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# Social Impact Assessment

Prepared for Strathfield Council

Extension of Trading Hours from 1am to 4am  
Monday to Saturday

At

136-144 Parramatta Road, Homebush

Prepared By

Design Collaborative Pty Ltd

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## Annexures

Annexure No.	Title	Prepared by	Date
1.	Plan of Management	Design Collaborative	November 2021

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## 1. Introduction and Executive Summary

This Social Impact Assessment (SIA) has been prepared to accompany a development application (*the Application*) made to Strathfield Council (Council) that seeks extended trading for a hotel to be known as the Homebush Hotel (*the Hotel*) located at 136-144 Parramatta Road, Homebush (*the Subject Site*).

The Hotel's existing trading hours under DA2019/057 are between 10am and 12 midnight, Monday to Sunday. The Application seeks to extend the Hotel's trading hours so that it can operate between 10am and 4am (the next day), Monday to Saturday. No change is proposed to the Hotel's existing hours of operation on Sunday. Sunday trade will remain between 10am and 12 midnight.

There is no requirement for a Social Impact Assessment or any guidelines to assess social impacts of a development in the Strathfield Local Environmental Plan 2012 (*the LEP*) and the Strathfield Development Control Plan (*the DCP*). Nevertheless, this Social Impact Assessment is provided to satisfy the Council that the Application's potential social impacts have been considered and that it would be in the public interest to grant consent for the Application.

This Social Impact Assessment will also form the basis of the Community Impact Statement required for the licensing application to Liquor & Gaming NSW upon approval.

The Application is accompanied by an updated Plan of Management (**Annexure 1**) that provides best practice controls and guidelines to ensure the responsible service of alcohol within the Hotel. It also includes provisions for security, acoustic recommendations, complaints register, and other operational details to ensure that the Application will not adversely impact surrounding sensitive land uses.

## 2. Methodology

### 2.1 Defining Social Impact

The International Association for Impact Assessment (IAIA) defines social impact as intended and unintended social consequences, both positive and negative associated with a planned intervention that affects people either directly or indirectly.<sup>1</sup>

Social impacts can be experienced either perceptually or physically and can impact individuals, families, social groups, workplaces and government agencies or the community more generally<sup>1</sup>.

For the purposes of this SIA, the above definition will be relied upon when assessing the potential for social impact arising from the Application.

#### 2.1.1 Alcohol-Related Harm

Of relevance to this SIA is the measurement of alcohol-related harm arising from the operation of a licensed premises within a locality. The *Global Strategy to Reduce the Harmful Use of Alcohol* endorsed by the World Health Organisation defines alcohol-related harm as follows.

*“...drinking that causes detrimental health and social consequences for the drinker, the people around the drinker and society at large, as well as the patterns of drinking that are associated with increased risk of adverse health outcomes.”*

Alcohol use and misuse exists as spectrum. In any society this ranges from (1) abstinence from alcohol to (2) moderate-level and low-risk consumption, (3) hazardous or 'risky' consumption, (4) harmful consumption, and through to (5) alcohol dependence.<sup>2</sup> Alcohol-related harm arises from the use of alcohol from categories (3)-(5). Alcohol-related harm can be further broken down into two separate sub-categories; being **acute** and **chronic** harm.

**Acute** – Acute alcohol-related harm is limited to short-term impacts and immediate risks associated with excessive consumption of alcohol and encompasses category (3) in the alcohol use spectrum. The most common acute alcohol-related harm includes accidental injuries, drink driving, assault (either victim or perpetrating), sexual violence, mental and behavioral disorders (such as intoxication, dependence syndrome), and intentional self-harm.<sup>3</sup>

**Chronic** – Chronic alcohol-related harm is associated with long-term health and social impacts associated with excessive consumption of alcohol and encompasses categories (4)-(5) of the alcohol use spectrum. Chronic alcohol-related harm can include a repetitive pattern of alcohol

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<sup>1</sup> Vanclay, Esteves, Aucamp and Franks (2015) Social Impact Assessment: Guidance for Assessing and managing the social impacts of Project, International Association for Impact Assessment

<sup>2</sup> McCune, A, Paton, A, & Touquet, R (eds) 2015, ABC of Alcohol, John Wiley & Sons, Incorporated, Queensland. Available from: ProQuest Ebook Central. [14 September 2020].

<sup>3</sup> Stevely, Abigail K, Holmes, John, McNamara, Simon & Meier, Petra S 2020, 'Drinking contexts and their association with acute alcohol-related harm: A systematic review of event-level studies on adults' drinking occasions', Drug and Alcohol Review, vol. 39, no. 4, pp. 309–320.

use which is actually causing physical or psychological harm.<sup>4</sup> Cognitive impairments such as anxiety and mood disorders, delirium and psychosis are also common **chronic** alcohol-related harms. Chronic social impacts include financial or health problems, family dysfunction, loss of employment and criminal activity. In extreme cases, chronic alcohol-related harm can lead to premature death.

For the purposes of this SIA, the above definition and sub-categories will be referred to when analysing the potential for alcohol-related harm amongst the community.

## 2.2 Defining Social Impact Assessment

The Planning Institute of Australia defines Social Impact Assessment as follows.

*“Social impact assessment refers to the assessment of social consequences of a proposed decision or action, namely the impacts on affected groups of people and on their way of life, life chances, health, culture and capacity to sustain these.”*

There is no standardised social impact assessment guidelines for social impact of a development at the local level. (i.e., non-state significant development) including within the Strathfield Local Government Area (LGA). Social impact assessments undertaken by both public and private bodies lack consensus in methodology which increases ambiguity and complicates the generalization of any results obtained from individual studies. Ricardo J. Bonilla-Alicea & Katherine Fu<sup>5</sup> describe social impact assessments in their article titled *Systematic Map of the Social Impact Assessment Field* as follows.

*“Social impact assessment provides a methodology for defining, monitoring and employing measures to demonstrate the benefits and/or harms created for target communities through evidence of social outcomes and impacts.”*

The methodology employed by this SIA is based on similar methodologies for SIA's required by local councils. This SIA is set out in accordance with the following methodology.

1. **The Goal and Scope Definition Phase:** Goal and scope definition involves setting out the parameters of the SIA, explaining the intended application, and outlining the set criteria in which social impact is to be measured.
2. **The Inventory Analysis Phase:** The inventory analysis phase involves the collection and quantification of the inputs and findings to be considered for the analysis. A population profile is generated based on these inputs and findings to identify existing underlying social problems within the community and infer potential social impacts that may arise from the Application.
3. **The Impact Assessment Phase:** The impact assessment phase involves an analysis of the characteristics of the Application and their potential to give rise to social impact. The phase

<sup>4</sup> McCune, A, Paton, A, & Touquet, R (eds) 2015, ABC of Alcohol, John Wiley & Sons, Incorporated, Queensland. Available from: ProQuest Ebook Central. [14 September 2020].

<sup>5</sup> Ricardo J. Bonilla-Alicea & Katherine Fu 2019, 'Systematic Map of the Social Impact Assessment Field', Sustainability (Basel, Switzerland), vol. 11, no. 15, accessed from MDPI Open Access Journals, accessed 7 August 2020.

is a synthesis of these measures and critical analysis of mitigation and management measures within the Application.

4. **The Result Interpretation Phase:** This phase involves the process of assessing the results from phases two and three of the study in the context of the performance reference points established in phase one in order to draw conclusions. This phase has the following objectives: to analyse the results, reach conclusions, and to make an adequate report of the results.

### 3. Goal and Scope Definition

The following section forms the Goal and Scope Definition of the SIA. This section describes the Subject Site & the Application (goal) and sets out the relevant criteria for the SIA (scope). The assessment criteria is formed from the performance reference points and interpretation of relevant statutory and strategic planning instruments, including the *Environmental Planning & Assessment Act 1979* and the *Liquor Act 2007*.

#### 3.1 The Subject Site

The Subject Site is located at 136-144 Parramatta Road, Homebush, and is legally described as Lot 8 in DP 1262238.



Figure 1: Aerial Image of the Subject Site (Source: Nearmap, 4 October 2021)

**DA2019/057** was approved on 7 November 2019 to demolish existing structures on the Subject Site and construct a mixed-use development comprising a hotel (which is the subject of this application), serviced apartments, and basement parking. As shown in **Figure 1** above, that development is currently under construction.

The under-construction Hotel will occupy most of the development's ground floor. Once complete, it will feature three main spaces for patrons:

- A sports bar containing the Hotel's main servery bar, space for dining, Tab and Keno and a large screen for viewing sporting events;
- A gaming room with a separate servery bar that is capable of accommodating 30 gaming machines; and
- A courtyard facing Parramatta Road which will be used for dining and drinking with a light-weight food stand providing light meals for patrons in the courtyard.

The courtyard will open off the sports bar, and the main access to those areas will be via the courtyard off Parramatta Road. The bulk of the courtyard will be covered with a weather-proof awning so that it can be used in all but the most inclement weather. While the gaming room will be accessible from the sports bar, its main entry will be from Loftus Lane on the eastern side of the building with a lesser entrance off that Lane at the rear of the building. A dedicated lift will provide access from the Hotel to the basement car park, where 16 spaces are available for its use.

The Hotel's approved hours of operation are 10am to 12am (midnight), seven days a week under DA2019/057. The use of the courtyard is restricted after 10 pm.

The Hotel's approved patron capacity is 350 persons until 10pm. Following 10pm, its maximum patron capacity is reduced to 280 persons.

### 3.2 Surrounding Area

The surrounding development is mixed as the area is in transition. Older developments are generally industrial in character, with motor vehicle showrooms and display yards along Parramatta Road and cottages away from that Road. Recent developments tend to be multi-storeyed, mixed-use buildings with ground-level commercial uses and dwellings on the upper floors.

Immediately to the east of the site, across Loftus Lane, is an extensive motor showroom and yard. The adjoining site to the west is developed with a multi-storeyed mixed-use building.

