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To whom it may concern

**SUBMISSION REGARDING HOUSEKEEPING AMENDMENT TO THE STATE POLICY FOR EXEMPT AND COMPLYING DEVELOPMENT**

The Foundation for Alcohol Research and Education (FARE) writes to support the submission from Dr Alison Ziller regarding *Housekeeping Amendment to the State Policy for Exempt and Complying Development*.

Harms arising from liquor sold from packaged liquor outlets (PLO) is a key concern for NSW communities.

Their concerns are well-founded. Peer-reviewed research from Australia and abroad has consistently found that increased alcohol outlet density contributes to increased alcohol harms,<sup>i,ii</sup> including family violence<sup>iii,iv</sup> and child maltreatment.<sup>v</sup> An Australian study from Melbourne has found that there is a strong association between domestic violence and the concentration of off-licence liquor outlets in an area, in that a 10 per cent increase in off-licence liquor outlets is associated with a 3.3 per cent increase in domestic violence. A study in Western Australia, found that for every 10,000 additional litres of pure alcohol sold at a packaged liquor outlet, the risk of violence experienced in a residential setting increased by 26 per cent.<sup>vi</sup>

Understanding that the concentration of alcohol outlets is higher in disadvantaged communities<sup>vii</sup> is important when determining appropriate policy options. Research has found that the increased access to alcohol in disadvantaged communities may help explain some of the socio-economic disparities in health outcomes.<sup>viii</sup> The review also suggested that it might be harder for disadvantaged communities to influence planning and zoning decisions, thereby hindering their ability to prevent the continuing proliferation of outlets.<sup>ix</sup>

Liquor licences are approved by the Independent Liquor and Gaming Authority (ILGA). ILGA relies on local council approval of development applications prior to considering licence applications. Presently in NSW, retail premises can become a PLO without notifying the local council, providing there are no traffic impacts or building alterations.

Section 2.20B(f) of the Exempt and Complying Development State Environmental Planning Policies (SEPP) requires new uses of premises with social risks to provide a development application for the local council to consider. This section of the Exempt and Complying Development SEPP does not include packaged liquor outlets.

Section 2.20B(f) of the Exempt and Complying SEPP should be amended to include retail packaged liquor outlets. This amendment is essential given the increased alcohol risks associated with increased availability of alcohol from packaged liquor outlets.

It is essential that planning instruments should not inadvertently contribute to alcohol-related harm by removing scrutiny of changes of use for packaged liquor outlets.

Yours sincerely



**MICHAEL THORN**  
**CHIEF EXECUTIVE**

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<sup>i</sup> Liang, W. & Chikritzhs, T. (2010). Revealing the link between licensed outlets and violence: Counting venues versus measuring alcohol availability. *Drug and Alcohol Review*. 30, 524-535.

<sup>ii</sup> Morrison, C. & Smith, K. (2015). Disaggregating relationships between off-premise alcohol outlets and trauma. Canberra: Monash University, Ambulance Victoria and Foundation for Alcohol Research and Education.

<sup>iii</sup> Donnelly, N., Menendez, P., & Mahoney, N. (2014). The effect of liquor licence concentrations in local areas on rates of assault in New South Wales. *Contemporary Issues in Crime and Justice*. No. 81. Sydney: Bureau of Crime Statistics and Research.

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

<sup>v</sup> World Health Organization. (2006). WHO facts on: Child maltreatment and alcohol. Retrieved from:  
[http://www.who.int/violence\\_injury\\_prevention/violence/world\\_report/factsheets/fs\\_child.pdf](http://www.who.int/violence_injury_prevention/violence/world_report/factsheets/fs_child.pdf)

<sup>vi</sup> Liang, W and Chikritzhs, T (2010). *Revealing the link between licensed outlets and violence: Counting venues versus measuring alcohol availability*. *Drug and Alcohol Review*. 30, 524-535.

<sup>vii</sup> Livingston, M. & Victorian Health Promotion Foundation (VicHealth). (2011). Using geocoded liquor licensing data in Victoria-The socioeconomic distribution of alcohol availability in Victoria. Retrieved from:

<https://www.vichealth.vic.gov.au/media-and-resources/publications/report-on-liquor-outlets-and-socio-economic-areas-in-victoria>

<sup>viii</sup> Livingston, M. (2012). The social gradient of alcohol availability in Victoria, Australia. *Australian and New Zealand Journal of Public Health*. Vol 36 (1). Pp 41-47.

<sup>ix</sup> Ibid.