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22 December 2015

The Honourable John Rau MP
C/- Consumer and Business Services
By email: CBSReforms@sa.gov.au

Dear Minister Rau

Liquor Licensing Discussion Paper: City of Playford Submission

Thank you for providing the opportunity to input into the review of the Liquor Licensing framework.

The impacts of alcohol on the community are well understood, with alcohol being responsible for, or contributing to¹:

- 30% of road accidents
- 16% of child abuse cases
- 12% of suicides
- 10% of industrial accidents
- approximately 12,500 hospitalisations in South Australia each year
- approximately 600 deaths in South Australia each year
- 65% of serious assaults

With this in mind, the City of Playford has considered the Liquor Licensing Discussion Paper and has endorsed the following response, for your consideration:

Red Tape

In-principle support is provided for the streamlining of the liquor licensing application process, provided that the result does not impose an undue resource burden on Council. The potential integration of planning and liquor licensing processes will also need to be seamless and workable for all parties.

The notification of councils regarding applications for new licensed premises or amendments to conditions for existing licensed premises is requested to continue. Councils should have the opportunity to intervene (outside of confirming planning consent) where they see fit so that they are able to provide a voice for the community. This level of intervention currently varies from council to council as evidenced by differing policy positions (the City of Playford currently does not form a position on applications, except those on or adjacent to Council land). However, the ability for each council to establish their own position and respond to local and potentially changing circumstances is important.

¹SA Health

<http://www.sahealth.sa.gov.au/wps/wcm/connect/public+content/sa+health+internet/about+us/health+statistics/alcohol+and+drug+statistics/alcohol+harm+statistics>



The planning system provides some scope for controlling the location of licensed venues and their design with respect to noise attenuation, on-site car parking and the like. However, the planning system does not provide suitable scope for councils to input into management issues such as hours of alcohol service, provision of security etc. The current liquor licensing process allows for these matters to be raised by councils as part of addressing community concerns around neighbourhood amenity and safety.

The ability for councils to declare short-term dry zones for community events is also supported provided it is with the agreement of the SA Police as the agency responsible for enforcement. The enforcement of dry zones being undertaken by councils is not supported, given the potential threat to personal safety that 'moving on' or issuing fines may present to employees.

Council is further concerned about the impacts of allowing the sale of alcohol in supermarkets in respect of evidence that shows a correlation between the availability of alcohol and alcohol-related problems, particularly violence². Therefore increasing the scope for alcohol purchases beyond existing outlets warrants careful consideration. A recent United Kingdom study³ identified a link with increased sales of alcohol (and non-alcoholic products) that were placed on 'end-of-aisle' locations usually utilised for promotional purposes, demonstrating that even within a supermarket context product positioning and visibility has the capacity to influence purchaser behaviour. Concern has also been raised by the National Alliance for Action on Alcohol⁴ and the Australian Drug Foundation⁵ about the ability for supermarkets to offer alcoholic products at a cheaper price. Research has found that there is a link between the cost of alcohol and consumption levels: higher costs resulting in lower levels of consumption and lower costs resulting in higher consumption.⁶

A Safer Drinking Culture

Research indicates that increasing densities of licensed premises (hotels and bottle shops in particular) is associated with increased rates of assaults and domestic violence⁷. Therefore it is appropriate that some form of assessment of community impacts should be retained as part of the liquor licensing assessment process. A clear evidence-based framework for how these assessments are undertaken should be created that does not unreasonably impact on competition but is balanced with the broader social and health needs of the community.

Vibrancy

The introduction of small venue licences outside of the Adelaide CBD is supported, in respect of the role that these licences could play in increasing vibrancy and creation of employment opportunities. There should be criteria for when or where such licences are appropriate, which should be identified in consultation with councils. For example, within

² National Drug Research Institute (2007) *Restrictions on the Sale and Supply of Alcohol: Evidence and Outcomes*, Curtin University of Technology

³ Makamura, R et al (2014) Sales impact of displaying alcoholic and non-alcoholic beverages in end-of-aisle locations: An observational study, *Social Science & Medicine*, Vol. 108 pp. 68-73

⁴ National Alliance for Action on Alcohol (2014) *Submission to the Commonwealth of Australia on the National Competition Policy Review*, June

⁵ Australian Drug Foundation (2013) *Submission to the Inquiry into the Sale and Consumption of Alcohol by the Social Development Committee of the Parliament of South Australia*, May.

⁶ National Drug Research Institute, op. cit.

⁷ Donnelly, N et. al. (2014) *The effect of liquor licence concentrations in local areas on rates of assault in New South Wales*, NSW Crime and Justice Bulletin, Number 181, NSW Bureau of Crime Statistics and Research

the City of Playford, the Elizabeth Regional Centre may be one area that the small venue licences could be trialled.

Council believes that the role of assessing liquor licence applications should remain with the Commissioner or Licensing Court of South Australia but that local government should be provided the opportunity to be involved.

Once again, we thank you for providing the opportunity to input and look forward to being able to continue to be engaged during the review process.

If you would like clarification on any of the matters raised in this submission, please do not hesitate to contact Greg Pattinson, Senior Manager Strategy and Policy.

Yours sincerely

A handwritten signature in black ink, appearing to read 'G. Docherty', written in a cursive style.

Glenn Docherty
MAYOR, CITY OF PLAYFORD