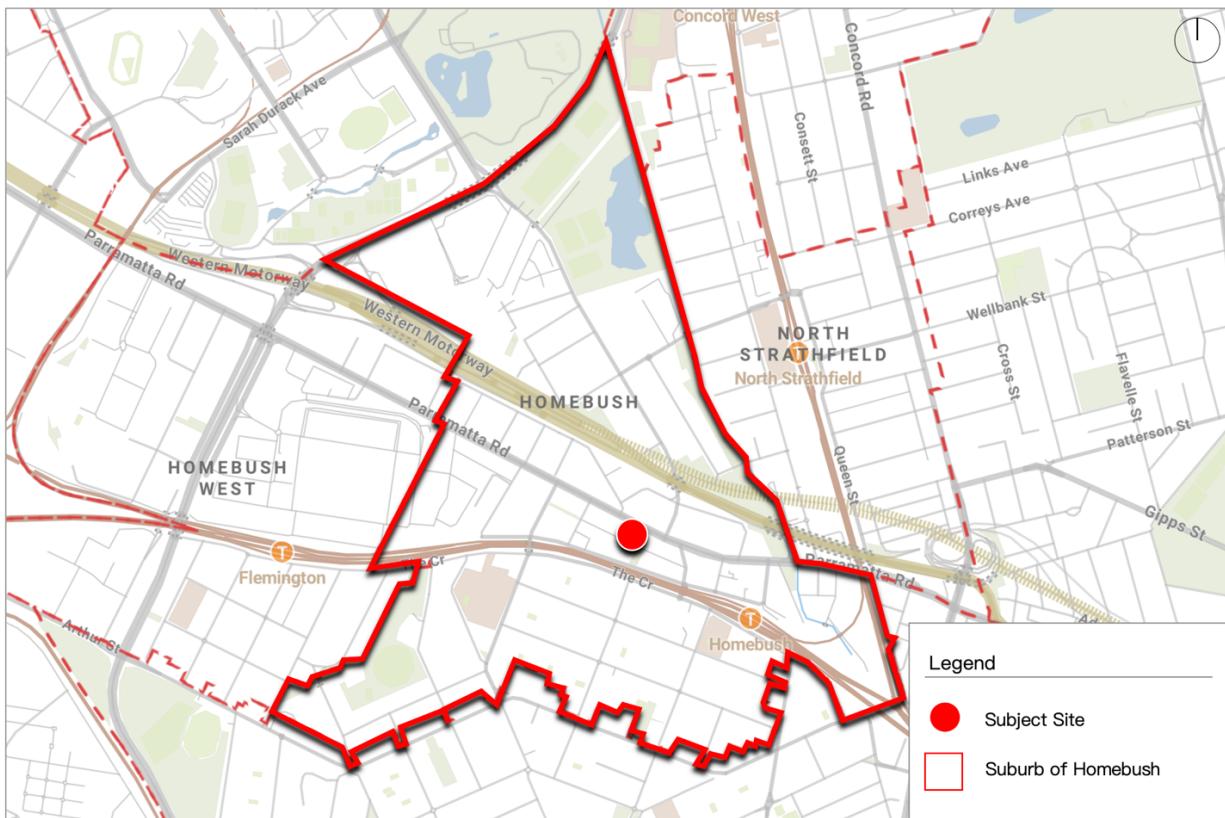
Opposite the site, across Parramatta Road, there is a large seven-storey mixed-use building. Directly across Loftus Lane to the south, there is a block of townhouses adjoined by public reserve on the east and a site under development on the west. Generally, the area between Loftus Lane and Loftus Crescent is being redeveloped with multi-storey, mixed-use buildings.

More broadly, the site lies in a band of development bounded to the north by the M4, to the south by the Great Western Railway Line and the Flemington Markets to the west.

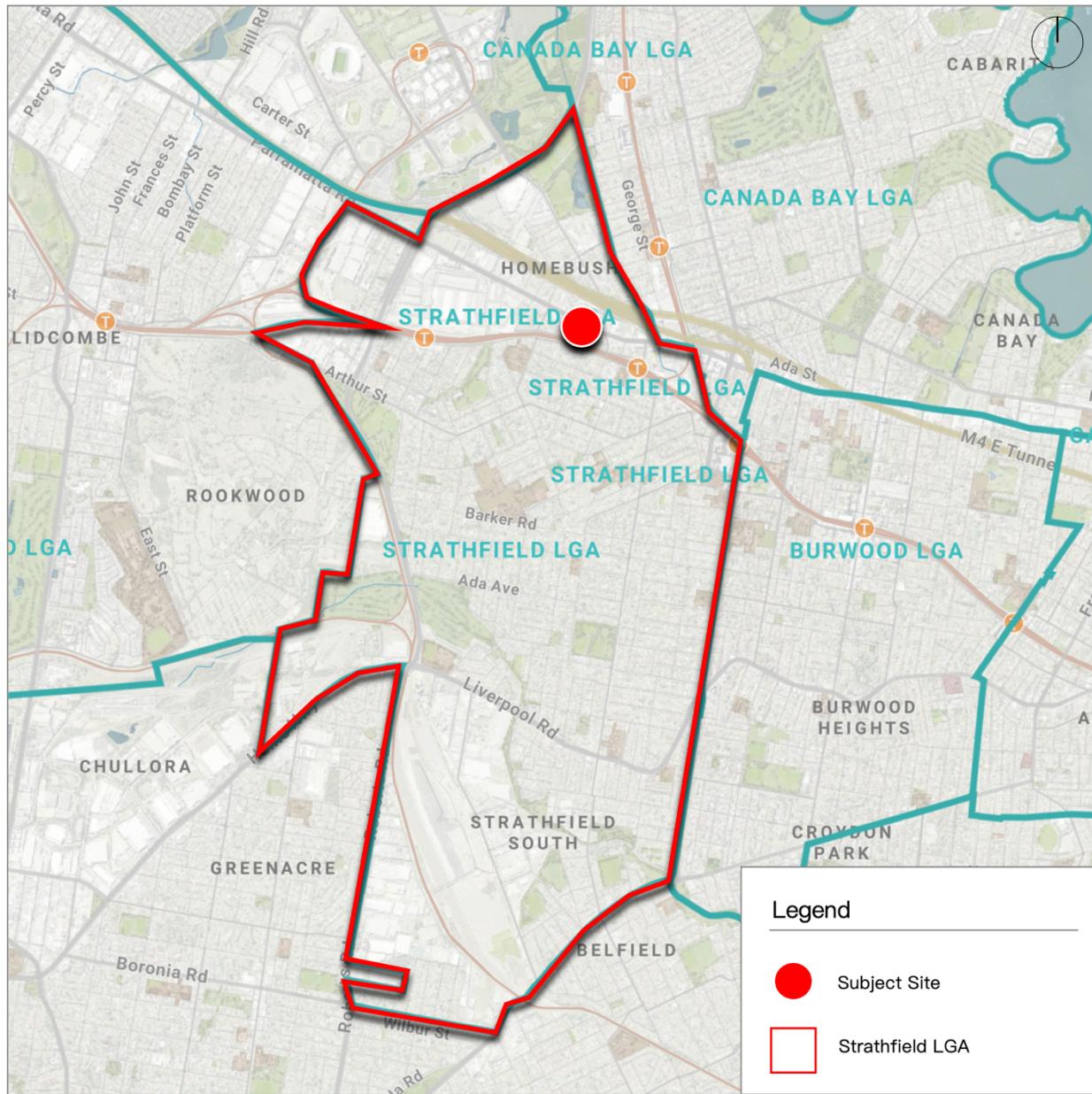
The Homebush railway station lies about 400 metres to the east and the Flemington railway station about a kilometre to the west.

### 3.3 Local and Broader Community

For the purposes of this SIA, the **Local Community** is defined as the state suburb of Homebush, as illustrated in **Figure 2** below. The **Broader Community** is defined as the Strathfield Local Government Area (LGA), as shown in **Figure 3** below.



**Figure 2** – Local Community – Homebush (Source: Mecone Mosaic)



**Figure 3 – Broader Community – Strathfield LGA** (Source: Mecone Mosaic)

### 3.4 The Application

This SIA accompanies a Development Application to extend the trading hours for the Homebush Hotel located at 136-144 Parramatta Road, Homebush.

The Hotel's existing trading hours under DA2019/057 are between 10am and 12 midnight, Monday to Sunday. The Application seeks to extend the Hotel's trading hours so that it can operate between 10am and 4am (the next day), Monday to Saturday. No change is proposed to the Hotel's existing hours of operation on Sunday. Sunday trade will remain between 10am and 12 midnight.

The Application is accompanied by an updated Plan of Management (**Annexure 1**) that includes the following provisions to mitigate the potential for additional social impact arising from the extended trading hours:

- Clause 16 restricting the Hotel's maximum patron capacity after 10pm to 280 persons per Condition 130 of DA2019/057.
- Clause 21 requiring the duty manager to arrange (without charge) for taxis to collect any patron from the Hotel if requested to do so.

The following management measures are also included in the updated Plan of Management based on the recommendations of the Acoustic Report accompanying the Application.

- Clause 14 restricting the use of the Hotel's loading dock between 7 am and 6 pm, daily.
- Deletion of Clause 15 (ii), which allowed six persons to congregate in the garden airlock between the Sports Bar and the gaming room at any one time, and its replacement with Clause 22 stating "*The garden airlock between the sports bar and gaming room is a transit space. Management shall ensure that the area is not used for any other purpose other than travel between these spaces.*"

The Plan of Management contains existing provisions that mitigate the potential for additional social impact arising from the extended trading hours. These include:

- Clause 41 & 42 requiring the engagement of at least one security person at the Hotel each evening from 8pm until 30 minutes after closing time. Their duties include monitoring patron behaviour and intervening to ensure there is no unreasonable adverse impact on the amenity of the building or surrounding area.
- Clauses 19 to 23 detailing the Hotel's Responsible Service of Alcohol and conduct of the gaming room provisions.
- Clause 44 requiring the installation and operation of CCTV cameras at designated strategic locations throughout the Hotel

- Clause 55 detailing the Hotel's methods for monitoring and controlling patron numbers to ensure compliance with the maximum permitted patron capacity.
- Clause 25 requiring the implementation of an Incident Register.

## 3.5 Assessment Criteria

### 3.5.1 Environmental Planning & Assessment Act 1979

The relevant objectives under Section 1.3 of the *Environmental Planning & Assessment Act 1979* are:

- (a) *To promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,*
- (c) *To promote the orderly and economic use and development of land,*

The relevant criteria under Section 4.15 of the *Environmental Planning & Assessment Act 1979* are:

- (1) *Matters for Consideration – General; In determining a development application, a consent authority is to take into consideration such of the following matters as are of relevance to the development the subject of the development application –*
  - (a) *The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,*
  - (e) *The public interest.*

### 3.5.2 Liquor Act 2007

The relevant objectives under section 3 of the *Liquor Act 2007* are as follows.

- (1) *The objects of this Act are as follows:*
  - (a) *to regulate and control the sale, supply and consumption of liquor in a way that is consistent with the expectations, needs and aspirations of the community,*
  - (b) *to facilitate the balanced development, in the public interest, of the liquor industry, through a flexible and practical regulatory system with minimal formality and technicality,*
  - (c) *to contribute to the responsible development of related industries such as the live music, entertainment, tourism and hospitality industries.*
- (2) *In order to secure the objects of this Act, each person who exercises functions under this Act (including a licensee) is required to have due regard to the following:*

- (a) the need to minimise harm associated with misuse and abuse of liquor (including harm arising from violence and other anti-social behaviour),
- (b) the need to encourage responsible attitudes and practices towards the promotion, sale, supply, service and consumption of liquor,
- (c) the need to ensure that the sale, supply and consumption of liquor contributes to, and does not detract from, the amenity of community life.

The Independent Liquor and Gaming Control Authority (the Authority) has legislated criteria upon which it must assess licence applications and Community Impact Statements (CIS), under sections 45 and 48 as follows.

- (3) The Authority must not grant a licence unless the Authority is satisfied that:
  - (a) the applicant is a fit and proper person to carry on the business or activity to which the proposed licence relates, and
  - (b) practices will be in place at the licensed premises as soon as the licence is granted that ensure, as far as reasonably practicable, that liquor is sold, supplied or served responsibly on the premises and that all reasonable steps are taken to prevent intoxication on the premises, and that those practices will remain in place, and
- (5) The Authority must not grant a licence, authorisation or approval to which a relevant application relates unless the Authority is satisfied...
  - That the overall social impact of the licence, authorisation or approval being granted will not be detrimental to the well-being of the local or broader community.

