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**From:** Tristan Standen (Northern Sydney LHD)  
**Sent:** 11/10/2024 1:33:08 PM  
**To:** Council Northernbeaches Mailbox  
**Cc:** NSLHD-AlcoholTobaccoTeam  
**Subject:** TRIMMED: DA2024/1091 - Northern Sydney Local Health District Development Application Response  
**Attachments:** NSLHD DA Submission- DA2024 1091.pdf;

Good Afternoon,

I am writing today on regarding development application no.: **DA2024/1091**

Attached is a submission from Northern Sydney Local Health District regarding this application. Can it please be forwarded to relevant council officer for their review.

Any issues please do not hesitate to reach out.

Kind Regards,

**Tristan Standen**  
Health Promotion Officer  
Population Health Promotion  
**Northern Sydney Local Health District**  
T (02) 8797 7636 E [REDACTED]

612-624 Pittwater Road  
Brookvale, NSW 2100



**Northern Sydney  
Local Health District**

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## Vaping Information Hub



**POPULATION  
HEALTH PROMOTION  
PLAN 2022-2027**



### Reducing risky drinking & alcohol-related harms

■ Prevent increase of alcohol-attributable hospitalisations.

### Reducing smoking and vaping

▼ Reduce smoking rates to below 6.5%

[Click to read the plan](#)

I acknowledge the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.

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Northern Beaches Council  
PO Box 82  
Manly NSW 1655

## NSLHD Consultation Submission for Development Application (DA2024/1091)

11 October 2024

Dear Northern Beaches Council,

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 do not support the Development Application (Application Number: DA2024/1091) for Careel Head Road, Avalon Beach which proposes the construction of a mixed-use development. This includes a large retail store (approximately 500m<sup>2</sup>) which would house a Dan Murphys and an early childhood education centre. NSLHD has concerns about the health and social impacts this development would have on the local community. Our concerns are expressed below:

### Alcohol-related health harms

Avalon Beach is a suburb within the Northern Beaches Local Government Area (LGA) and is serviced by the Northern Beaches Hospital for emergency admissions. Northern Beaches LGA has a significantly higher rate of alcohol attributable hospitalisations compared to the rest of the state at a spatially adjusted rate of 872 per 100,000 compared to NSW at 528 per 100,000<sup>i</sup>. This is 65% higher than the NSW rate. Furthermore, the most recent Northern Beaches Hospital Emergency Department data released in 2022 shows that<sup>ii</sup>:

- Unplanned alcohol visits per 1,000 to ED were 47% higher than the rest of NSW.
- The rate of late-night unplanned alcohol visits per 1,000 to ED was 36% higher than the rest of NSW.

*Northern Sydney Local Health District is located on the traditional lands of the Eora Nation*

## Proximity to an early childhood education centre

- The architectural plans depict the Dan Murphy's on the ground floor and the childcare centre directly above on level 1. Guideline 6 of the Liquor Act 2007 "*Consideration of social impact under section 48(5) of the Liquor Act 2007*" outlines that 'location' must be considered in regard to the 'impact upon community well-being, specifically proximity of proposed licensed premises to 'schools, universities, TAFE colleges or other educational facilities'<sup>iii</sup>.
- Education settings provide an important civic place for communities and often operate as social hubs for parents, children and the broader community<sup>iv</sup>.
- Consideration needs to be given to the 'State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017, Schedule 4, Principal 4 – health and safety which states: 'good school development optimises health, safety and security within its boundaries and the surrounding public domain, and balances this with the need to create a welcoming and accessible environment'<sup>v</sup>.
- A well-planned built environment should be healthy for all members of the community and includes the promotion of social cohesion, community safety and wellbeing<sup>vi</sup>.
- The proposed DA would increase young children's exposure to alcohol and alcohol marketing on a regular basis. The relationship between exposure to alcohol marketing and increased youth drinking is evident<sup>vii,viii</sup>. A recent study found that schools with alcohol retailers within a 500 metre radius on average experience 30 times more alcohol related advertising than those without an alcohol retailer in the same area<sup>ix</sup>.

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## Density

The current September 2024 Liquor and Gaming NSW Licenced Premises data reveals that there are currently 4 existing packaged liquor licences in the Avalon area and another currently under consideration (Winona Wines) by Liquor and Gaming NSW (see table 1 below). If the Winona Wines licence application is approved, this will increase the density of PLLs in the Avalon Beach area to 5. There is evidence that the availability of alcohol products and the density of outlets that sell alcohol are linked to alcohol-related harms, as summarised in a recent systematic review<sup>x</sup>.

