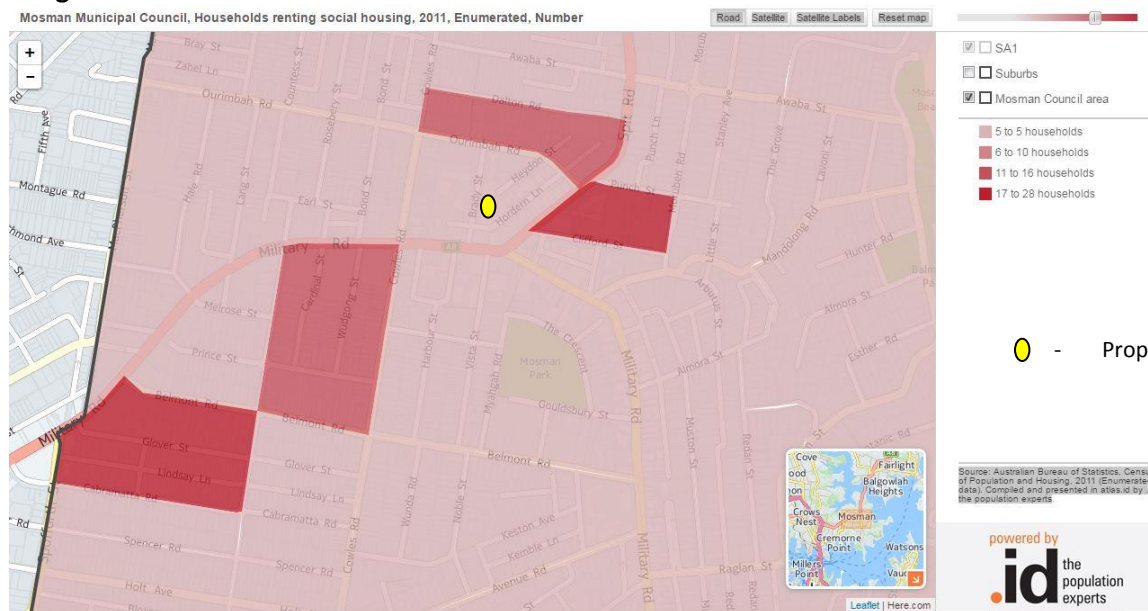
● - Proposed Mosman ALDI

Bureau of Crime Statistics and Research – Incidents of Alcohol Related Assault from Oct 2015 to Sep 2016. Available at <http://crimetool.bocsar.nsw.gov.au/bocsar/>. Accessed 1/03/2017

As mentioned previously, Mosman LGA has a high SEIFA score. However, pockets of disadvantage exist within the locality that must be considered. There are 28 social housing households within 300m of the proposed outlet (Image 5) and 90 social housing households throughout the Mosman LGA. Findings from the Household Expenditure Survey 2009-2010 highlight that the most disadvantaged portion of the population spend a larger proportion of total household income on alcohol<sup>4</sup>. This has particular relevance to health as money spent on alcohol cannot be spent on essential food and medical costs. The increased access to heavily discounted alcohol offered by ALDI liquor outlets will place this already vulnerable community further ‘at-risk’.

**Image 4**

Mosman Municipal Council, Households renting social housing, 2011, Enumerated, Number



● - Proposed Mosman ALDI

Atlas.Id – Mosman Council Households Renting Social Housing. Available at <http://atlas.id.com.au/mosman#MapNo=10059&SexKey=4&datatype=1&thetype=2&topicAlias=renting-social-housing&year=2011>. Accessed 1/03/2017

<sup>4</sup>Yusuf, F., Leeder, S.R., Making sense of alcohol consumption data in Australia. Medical Journal of Australia, 203(3): 128-30, 2015.

NSLHD Health Promotion has a history of working to reduce the potential of liquor outlets to be a source of alcohol for minors, either by direct purchase attempts or secondary supply avenues, through projects such as the highly successful “Stop the Supply” campaign. Research indicates that as the number of alcohol outlets increase in an area, the rate of adolescent alcohol use increases, with the most vulnerable young people aged 12 – 14 years<sup>5</sup>.

The Authority has accepted in previous ALDI liquor licence decisions, that whilst ALDI staff aren’t likely to knowingly sell liquor to minors or intoxicated persons, there is little they can do within a busy supermarket environment to monitor or prevent the abuse of packaged liquor away from the point of sale or the immediate location of the premises. The proposed packaged liquor outlet will be situated in a large ALDI supermarket within the Bridgepoint Shopping Centre, which significantly increases the risk of secondary supply of alcohol to minors outside the store’s immediate vicinity.

Finally, the applicant proposes that “the Authority has now granted numerous packaged liquor licences for ALDI Supermarkets in NSW” as an argument to grant this licence. However, the applicant omits that the Authority has also refused several ALDI packaged liquor licences including Edgeworth, Byron Bay, Goonellabah, Taree and Lake Haven.

The applicant also suggests the granting of this packaged liquor licence will provide a number of ‘public interest benefits’. NSLHD Health Promotion offers the following response to some of these supposed benefits:

Reduction in traffic: The applicant contests that the liquor outlet will eliminate the need for ALDI customers to make special trips elsewhere in the suburb or outside the suburb to purchase liquor. However, a Chambers Cellars already exists within the Bridgepoint Shopping Centre negating any need for their customers to make additional trips and will therefore not lead to a reduction in traffic.

Public Safety: The applicant suggests that by eliminating the need for Mosman residents to make an inconvenient trip to other ALDI Supermarkets is somehow a public safety benefit. However, in reality the granting of this liquor licence will contribute to alcohol-related harm and reduce overall public safety.

Increase in Employment: The application stipulates that the licensed premises is a small “liquor sales area” within the existing ALDI supermarket. Due to the size and nature of the proposed licensed premises, any significant employment benefits will be generated from the supermarket itself, rather than the sale of alcohol.

Contributing to Initiatives to Moderate the Drinking Culture: The assistance given to community organisations such as ALDI’s contribution to “Drinkwise”, is largely negated by the harm associated with the sale of heavily discounted alcohol, which is synonymous with ALDI liquor outlets.

Consumer Convenience: The consumer convenience argument is invalid as customers of the Bridgepoint Shopping Centre can purchase alcohol from the existing Chambers Cellars located within the complex, without the need to commute to another destination.

Reduce Escape Expenditure: As mentioned previously, there are already ten packaged liquor licences located within the Mosman LGA, with four currently operating within a 1km radius of the proposed licence. Mosman residents wishing to purchase alcohol already have substantial choice, encouraging spending within the local area.

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<sup>5</sup> Rowland, B., Toumbourou, J.W., Satyen, L., Tooley, G., Hall, J., Livingston, M., (2014). Associations between alcohol outlet densities and adolescent alcohol consumption: A study in Australian students. *Addictive Behaviours* 39:282-288.



Need: There is already an oversupply of packaged liquor outlets for the Mosman population as identified by the higher licence density than the NSW average. Therefore, the argument proposed by the applicant that there is sufficient need for an additional packaged liquor licence is invalid.

In summary, the increased access to alcohol generated by the proposed ALDI Mosman is likely to negatively impact the health and safety of the Mosman community, and we strongly recommend that this packaged liquor licence application be refused.

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](mailto:jonathon.noyes@health.nsw.gov.au).

Kind regards,

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Northern Sydney Local Health District