In addressing the potential for detriment arising from an application on the well-being of the community we have had regard to the assessment Guidelines issued by the Independent Liquor Gaming Control Authority (the ILGA Guidelines) for social impact assessments.

### 3.5.3 Strathfield Local Environmental Plan 2012

There are no guidelines for the preparation of social impact assessments within the Strathfield Local Environmental Plan 2012 (the LEP). The relevant aims of the LEP are as follows:

- (2) The particular aims of this Plan are as follows—
  - (aa) to protect and promote the use and development of land for arts and cultural activity, including music and other performance arts,
  - (a) to achieve high quality urban form by ensuring that new development exhibits design excellence and reflects the existing or desired future character of particular localities and neighbourhoods in Strathfield,

- (b) to promote the efficient and spatially appropriate use of land, the sustainable revitalisation of centres, the improved integration of transport and land use, and an appropriate mix of uses by regulating land use and development,
- (c) to promote land uses that provide a wide range of employment, recreation, retail, cultural, service, educational and other facilities for the local community,
- (d) to provide opportunities for economic growth that will enhance the local community,
- (e) to promote future development that integrates land use and transport planning, encourages public transport use, and reduces the traffic and environmental impacts of private vehicle use,
- (f) to identify and protect environmental and cultural heritage,
- (g) to promote opportunities for social, cultural and community activities,
- (h) to minimise risk to the community by identifying land subject to flooding and restricting incompatible development.

Under the LEP, the Subject Site is identified as located within the B4 Mixed Use zone with the following relevant objectives;

- To provide a mixture of compatible land uses.
- To integrate suitable business, office, residential, retail and other development in accessible locations so as to maximise public transport patronage and encourage walking and cycling.
- To facilitate mixed use urban growth around railway stations and transport nodes and corridors, commercial centres and open space.
- To provide local and regional employment and live and work opportunities.

### 3.5.4 Summary of Applicable Criteria

Based on the foregoing, it is considered that this SIA (and other documentation submitted with the development application) is required to demonstrate first and foremost an objective to minimise harm associated with the misuse and abuse of liquor through:

- Appropriate regulation on the sale, supply and consumption of liquor, so far as it is possible, so that it does not detract from the amenity of community life; and
- Balance that against the development of the hospitality industry by encouraging responsible attitudes and practices toward sale, supply and consumption of liquor.

Consistent with determinations made by the Authority, a satisfactory assessment with respect to social impact requires positive assessment of a two-limb test. That is, demonstration that the

relevant community is not presently encumbered by an unacceptable level of adverse social impacts and that appropriate practices or provisions, as noted above, will encourage the responsible sale and consumption of liquor so as not to contribute adversely to the present level of social impact.

### 3.6 Matters Excluded from This Assessment

The impacts associated with gaming machines are prohibited from being considered under the *Environmental Planning & Assessment Act 1979* pursuant to s. 209 of the *Gaming Machines Act 2001*;

- (3) A consent authority (within the meaning of the *Environmental Planning and Assessment Act 1979*) cannot:
  - (a) as a condition of any development consent under that Act, prohibit or otherwise regulate or restrict the installation, keeping or operation of approved gaming machines in a Tavern or on the premises of a club or any other premises, or
  - (b) refuse to grant any such development consent to a Tavern or club for any reason that relates to the installation, keeping or operation of approved gaming machines in a Tavern or on the premises of a club.
- (4) The installation, keeping or operation of an approved gaming machine in a Tavern or on the premises of a club is not an activity for the purposes of Part 5 of the *Environmental Planning and Assessment Act 1979*.

The above provisions were considered in detail in the Land and Environment Court case *Waugh Hotel Management v Marrickville Council (2007) 156 LGERA 414*. It is concluded that the above provisions restrict Council from refusing development consent or imposing conditions on any consent issued because of the proposed presence of gaming machines. Consequently, gaming related matters are not considered in this SIA.

## 4. Late Night Operation

The late-night operation of the Hotel will provide an additional venue to service the portion of the population that undertakes shift work. In 2009, there were 8.6 million (aged 15 years and over), of which 1.4 million worked shift work, equivalent to some 16% of the working population in Australia.

A higher proportion of men (17% compared with 15%) worked as shift workers. Younger population are more likely to be taking up shift work, demonstrated by 18% of people aged 15-19 and 18.3% of people aged 20-24. The percentage of shift workers decreases with age with 10.7% of people over age 65 worked as shift workers. This is largely attributed to the nature of work performed different age groups, with 20% of younger population (15-19) working in accommodation and food services industry.

Male shift workers most commonly work in community and personal service workers(54%), with 46% of these worked as protective service workers (46%).

Female shift workers most commonly work in community and personal service workers (29%), with 40% of these worked as carers and aides.

Professionals have a relatively low proportion of shift work (12%) due to the size of the occupation group, but has a high number of shift workers (16% of all shift workers). Amongst Professionals who work shift work, health professionals take up 75%.

The highest proportion of shift workers by industry was mining (52%) for male, and health care and social assistance for female (32%). Health care and social assistance had the most shift workers (342,900, equivalent to 25% of all shift workers), whilst the Accommodation and food service industry also has a high proportion of shift workers (37%).

It is important that Planning takes in account the need to provide services for the shift working population, as well as those that find themselves in need of services and assistance through the evening. Pubs, restaurants, cafes, libraries and the like are often called "third places". That is a place outside your home (first place) and work (second place). They are important facilities for a community's wellbeing and mental health as these are places where people gather primarily to socialise and enjoy each other's company. The benefits of third places provide people with a chance to wind down and express their emotions.<sup>6</sup>

A third place is a publicly accessible place outside of home and work that is simply there, yet often taken for granted, providing opportunities for experience and relationships that are otherwise unavailable.<sup>7</sup> Whilst it can be any free public space such as sporting clubs or libraries, third places are most often pubs purely because they are readily accessible at odd hours when activities are most limited.

<sup>6</sup> Oldenburg R & Brissett D 91982) The Third Place, Qualitative Sociology 5, 265-284

<sup>7</sup> Oldenburg R & Brissett D 91982) The Third Place, Qualitative Sociology 5, 265-284

The hotel is a dominant third place in Australian society where patrons can socialise after work or engage in conversations with other patrons that happen to chance upon the Hotel at the same time.

It is considered important for the health and vitality of a locality such as Homebush and the Strathfield LGA more broadly to provide venues that facilitate these needs and provide a location for respite and safety when it is needed. It is not in the public interest to have highly densely populated areas with a mix of workers and not provide them services. There are limited late-night opportunities for commerce, socialisation, food, safety and entertainment outside of gambling, especially after 1 am. Gaming and alcohol consumption is largely the only late-night entertainment available. In the absence of other entertainment options it is unsurprising that late-night pub patrons partake in these past times.

In this regard, hotels are well placed to provide an increased variety of services, underpinned by the profitability of gaming that removes the need for intensive commercialisation of the sale of liquor or entertainment and large numbers of patrons which can have adverse impacts on the local community.

In order to ensure that the Hotel provides a variety of services and can provide a venue for safe respite and socialisation, the following services and commitments have been enshrined into the proposed Plan of Management:

- Hot meals options and other snacks are to be available throughout the entire night and / or permission for patrons to order third party foods to the Hotel.
- Availability of television, providing sports or other entertainment.
- Non-alcoholic drinks including hot drinks like coffee and tea.
- No requirement to make purchases at the Hotel in order to attend the Hotel or use its facilities.
- Provision of minimum staff and security to enforce good behaviour, RSA and dress codes to create a safe and welcoming space.

## 5. Inventory Analysis

The following section forms the Inventory Analysis of the SIA and involves collecting and quantifying the **inputs** and **findings** to be considered for the analysis. The potentially affected community is the Local Community (State suburb) and the Broader Community (Local Government Area).

### 5.1 Demographics

**Input:** Demographics for the Local and Broader Communities have been extracted from the 2016 Australian Census Data. Demographic data is considered to be indicative of *acute* alcohol-related harm.

#### Population

#### **Relevant Research**

Alcohol is a major contributor to the premature death and excess morbidity among Aboriginal Australians, with traditionally high rates of aboriginal deaths from external causes recorded nationwide each year.<sup>8</sup> However, analysis of alcohol consumption rates amongst Aboriginal Australians reveal that estimates of drinking risk vary greatly within and between indigenous Australian communities.

The National Drug Survey Household 2016 found that overall; Indigenous Australians were more likely to abstain from drinking alcohol than non-indigenous Australians (31% compared with 23% respectively) and this has been increasing since 2010. There are variations amongst communities, particularly between remote, very remote and urban populations. The National Aboriginal and Torres Strait Islander Social Survey 2014-2015 found decreases in alcohol consumption rates (including consumption exceeded lifetime and single occasion risk guidelines) in both remote and non-remote communities, with non-remote communities recording the largest decreases.

**Table 1 - Population**

Population	Homebush	%	Strathfield (LGA)	%	NSW	%
Male	3,739	53.3	20,434	50.7	3,686,014	49.3
Female	3,270	46.7	19,874	49.3	3,794,217	50.7
ATSI	19	0.3	116	0.3	216,176	2.9

In the 2016 Census, there were 7,007 people in Homebush with a median age of 31. Of these, 53.3% were male, and 46.7% were female.

In the 2016 Census, there were 40,312 people in the Strathfield LGA with a median age of 32. Of these, 50.7% were male, and 49.3% were female. The populations of Homebush and the

<sup>8</sup> 'Patterns of Alcohol Consumption in the Kimberley Aboriginal Population'; Ernest M Hunter, Wayne D Hall and Randolph M Spargo, The Medical Journal of Australia, June 1992.

Strathfield LGA are significantly younger than the NSW and median and contain a higher proportion of males.

Aboriginal and/or Torres Strait Islander people made up of 0.3% of the population in both the Local Community and Broader Communities, lower than the 2.9% average in NSW.

**Findings:** Historical research has shown that Aboriginal and Torres Strait Island peoples are more susceptible to chronic alcohol-related harm. With a lower population of Aboriginal and Torres Strait Islanders, the Application is unlikely to adversely impact the indigenous population in the Local and Broader Community.

### Age

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### **Relevant Research**

Young persons are said to be more susceptible to adverse alcohol related impacts as a result of a higher propensity to binge drink and acute intoxication. Roche, et al "Young People and Alcohol the role of cultural influences" [NCETA 2008] found that there were significant factors other than availability that influenced drinking choices. These included pricing, legislation, policing and peer pressure.

**Table 2 - Age**

Age Group	Homebush	%	Strathfield (LGA)	%	NSW	%
0-14 years	1,004	14.3	6,224	15.4	1,386,328	18.5
15-19 years	400	5.7	2,441	6.1	448,425	6.0
20-24 years	720	10.3	3,854	9.6	489,673	6.5
25-29 years	1,128	16.1	5,012	12.4	527,161	7.0
30-39 years	1,541	22	7,240	17.9	1,040,084	13.9
40-49 years	787	11.3	4,620	11.5	995,609	13.3
50-64 years	932	13.3	6298	15.6	1,375,316	18.4
65 + years	477	5.9	4,634	11.6	1,217,646	16.2

In Homebush, children aged 0-14 made up 14.3%, and people over 65 made up 5.9% of the population. The dominant age groups in Homebush are 20-24, 25-29 and 30-39.