Store	Address
Clareville Cellars Fine Wine & Beer	Shop 6 - Shop 7 25 Hudson Parade, Avalon Beach NSW
Chambers Cellars	Shop 1 Old Barrenjoey Road & Avalon Parade, Avalon Beach NSW
North Avalon Cellars	Shop 3 North Avalon Road, Avalon Beach NSW
Vintage Cellars	17-19 Old Barrenjoey Road, Avalon Beach NSW
Winona Wines**	Shop 1, 25 Old Barrenjoey Road, Avalon Beach, NSW

Table 1: Packaged liquor licences in Avalon area.

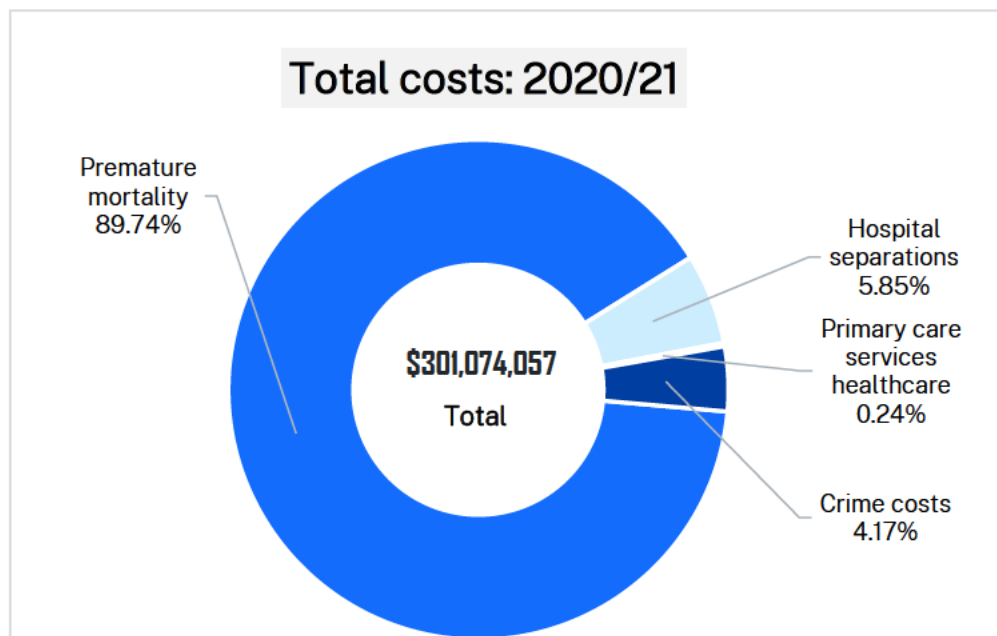
\*\* *Not open but is liquor licence application currently under review with the Independent Liquor and Gaming Authority (see application number APP-0013332181).*

**Alcohol consumption and social advantage**

Whilst Avalon Beach has a high SEIFA Index of Relative Socio-Economic Advantage and Disadvantage (IRSAD) with a 2021 Index score of 1124.7<sup>xi</sup> and is placed in the 98th percentile, it does not preclude residents from the significant harms associated with alcohol. In terms of the Index of Relative Socio-Economic Disadvantage (IRSD), the suburb of Avalon Beach (to Clareville) has a score of 97 (out of 100) with a higher score on the index meaning a higher level of advantage<sup>xii</sup>. This indicates that 97% of Australia’s suburbs have a SEIFA index lower than the area of Avalon Beach and are **more disadvantaged**. According to the Australian Institute of Health and Welfare, adults living in the least disadvantaged areas (most affluent) were 1.3 times as likely to exceed alcohol consumption guidelines as those living in the most disadvantaged areas (20% and 15%, respectively)<sup>xiii</sup>.

**Economic costs of alcohol for the Northern Beaches LGA**

The Alcohol-Related Harms Costing Model (ARHCM) is an interactive costing tool developed to assist NSW stakeholders to identify the costs of alcohol-related harm, with a focus on producing estimates at the Local Government Area (LGA) level<sup>xiv</sup>. The 2024 ARCHM model shows that in the 2020/2021 financial year, alcohol attributable costs in the Northern Beaches Local Government Area were estimated to be \$301,074,057. This includes both tangible (premature mortality, hospital morbidity, other health costs and crime) and intangible costs (premature mortality and victims of crime). This is depicted in Graph 1 below.



Graph 1: Tangible and Intangible Health Costs for Northern Beaches LGA

## Domestic Assault

An Evidence Check conducted by Livingston, Wilkinson and Room identifies a strong association between the volume of sales from packaged liquor outlets and increased rates of violence in a given area<sup>xv</sup>. It is reasonable to assume that the applicant (Dan Murphy's) would aim to increase the volume of alcohol sold from the 500m<sup>2</sup> proposed premises to offset the operational costs compared to other smaller PLLs in the Avalon area.