In the Strathfield LGA, children aged 0-14 made up 15.4%, and people over 65 made up 11.6% of the population. The dominant age groups in the LGA are 20-24, 25-29 and 30-39.

Both the Local and Broader Communities have a higher percentage of residents within the at-risk age group of 20-24 compared to NSW.

**Findings:** Based on the demographic data, the Local and Broader Communities have a significant proportion of residents aged 20-39. In particular, the most at-risk age group being young adults (20-24) is significantly higher when compared with the State average. This indicates a higher propensity to **acute** alcohol-related harm rising from harmful consumption of alcohol practices such as binge drinking within the Local and Broader Communities.

## 5.2 Education

**Input:** Educational data for the Local and Broader Communities have been extracted from the 2016 Australian Census. Education data is considered to be indicative of **acute** and **chronic** alcohol-related harm in a community.

### Educational Attainment Levels

#### Relevant Research

One of the strongest predictors of consumed volume of alcohol and binge drinking frequency is lower educational attainment. A population survey of adults in England conducted in 2018<sup>9</sup> found that persons whose highest qualification was high-school level drank substantially more on a typical day and had a higher weekly unit intake than those with a university qualification. The survey also found a higher frequency of binge drinking activities in those with lower educational attainment. Similar results have been recorded amongst the drinking patterns of the Australian population.

**Table 3 - Education (People aged 15 years and over)**

Highest Educational Attainment	Homebush	%	Strathfield (LGA)	%	NSW	%
Bachelor Degree level and above	2,442	40.8	12,959	38.0	1,424,716	23.4
Advanced Diploma and Diploma level	511	8.5	2,812	8.2	543,142	8.9
Certificate Level III and IV	403	6.8	2188	6.5	903,919	14.9
Year 12	1,220	20.4	7,152	21.0	930,654	15.3
Year 11	149	2.5	862	2.5	203,574	3.3
Year 10	294	4.9	1,937	5.7	702,178	11.5
Year 9 or below	225	3.0	1,742	5.1	513,209	8.4
No Educational Attainment	58	1.0	421	1.2	54,870	0.9
Not stated	548	9.2	3,086	9.1	627,465	10.3

<sup>9</sup> Beard E, Brown J, West R, Kaner E, Meier P, Michie S (2019) Associations between socio-economic factors and alcohol consumption: A population survey of adults in England. PLoS ONE 14(2): e0209442. <https://doi.org/10.1371/journal.pone.0209442>

Of the population aged 15 and over, 40.8% in Homebush and 38.0% in the Strathfield LGA have attained a bachelor's degree level and above, significantly above the NSW average of 23.4%.

Overall, the Local and Broader Communities have attained a higher education level compared to the NSW average. This is demonstrated by a higher percentage of the population achieving a bachelor's degree and a lower percentage of the population with their highest educational attainment at Certificate III and IV or high school level.

**Findings:** It is evident that the Local and Broader Communities are highly educated, with levels of tertiary qualification significantly higher than the NSW average. This indicates a lower propensity for harmful consumption of alcohol practices amongst the community, and therefore a lower susceptibility to **acute** and **chronic** alcohol-related harm.

## 5.3 Employment

**Input:** Employment data for the local and broader communities has been extracted from the 2016 Australian Census. Employment data is considered to be indicative of **acute** alcohol-related harm in a community.

### Employment Rates

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#### *Relevant Research*

Unemployment is associated with increased susceptibility to psychiatric problems such as substance (alcohol) use disorder. The National Drug Research Institute and the Centre for Adolescent Health in their report "The Prevention of Substance Use, Risk and Harm in Australia: A Review of Evidence" found that social factors such as unemployment, income and insecure housing contributed to increased alcohol and other drug use in Australian communities. Amongst employed populations, research<sup>10</sup> has found that workers who were more likely to use alcohol at risky and high risk levels were often: residents in the Northern Territory, Indigenous, born in Australia, mainly spoke English at home, single, had no dependent children, had a high school education or less, or had a household income of \$140,000 or more.

However recent research has found countercyclical associations between unemployment status and alcohol abuse. A 2017<sup>11</sup> study in the Journal of Social Science and Medicine found that the experience of three or more months of unemployment resulted in an increase of alcohol abuse, whilst short term (less than three months) resulted in a decrease. An increasing body of literature in academia is focusing on the link between employment and alcohol intake, and whether workforce participation rates and types of employment have any bearing on this relationship.

The Reserve Bank of Australia provides estimates for the degree of spare capacity and inflationary measures in the labour market as a benchmark for the given unemployment rate for any particular labour force. This benchmark, titled "non-accelerating inflation rate of

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<sup>10</sup> Roche, A, Pidd, K, & Shtangey, V 2007 'Alcohol Use in the Australian Workforce: Prevalence, Patterns & Implications', National Centre for Education and Training on Addiction.

<sup>11</sup> Boden, J, Lee, J, Horwood, L, Grest, C & McLeod, G 2017, 'Modelling possible causality in the associations between unemployment, cannabis use, and alcohol misuse', Social Science & Medicine, vol. 175, accessed from Elsevier ScienceDirect Journals Complete.

"unemployment" (or NAIRU), is often used interchangeably with the broader concept of full employment. The estimated NAIRU rate in Australia is currently 5%.<sup>12</sup>

**Table 4** - Employment – People who reported being in the labour force, aged 15 years and over

Employment	Homebush	%	Strathfield (LGA)	%	NSW	%
Worked full-time	2,418	61.7	12,678	60.1	2,134,521	59.2
Worked part-time	1,011	25.8	5,981	28.4	1,071,151	29.7
Away from work	198	5.0	957	4.5	174,654	4.8
Unemployed	294	7.5	1,473	7.0	225,546	6.3

There were 2,418 people who reported being in the labour force the week before Census night in the Local Community. Of these, 61.7% were employed full time, 25.8% were employed part-time, and 7.5% were unemployed.

There were 12,678 people who reported being in the labour force the week before Census night in the Broader Community. Of these, 60.1% were employed full time, 28.4% were employed part-time, and 7.0% were unemployed.

Both the Local and Broader Community have a higher proportion of residents who worked full time than the NSW average. Despite this, the Local and Broader Communities also have higher unemployment rates.

### Employment Type

#### Relevant Research

Pidd, et al<sup>13</sup> suggested that workplace culture is more significant in influencing alcohol consumption than levels of pay with those engaged in some industries exhibiting characteristics more conducive to over-indulgence than those in other industries. White-collar occupations did not feature among those where an alcohol-oriented culture prevailed.

<sup>12</sup> Tom Cusbert, Reserve Bank of Australia "Estimating the NAIRU and the Unemployment Gap"  
<https://www.rba.gov.au/publications/bulletin/2017/jun/pdf/bu-0617-2-estimating-the-nairu-and-the-unemployment-gap.pdf>

<sup>13</sup> Pidd, K, Berry J, Harrison J, Roche A, Driscoll T, Newson R 2006 'Alcohol and work – Patterns of use, workplace culture and safety' Australian Institute of Health and Welfare.

**Table 5** - Employment type – people aged 15 years and over

Occupation	Homebush	%	Strathfield (LGA)	%	NSW	%
Professionals	1,113	30.7	6,250	31.8	798,126	23.6
Managers	374	10.3	2,272	11.6	456,084	13.5
Clerical and Administrative Workers	473	13.1	2,729	13.9	467,977	13.8
Sales Workers	292	8.1	1,815	9.2	311,414	9.2
Community and Personal Service Workers	400	11.0	1,686	8.6	350,261	10.4
Technicians and Trade Workers	441	12.2	2,031	10.3	429,239	12.7
Labourers	312	8.6	1,541	7.9	297,887	8.8
Machinery Operators and Drivers	136	3.8	808	4.1	206,839	6.1

The top four occupations within the Local Community are Professionals (30.7%), Clerical and Administrative Workers (13.1%), Technicians and Trade Workers (12.2%), and Community and Personal Service Workers.

The top four occupations in the Broader Community are Professionals (31.8%), Clerical and Administrative Workers (13.9%), Managers (11.6%), and Technicians and Trade Workers (10.3%).

**Findings:** The Local and Broader Communities have moderately higher levels of unemployment compared to the NSW average. However, both Local and Broader Communities have higher proportions of full-time employment when compared to the NSW average. Both the Local and Broader Communities have a significantly higher proportion of white-collar workers and a significantly lower proportion of blue-collar workers when compared to the NSW average.

This indicates a lower propensity for harmful consumption of alcohol practices amongst the community, and therefore lower susceptibility to acute alcohol-related harm.

## 5.4 Income

**Input:** Income data for the Local and Broader Communities has been extracted from the 2016 Australian Census. Income data is considered to be indicative of potential [chronic](#) alcohol-related harm in a community.

## Relevant Research

A 2015 research article<sup>14</sup> on the correlation between income and alcohol misuse found that household income largely predicts a decrease in alcohol misuse over time because people with more money are less likely to "believe in luck and be more confident in their own abilities". These perceptions may help people control their alcohol intake. However, higher household income was found to be associated with increased alcohol misuse but less harm was seen to eventuate. That was found to be the case because people with lower incomes tend to be more religious and religiosity protects against excessive alcohol consumption, alcohol abuse and dependence. That can also be extrapolated to ethnicities that do not have strong drinking cultures.

**Table 6 - Income – People aged 15 years and over**

Median Weekly Income	Homebush	Strathfield (LGA)	NSW
Personal	729	682	664
Family	1,846	1,894	1,780
Household	1,810	1,781	1,468

In the Local Community, the median weekly personal income for people aged 15 years and over was \$729. In the Broader Community, the median weekly personal income for people aged 15 years and over was \$682. Both the Local and Broader Communities have higher income levels than the NSW average for personal, family, and household incomes. Differences in income are significant on all levels when compared to the state average.

**Findings:** Personal, Family and Household incomes were higher in the Local and Broader Community when compared to the NSW average, indicating that a lower proportion of the population is unlikely to practice harmful consumption of alcohol and misuse alcohol less, therefore a lower risk of chronic alcohol-related harm.

## 5.5 Community Diversity

**Input:** Country of birth data for the Local and Broader Community has been extracted from the 2016 Australian Census. This data is considered to be indicative of potential for acute and chronic alcohol-related harm in a community.

### Relevant Research

Persons born in Australia or other English speaking countries are more likely to consume liquor in a manner that would result in more immediate harm, e.g., drinking until intoxicated.<sup>15</sup> In 2015,

<sup>14</sup> Elliott, M & Lowman, J 2015, 'Education, income and alcohol misuse: a stress process model', Social Psychiatry and Psychiatric Epidemiology, vol. 50, no. 1, pp. 19–26.

<sup>15</sup> Trends in Alcohol Use and Health Related Harms in NSW, Report of the Chief Health Officer 2016, NSW Ministry for Health [p 10].

*almost half of all adults born in non-English speaking countries did not drink alcohol. This is substantially higher than those born in Australia or other English-speaking countries.*

**Table 7** - Country of Birth (as percentage of population)

Country	Homebush	Strathfield (LGA)	NSW
Australia	30.5%	36.7%	65.5%
China (Excludes SARs and Taiwan)	10.5%	10.0%	0.4%
South Korea	8.9%	7.7%	0.7%
Sri Lanka	5.4%	3.5%	1.6%
India	16.4%	10.9%	1.9%
Nepal	3.4%	2.9%	0.4%

In the Local Community, 30.5% of people were born in Australia. The most common countries of birth were China (Excluding SARs and Taiwan) (10.5%), India (16.4%), and South Korea (8.9%).

In the Broader Community, 36.7% of people were born in Australia. The most common countries of birth were China (excludes SARs and Taiwan) 10.0%, India (10.9%), and South Korea (7.7%).

**Findings:** Both the Local and Broader Communities have a significantly lower proportion of residents born in Australia or other English-speaking countries. This indicates that the population is less susceptible to **acute** or **chronic** alcohol-related harm, as persons born in Australia or other English-speaking countries have a higher propensity to consume liquor in excessive amounts.

## 5.6 Socio-Economic Indexes For Area (SEIFA)

**Input:** The following SEIFA Data for the Local and Broader Community has been extracted from the 2016 Australian Census. Socio-economic data is considered to be indicative of potential for **chronic** alcohol-related harm in a community.

### Relevant Research

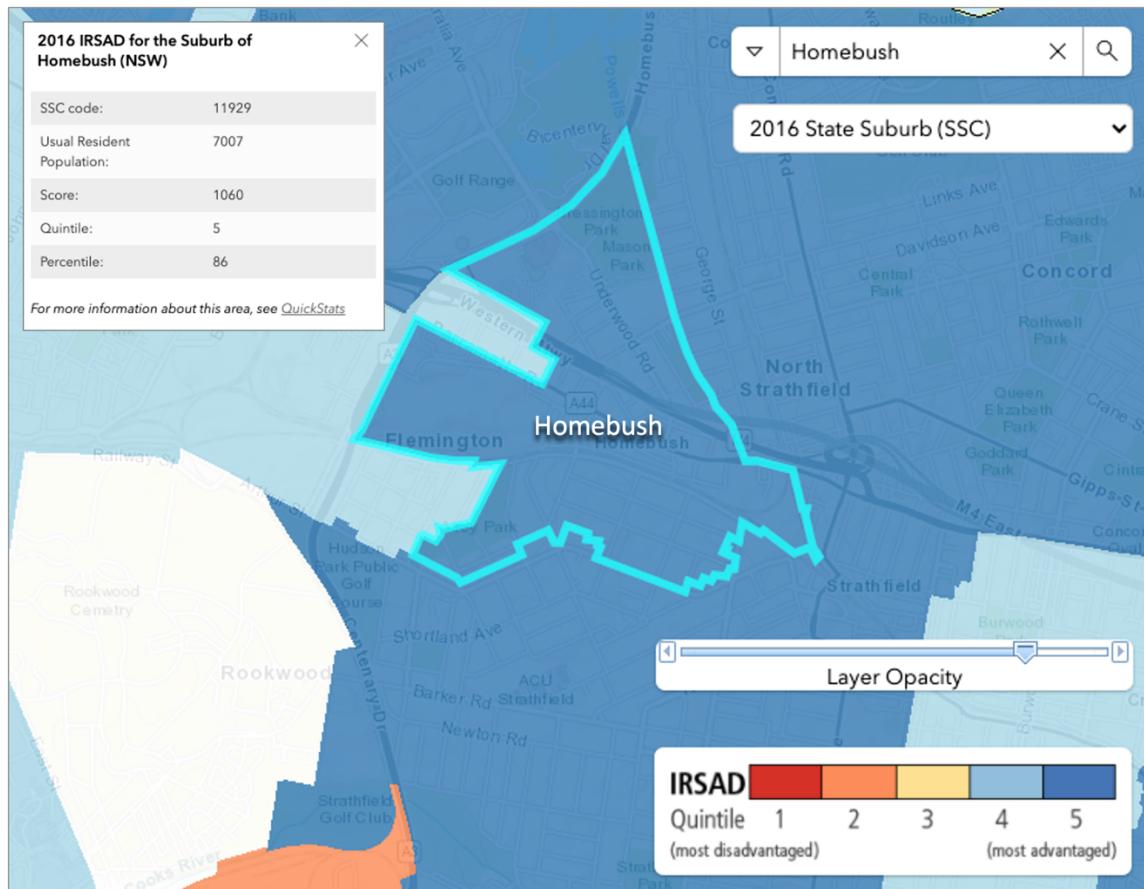
*It is often claimed that there is a positive correlation between socio-economic status and excessive consumption of alcohol. However, academic research on this relationship paints a*

different picture. A study conducted in 2008<sup>16</sup> examining socio-economic status and problem alcohol use found no consistent patterns in the course and severity of alcohol abuse by income category. Those in higher income categories were more likely to drink at least once per week but had fewer maximum drinks per drinking occasion.

It is often argued that people who are disadvantaged in terms of social status are more likely to abuse alcohol than those who are socially advantaged. The best measures that are available of social status are the Australian Bureau of Statistics' SEIFA (Socio-Economic Indexes for Areas) derived from the 2016 Census.

Guideline 6 explains that the "ABS SEIFA Data" as SEIFA data ranks areas in Australia according to relative socioeconomic advantage and disadvantage. The indexes are based on information from the five-yearly census including education, occupation, employment, income and housing.

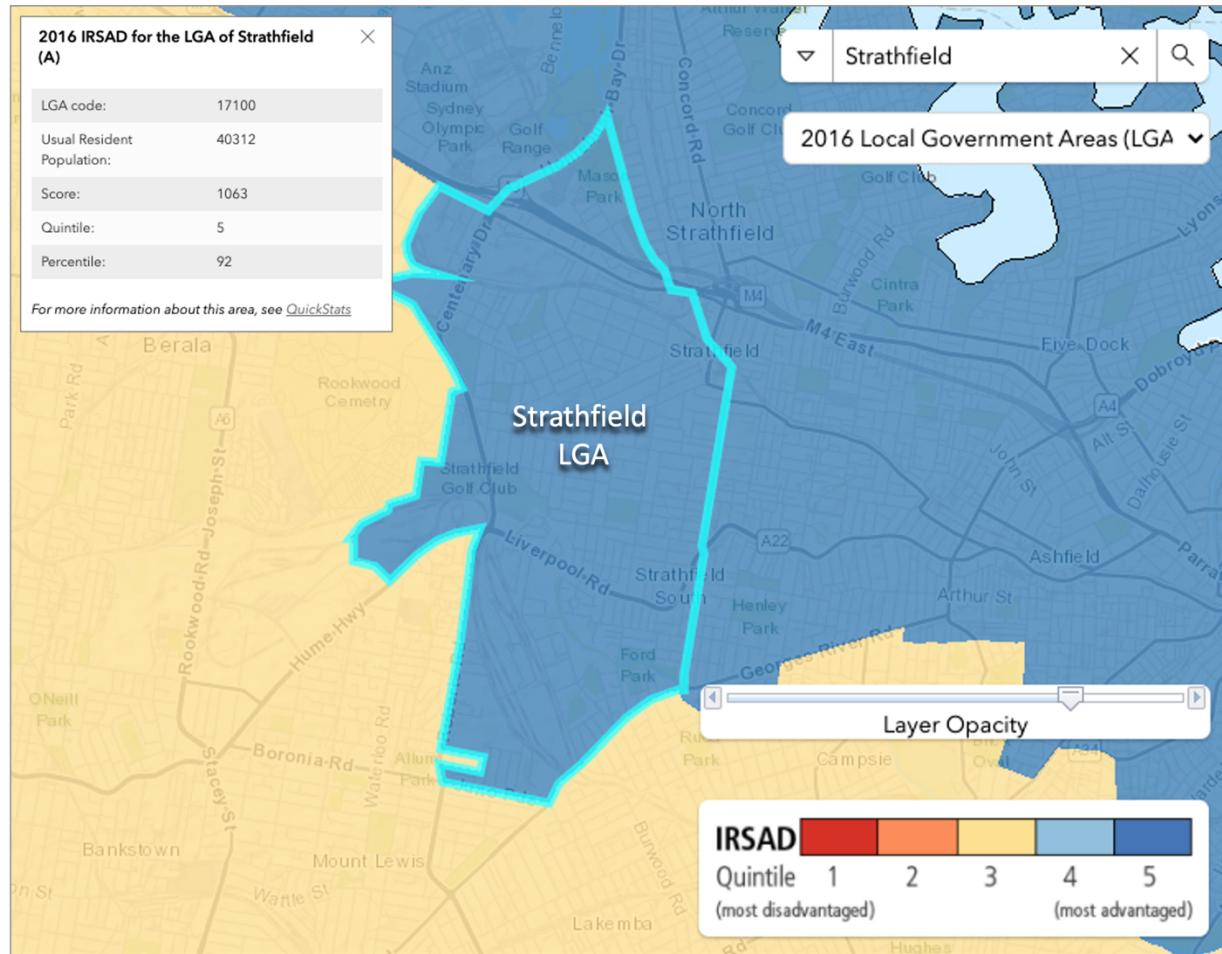
SEIFA scores are ranked, with the national datum, or average, being set at 1000.



**Figure 4 – IRSAD Score and Subject Site (Source: Australian Bureau of Statistics)**

<sup>16</sup> Keyes, K & Hasin, D 2008, 'Socio-economic status and problem alcohol use: the positive relationship between income and the DSM-IV alcohol abuse diagnosis', *Addiction*, vol. 103, no. 7, pp. 1120–1130, accessed from Wiley Online Library on 26 August 2020.

The SEIFA data demonstrates that the Local Community is one of the most advantaged suburbs. It is ranked in the 86<sup>th</sup> percentile with a SEIFA score of 1060.



**Figure 5** - Broader Community IRSAD Score (SEIFA) and Subject Site as identified in blue (Source: Australian Bureau of Statistics)

The SEIFA data demonstrates that the Broader Community is one of the most advantaged LGAs. It is ranked in the 92<sup>nd</sup> percentile with a SEIFA score of 1063.

**Findings:** Based on SEIFA data, the Local Community and Broader Communities are significantly socio-economically advantaged. Research has found that communities in the upper percentiles are more likely to drink on occasion but have fewer drinks per session, therefore less likely to practice harmful consumption of alcohol.

## 5.7 Bureau of Crime and Statistics and Research (BOCSAR)

The following data is sourced from the Bureau of Crime Statistics and Research.

### 5.7.1 Offence Rates – Local and Broader Community

**Input:** Data for the Local Community and Broader Community relating to different types of alcohol and non-alcohol related offences are summarised in the table below. This data has been extrapolated from the BOCSAR Data Mapping tool. Crime statistics is considered to be indicative of *acute* alcohol-related harm in a community.

<b>Offence (per 100,000)</b>	<b>Homebush</b>		<b>Strathfield (LGA)</b>		<b>NSW</b>	
	Rate	5 Year Trend	Rate	5 Year Trend	Rate	5 Year Trend
Domestic Assault	246.0	stable	247.2	stable	405.4	▲2.4% per year
Non-Domestic Assault	363.1	-	291.9	▼5.0% per year	381.0	▼1.9% per year
Malicious Damage to Property	398.3	▼17.5% per year	287.7	▼14.9% per year	659.0	▼4.7% per year
Alcohol-Related Domestic Assault	70.3	-	57.5	stable	115.7	stable
Alcohol-Related Non-Domestic Assault	82.0	-	49.0	-	98.3	▼7.1% per year

The rate of all offences within the Local and Broader Communities, including alcohol-related and non-alcohol-related crimes, are lower than the NSW average. In addition, malicious damage to property in the Local and Broader Communities and non-domestic assault in the Broader Community have shown a downward trend in the past five years. All other offences remain stable or “n.c.” (not calculated) due to the low number of counts for that specific offence.