We strongly encourage Council to prioritise the above points relating to community health, wellbeing and safety as part of the decision-making process. To prevent the undesirable effects and impacts associated with the approval of this Development Application, NSLHD Population Health Promotion:

- **Does not support the granting** of this application by the Northern Beach Council.

If you have any questions, please do not hesitate to contact Tristan Standen, NSLHD Health Promotion on (02) 8797 7636 or [nsldh-alcoholtobaccoteam@health.nsw.gov.au](mailto:nsldh-alcoholtobaccoteam@health.nsw.gov.au)

Yours sincerely



Paul Klarenaar  
Director | NSLHD | Population & Planetary Health

<sup>i</sup> NSW Combined Admitted Patient Epidemiology Data and ABS population estimates (SAPHaRI). Centre for Epidemiology and Evidence, NSW Ministry of Health. Unpublished tables from Australian Burden of Disease Study, 2015. Australian Institute of Health and Welfare.

<sup>ii</sup> Emergency Department Records for Epidemiology (EDRE), Centre for Epidemiology and Evidence (CEE), NSW Ministry of Health.

<sup>iii</sup> Independent Liquor & Gaming Authority. Consideration of social impact under section 48(5) of the *Liquor Act 2007* [Internet] Sydney: NSW Government; 2021 [cited 2024 September 24]. Available from: <https://www.ilga.nsw.gov.au/sites/default/files/2024-05/ILGA-Guideline-6.pdf>

<sup>iv</sup> Government Architect NSW. Design Guide for Schools [Internet]. Sydney: NSW Government; 2018 [cited 2024 September 25]. Available from: <https://www.planning.nsw.gov.au/sites/default/files/2023-03/design-guide-for-schools.pdf>

<sup>v</sup> NSW Government, State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017. Accessed 25 September 2024.

<sup>vi</sup> Government Architect NSW. Design Guide for Schools [Internet]. Sydney: NSW Government; 2018 [cited 2024 September 25]. Available from: <https://www.planning.nsw.gov.au/sites/default/files/2023-03/design-guide-for-schools.pdf>

<sup>vii</sup> Finan LJ, Lipperman-Kreda S, Grube JW, Balassone A, Kaner E. Alcohol Marketing and Adolescent and Young Adult Alcohol Use Behaviors: A Systematic Review of Cross-Sectional Studies. *J Stud Alcohol Drugs Suppl.* 2020 Mar;(19):42-56. doi: 10.15288/jsads.2020.s19.42. PMID: 32079561; PMCID: PMC7063997.

<sup>viii</sup> Sargent JD, Babor TF. The Relationship Between Exposure to Alcohol Marketing and Underage Drinking Is Causal. *J Stud Alcohol Drugs Suppl.* 2020 Mar;(19):113-124. doi: 10.15288/jsads.2020.s19.113. PMID: 32079567; PMCID: PMC7063998.

<sup>ix</sup> Mandzufas J, Lombardi K, Johnston RS, Bivoltsis A, Howard J, Hooper P, et al. Where are the alcohol advertising hotspots near schools? *Health Promot J Austral.* 2024. <https://doi.org/10.1002/hpja.896>

<sup>x</sup> Crosland P, Howse E, Heenan M, et al. The value of primary prevention of alcohol consumption. An Evidence Check rapid review brokered by the Sax Institute for the Centre for Alcohol and Other Drugs, NSW Ministry of Health. 2022.

<sup>xi</sup> Australian Bureau of Statistics, Census of Population and Housing 2021. Compiled and presented in profile.id by .id (informed decisions).

<sup>xii</sup> Australian Bureau of Statistics, Census of Population and Housing 2021. Compiled and presented in profile.id by .id (informed decisions).

<sup>xiii</sup> Australian Institute of Health and Welfare. Risk factors to health [Internet]. Canberra: Australian Institute of Health and Welfare, 2017 [cited 2024 Sep. 25]. Available from: <https://www.aihw.gov.au/reports/risk-factors/risk-factors-to-health>

<sup>xiv</sup> Crosland P, Angeles MR, Ananthapavan J. 2022. Economic costs of alcohol-related harms in New South Wales: Development of an interactive costing tool. *The University of Sydney, Sydney, Australia.* Full report available at <https://preventioncentre.org.au/wp-content/uploads/2022/11/Economic-costs-of-alcohol-related-harms-in-NSW-report-.pdf>

<sup>xv</sup> Livingston M., Wilkinson C., and Room R., Community impact of liquor licences: An Evidence Check rapid review brokered by the Sax Institute ([www.saxinstitute.org.au](http://www.saxinstitute.org.au)) for the NSW Ministry of Health. 2015.