**Findings:** The rate of all alcohol-related and non-alcohol-related offences within the Local and Broader Communities is significantly lower than the NSW average over the past five years, as seen in the figures above. This demonstrates that the population is less susceptible to acute alcohol-related harm.

## 5.7.2 Hotspots for Local Community (Homebush)

**Input:** The following figures illustrate hotspots within the Local Community for Domestic Assault, Non-Domestic Assault, and Malicious Damage to Property. Hotspot data is considered to be indicative of acute alcohol-related harm in a community.

### Relevant Research

Hotspots do not indicate high levels of incidents, merely higher levels of incidents as compared to the surrounding area. In addition, hotspot maps do not account for population density and transient populations. The following excerpt from Understanding Crime Hotspot Maps from NSW Bureau of Crime Statistics and Research summarises the prevalence of hotspots in Local Government Areas:

"A large proportion of the land within some LGAs will be covered by hotspots. These LGAs will have a high crime density relative to crime concentrations across the state. Often these LGAs will also have a large residential population and/or number of visitors to the area. It is important to remember that even though the crime density is high, the risk of victimisation may not be high once these populations are considered."

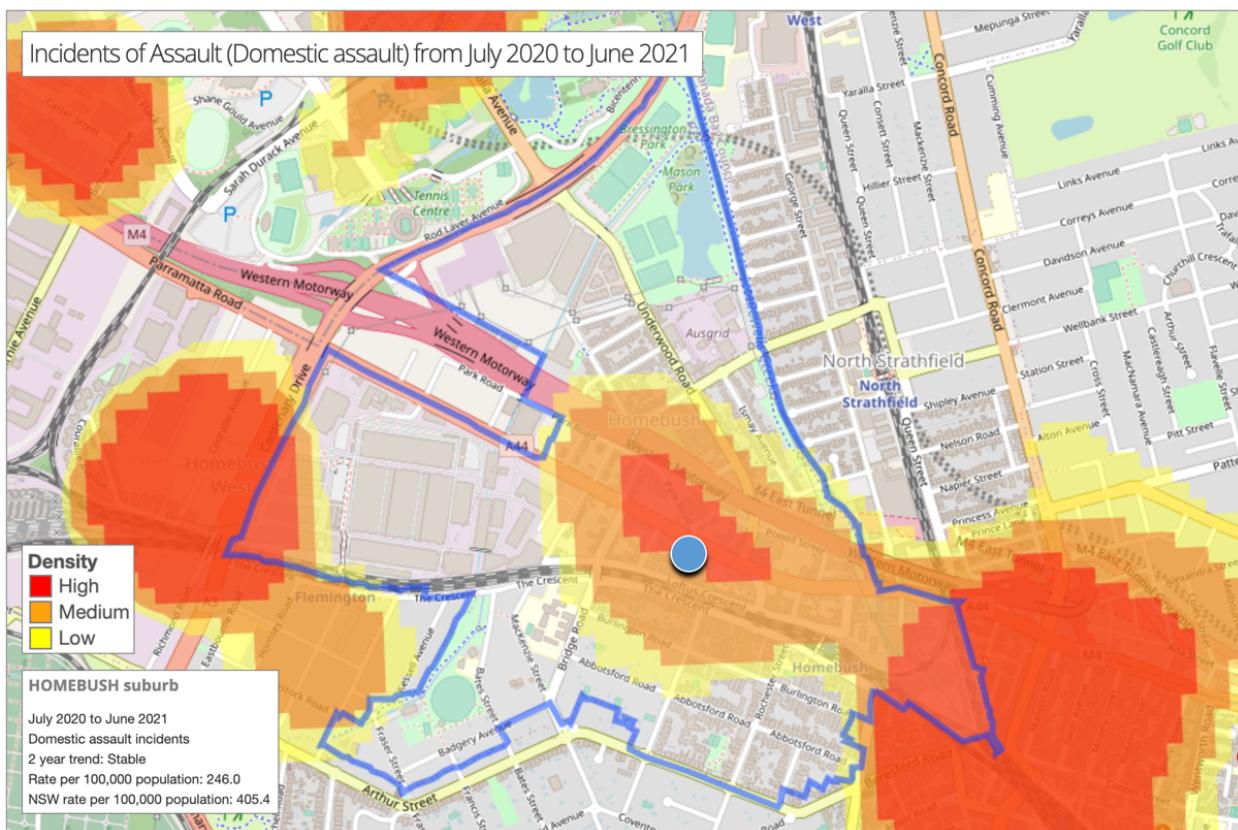


Figure 6 – Hotspots for Domestic Assault between July 2020 and June 2021 (source: BOCSAR)

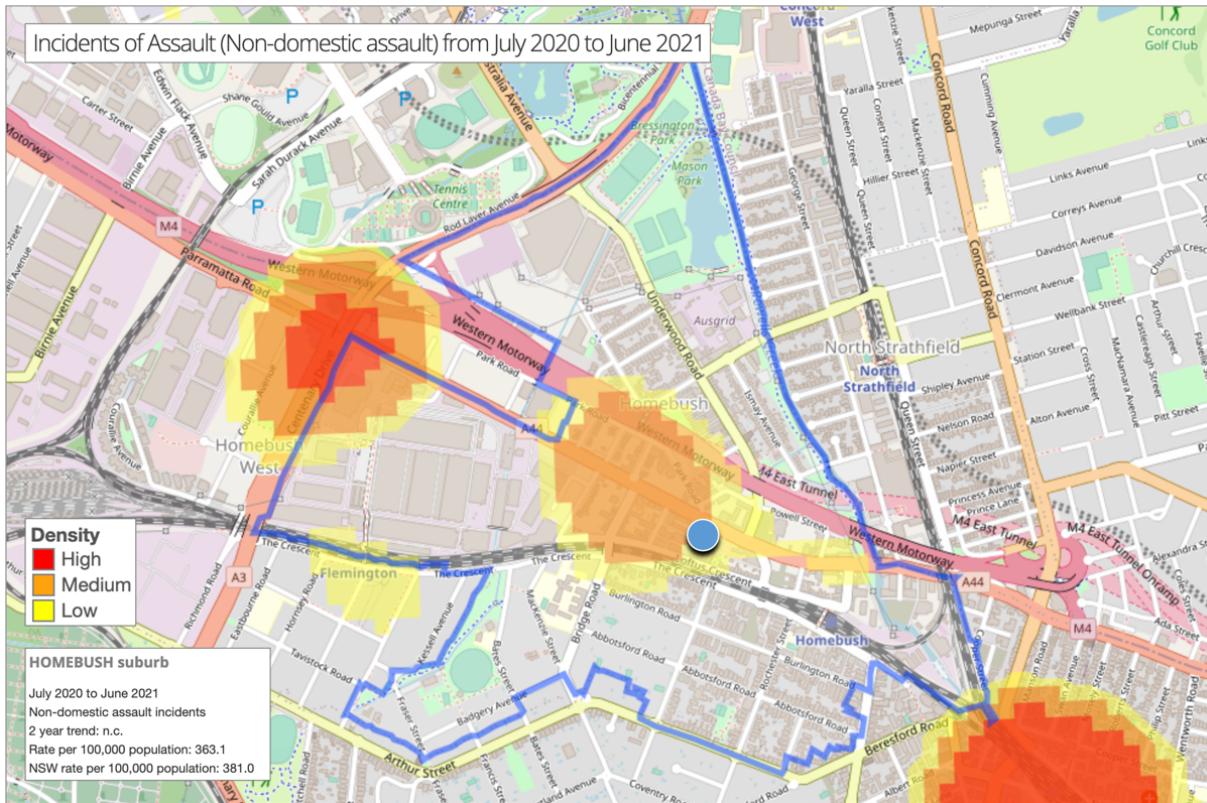


Figure 7 – Hotspot for Non-Domestic Assault between July 2020 and June 2021 (source: BOCSAR)

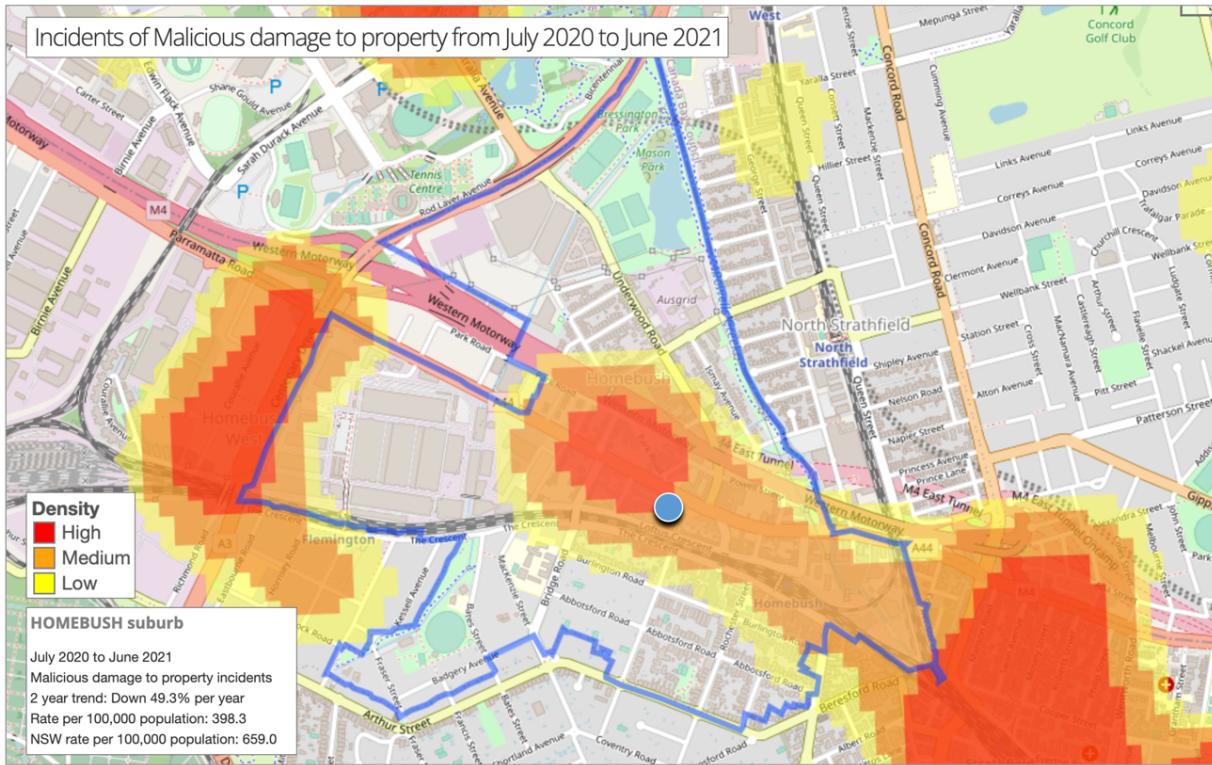


Figure 8 – Hotspots for Malicious Damage to properties between July 2020 and June 2021 (source: BOCSAR)

Hotspot mapping shows where reports of incidents of various types of crimes have been concentrated, graded into high, medium and low density. They are not indicative of the numbers of incidents reported and cannot be equated to the number generated in another hotspot of a similar grade.

Hotspots are commonly located near railway stations or in CBD centres, where it is easily accessible by public transport. It is only an economic decision as businesses choose to be situated in the busiest area in a town centre. Therefore such areas are more likely to have higher incidents.

**Findings:** The Subject Site is located within high density hotspots for domestic assault and malicious damage to property and a medium density hotspot for non-domestic assault. This indicates that the community's overall susceptibility to *acute* alcohol-related harm is moderate to high. However, the crime statistics in the previous section demonstrate that there is no increased risk for victimization. Moreover, the findings of table 8 show that rates of alcohol-related crime are lower than the NSW averages in the Local and Broader Communities.

## 5.8 HealthStats NSW Data

The following data is sourced from HealthStats NSW and related specifically to alcohol-related health problems and indicia.

### 5.8.1 Alcohol-Attributable Hospitalisations and Deaths

**Input:** Data relating to Alcohol-Attributable Hospitalisations and Alcohol-Attributable Deaths is summarised in the following table. Such health data is considered to be indicative of *acute* and *chronic* alcohol-related harm in a community.

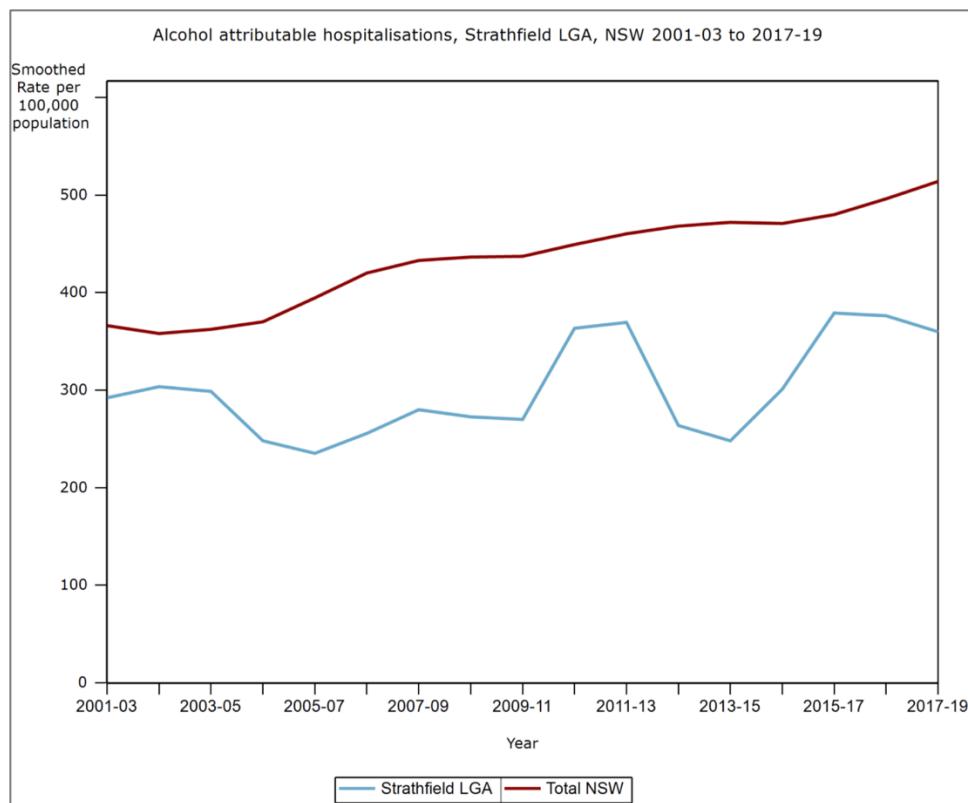


Figure 9 – Alcohol attributable hospitalisations for the Strathfield LGA from 2001 to 2019 (source: Healthstats)

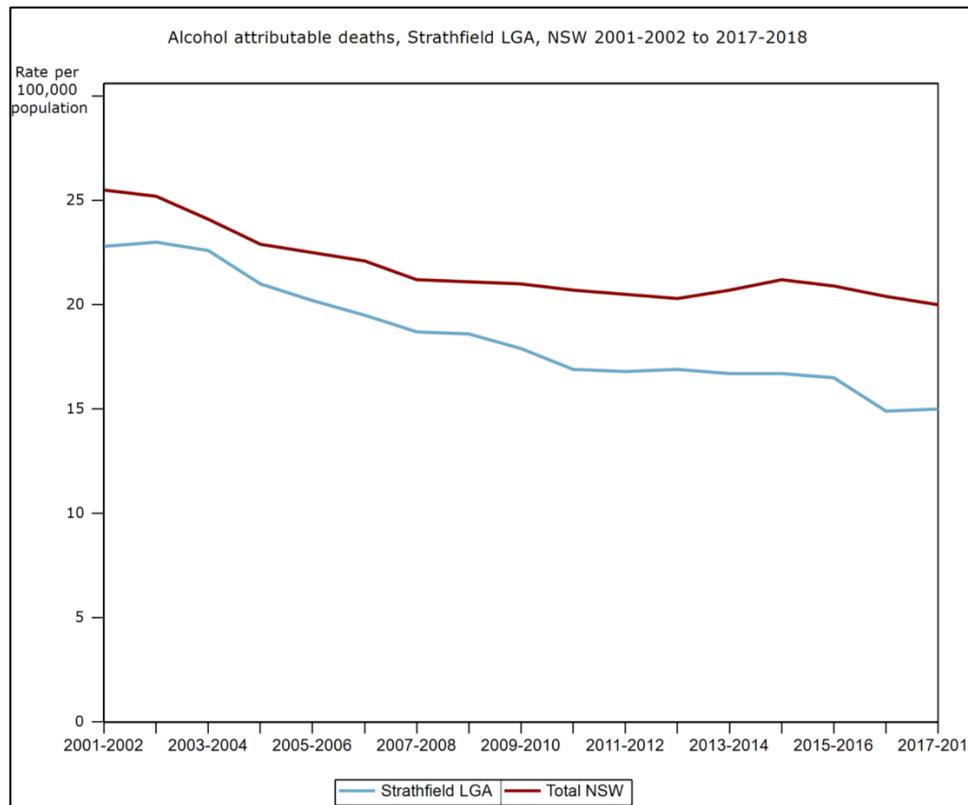


Figure 10 – Alcohol attributable deaths for the Strathfield LGA from 2001 to 2018 (source: Healthstats NSW)

Rates of alcohol-attributable hospitalisations within the Broader Community have consistently been lower than the NSW average. Similarly, rates of alcohol-attributable deaths have remained consistently lower than the NSW average.

**Findings:** The lower rates of alcohol-attributable hospitalisation and deaths compared to the NSW average can indicate a low susceptibility to **acute** and **chronic** alcohol-related harm.

## 5.9 Liquor & Gaming NSW LiveData

### 5.9.1 Outlet Density

Outlet density refers to the concentration of licensed premises in a local area. It is a supposed environmental risk that is said to encourage excessive drinking and alcohol-related harm. Outlet density can be assessed by measuring **outlet saturation** (number of licensed premises in an area as a proportion of the population) and **outlet clustering** (proximity of licensed premises in a local to one another).

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#### Relevant Research

High levels of outlet-density have been shown to be positively associated with higher levels of alcohol-related harm. Research conducted by the Task Force on Community Preventive Services in York 2009<sup>17</sup> found upon review of eighty-eight articles and books in academic literature, that greater alcohol outlet density was associated with increased alcohol consumption and related harms that included medical harms, crime and violence. Reduced alcohol outlet density may be an effective means of controlling excessive alcohol consumption and harms. The research conducted had some methodological problems and data limitation that limited the reliability of the author's conclusions; however, their findings have been generally accepted as accurate by the relevant liquor authority in NSW and are often used as a general proposition in the assessment of liquor licence applications.

Additional research conducted since 2009 has found that high levels of packaged liquor outlet-density have been shown to be positively associated with higher rates of alcohol-attributable morbidity and mortality<sup>18</sup> as well as higher rates of alcohol-related domestic violence assault.<sup>19</sup> Higher levels of Hotel outlet-density, and highly concentrated clusters of Hotels in an area have been shown to be positively associated with higher rates of alcohol-related non-domestic violence assaults.<sup>20</sup>

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<sup>17</sup> Campbell C A, Hahn R A, Elder R, et. al., 2009, 'The effectiveness of limiting alcohol outlet density as a means of reducing excessive alcohol consumption and alcohol consumption and alcohol-related harms', American Journal of Preventative Medicine, Vol. 37, No. 6, pp. 556-569. See: <https://www.ncbi.nlm.nih.gov/books/NBK76640/>

<sup>18</sup> Richardson, E. A. et. al., Is local alcohol outlet density related to alcohol-related morbidity and mortality in Scottish cities? Health Place. 2015 May; 33: 172-180, see: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4415114/>

<sup>19</sup> Donnelly D, Menendez P, Mahoney N, BOCSAR, "The effect of liquor licence concentrations in local areas on rates of assault in New South Wales", Crime and Justice Bulletin, no. 181, December 2015. See: <http://www.bocsar.nsw.gov.au/Documents/CJB/CJB181.pdf>

<sup>20</sup> Livingston M, 'Alcohol outlet density and assault: a spatial analysis', Addiction, 2008 April; 103(4): 619-28.

## 5.9.2 Outlet Saturation

**Input:** Outlet saturation is a measure of the number of liquor licences compared to the population. It is calculated per 100,000 residents in an area [i.e. (number of liquor licences/residential population) x 100,000]. The outlet saturation rates for the Local and Broader Community are displayed in the following table.

Liquor Licence Type	Homebush	Strathfield (LGA)	Major Cities of Australia (NSW)	All of NSW
Overall	256.9	161.2	185.9	207.3
Hotel	28.5	14.9	19.9	28.4

Outlet Saturation in the Local Community (256.9) is higher compared to the NSW average (207.3) and Major Cities of Australia (NSW) (185.9). Outlet Saturation in the Broader Community (161.2) is lower compared to the NSW average (207.3) and Major Cities of Australia (NSW) (185.9).

**Findings:** Outlet saturation in the Local Community is higher than the NSW average and the Major Cities of Australia; However, outlet saturation in the Broader Community is lower. As the Application seeks extended trading hours for an already approved Hotel, the Application will not increase the saturation of outlets in the Local or Broader Community.

## 5.9.3 Outlet Clustering

**Input:** Outlet clustering is a measure of liquor licences within a 1km radius in a locality under examination. The outlet clustering rates for the Local and Broader Community are displayed below.

Liquor Licence Type	Homebush	Strathfield (LGA)	Major Cities of Australia (NSW)	All of NSW
Overall	39.8	47.2	134.3	95.6
Hotel	2.5	2.7	27.1	15.3

Outlet clustering in the Local Community (39.8) is lower compared to NSW (95.6) and Major Cities of Australia NSW (134.3) averages. Outlet clustering of Hotels in the Local Community (2.5) is lower compared to NSW (15.3) and Major Cities of Australia (27.1).

Outlet clustering in the Broader Community (47.2) is lower compared to NSW (95.6) and Major Cities of Australia (134.3). Outlet clustering of Hotels in the Broader Community (2.5) is significantly lower than NSW (15.3) and Major Cities of Australia NSW (27.1).

**Findings:** Outlet clustering in the Local and Broader Community is lower than that of NSW and Major Cities in Australia. Combined with saturation data, it is unlikely the extension of trading hours would have any additional adverse risk on the Local and Broader Community.

## 6. Impact Assessment

The following impact assessment analyses the characteristics of the proposed development, Crime Prevention Through Environmental Design (CPTED) principles and harm minimisation strategies to scope the potential for social impact. **Findings** are generated for each of the topics analysed. Recommendations are made throughout this section where relevant.

### 6.1 Characteristics of the Proposed Development

Alcohol-related violence does not occur with equal frequency in all licensed premises. In inner Sydney for example, 12% of hotels and nightclubs accounted for almost 60% of all assaults at hotels and nightclubs and, in Newcastle, 8% of licensed premises accounted for almost 80% of all assaults that occurred on licensed premises.<sup>21</sup> As such, the specifics of the proposed Hotel must be understood if an accurate assessment is to be made of its potential to contribute to social impact.

In considering potential social impacts of a licensed premises, the following information has previously been considered relevant for assessment; viz:

- Type of venue, trading hours and capacity.
- Overall ambience, as can be inferred from the proposed drawings.
- The style of entertainment proposed to be provided.

#### 6.1.1 Type of Venue, Trading Hours and Capacity

##### Type of Venue and Hotel Offering

The Hotel will be situated within a multi-storey mixed-use development along Parramatta Road. The venue's offerings (bar, lounge areas, and gaming room) will provide patrons with a vibrant and eclectic dining experience. This, in turn, will set a high standard to which all patrons are expected to adhere to.

The Hotel's diverse offering in conjunction with the absence of designated dance floor/nightclub facilities is expected to diminish the opportunity for alcohol-related violence on-site significantly. The classification of the premises as a licensed pub does not have any bearing on the prevalence of alcohol-related violence or incidents that may occur on-site.

<sup>21</sup> Briscoe and Donnelly "Problematic Licensed Premises for Assault in Inner Sydney, Newcastle and Wollongong" [The Australia and New Zealand Journal of Criminology 2003].

## Relevant Research

Research has historically focused on the type of premises and its hours of operation to demonstrate that there is a propensity for higher impact for hotels and later trading hours. For example, the majority of assaults in licensed premises in the inner-city area of Sydney, Newcastle and Wollongong, occurred at hotels with trading hours extending after midnight.<sup>22</sup> That may give some indication, but in our view, it offers an incomplete picture.

Other research, undertaken in the 1990's, indicates that assaults were more likely to occur at hotels or nightclubs with predominately male clienteles where the main entertainment was music with dancing, leading to competition for females, and where inebriated customers continued to be served alcohol.<sup>23</sup> It is not considered that it was the fact that those premises were hotels or nightclubs that were the driving factor behind the higher level of violence rather it was the character of the premises and its serving practices.<sup>24</sup>

This is recognised and reflected in further studies such as "Alcohol and Licensed Premises: Best Practice in Policing" [National Drug Law Enforcement Research Fund, 2003] and Nicholas "Identifying and Responding to Problematic Licensed Premises – a Guide for Police" [Australasian Centre for Policing Research, 2006]. Those documents provide a range of factors in the design and operation of licensed premises that contribute to the potential for harm. This is further supported by more recent research into the effect of licensed premises density and violence.<sup>25</sup>

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## Hours of Operation

The Hotel's proposed hours of operations are:

- Monday to Saturday – 10am to 4am (the next day).
- Sunday – 10am to 12 midnight.

The proposed hours of operation are considered appropriate for the size of the development and surrounding environment. The Subject Site is located along the busy Parramatta Road with close proximity to the Strathfield and Flemington Train Station.

The Application adequately meets the communities' expectations through the provision of diverse late-night facilities. The extension of trading hours will provide refuge for patrons during late-night hours between trains or late night buses. In this respect, it is anticipated that the late-night operation of the Hotel will not give rise to adverse social impacts in the community.

## Capacity

The Hotel's approved capacity is 350 patrons until 10pm, and 280 patrons following 10pm.

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<sup>22</sup> Briscoe and Donnelly "Temporal and Regional Aspects of Alcohol-related Violence and Disorder" *Alcohol Studies Bulletin*, No 1 [NSW Bureau of Crime Statistics and Research, 2001].

<sup>23</sup> *Drinking Settings and Problems of Intoxication* [Vol 3 Addiction Research and Theory 1995].

<sup>24</sup> *High Risk Drinking Setting: The Association of Serving and Promotional Practices with Harmful Drinking* [Vol 88 Addiction 1993].

<sup>25</sup> Liang and Chikritzhs "Revealing the link between licensed outlets and violence: Counting venues versus measuring alcohol availability" [Vol 30 Drug and Alcohol Review 2011].

### 6.1.2 Ambience and Design

Research has identified that physical and regulatory features of licensed premises and their environs can impact on individual and group behaviour and increase the probability of alcohol-related harm. For example, when investigated whether or not it was the clientele of violent bars (in New York) which had a propensity for violence or whether or not it was the physical characteristics of the bars themselves – rather than the characteristics of their patrons – that led to violence occurring, researchers found that, overall, the characteristics of the premises – rather than the characteristics of their patrons – better predicted the likelihood of violence.<sup>26</sup> The two most prominent characteristics of bars with the highest levels of violence were high noise levels and high ambient temperatures.

The effects of the design and operation of hotels on patron behaviour were explored in detail in Doherty and Roche "Alcohol and Licensed Premises: Best Practice in Policing"<sup>27</sup> and other environmental factors in Nicholas "Identifying and Responding to Problematic Licensed Premises – a Guide for Police"<sup>28</sup>. Each advanced a range of environmental factors which should be considered in the design and on-going operation of licensed premises which can be manipulated in order to elicit non-aggressive responses, rather than aggressive responses, from patrons. The factors included in this assessment are as follows.

- Capacity, crowding and queues;
- Entertainment and noise levels;
- Heating/ventilation;
- Lighting; and,
- Social cues such as cleanliness, odour and fit-out quality.

#### Capacity, Crowding and Queuing

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#### Relevant Research

Overcrowding increases the chance of accidental contact as well as increasing temperature and noise levels. Alcohol affects the ability of individuals to appropriately deal with accidental contact. Patrons may also drink more to overcome the discomfort of heat and noise which further lowers tolerance. Overcrowding may also encourage anti-social behaviour through perceived anonymity and lowered perceptions about being apprehended. By adopting an appropriate limit on patron numbers, overcrowding will be avoided at the Hotel.

The adverse impacts of overcrowding are most evident around facilities such as bars, toilets, dance floors and thoroughfares. The Hotel will have adequately sized bars. Its toilets are out of

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<sup>26</sup> Quigley et al "Characteristics of Violent Bars and Violent Patrons [Journal of Studies on Alcohol 2003].

<sup>27</sup> Doherty S, Roche A "Alcohol and Licensed Premises: Best Practice in Policing" [National Drug Law Enforcement Research Fund, 2003]

<sup>28</sup> Nicholas R, "Identifying and Responding to Problematic Licensed Premises – a Guide for Police" [Australasian Centre for Policing Research, 2006].

*any circulation thoroughfares and it has ample room and facilities for the proposed number of patrons having regard to the relevant considerations under Part D1 and F2 of the Building Code of Australia (BCA).*

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Capacity and queuing at the Hotel are to be managed according to the Hotel's Plan of Management and enforced by Hotel security/management at all times. One security guard will be stationed at the Hotel during the proposed extended trading hours to monitor patron behaviour and ensure that the amenity of the surrounding land uses is not adversely impacted by the Hotel.

The facilities offered within the Hotel include adequately sized bars and service areas that mitigate the potential for overcrowding. There is ample room and facilities for the Hotel's patron capacity having regard to the relevant considerations under Part D1 and F2 of the Building Code of Australia. These measures, in conjunction with the provisions of the Hotel's Plan of Management and recommendations within this SIA, are sufficient in mitigating the adverse impacts of overcrowding within the Hotel.

#### Entertainment

No entertainment will be provided at the Hotel during the extended trading hours. In the absence of live entertainment, background music will likely be played in all publicly accessible areas of the Hotel. Entertainment is to be managed per the Plan of Management for the site.

#### Heating/Ventilation

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#### *Relevant Research*

*Poor ventilation and inefficient air-conditioning can contribute to the temperature of venues. Heat exacerbates physical discomfort which, in turn, heightens irritation and leads to increased alcohol consumption. The consequence is increased risk of intoxication, aggression and violence.*

The climate of all internal habitable areas will be regulated through a central heating and cooling system to preserve the amenity and comfort of patrons across the various venues on-site. Regulation of the climate system will be the responsibility of the duty manager.

The Hotel will be equipped with a heating and cooling system to prevent issues arising from poor ventilation.

#### Lighting

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#### *Relevant Research*

*Appropriate levels of lighting can reduce crime and disorder by facilitating surveillance and decreasing perceptions of anonymity. Too much light can irritate patrons while too little light hinders observation of patron behaviour and may contribute to crime and disorder associated with perceived anonymity.*

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All internal and external areas of the development should be sufficiently lit throughout the day to deter anti-social behaviour. The lighting within the Hotel will overflow onto the surrounding public domain to uphold the amenity of the surrounding environment. Lighting levels within the public areas of the development should be adjustable and will be sufficient to permit patrons to eat meals throughout the hours of operation.

### Social Cues

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#### *Relevant Research*

Other ambient considerations include comfort and cleanliness.<sup>29</sup> Physical comfort has a significant civilising effect on licensed premises. Particularly important factors include general ambience, the spacing, comfort and style of furniture and the cleanliness of toilet facilities. These all provide important cues to patrons concerning acceptable standards of behaviour.

A well-designed premises also facilitates the observation of patrons and assists in the responsible service of alcohol. For example, having ample service bars will eliminate any lengthy delays and any resultant potential frustration. Ample bars also assist with the responsible service of alcohol by reducing pressure on staff to serve as many patrons as quickly as possible thus allowing them time to judge if any patron is approaching intoxication.

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The quality of the Hotel's design and fit-out will ensure the proposed licensed facilities stand out from other premises in Homebush, raising the standard of hospitality offerings and adding to the diversity of the local area. These physical cues will prompt patrons of the higher standard of behaviour expected.

**Findings:** It can be concluded that the design and general operation of the various licensed facilities within the development is such that it can be expected to assist in eliminating irritant factors and thus be more likely to elicit non-aggressive responses from its patrons. Thus, contributing to a low potential for adverse social impact.

## 6.2 Crime Prevention Through Environmental Design (CPTED) Principles

The NSW Police Force website provides an overview of Crime Prevention Through Environmental Design (CPTED).<sup>30</sup> CPTED is a crime prevention strategy that focuses on the planning, design and structure of cities and neighbourhoods. It reduces opportunities for crime by using design and place management principles that reduce the likelihood of essential crime ingredients (law, offender, victim or target, opportunity) from intersecting in time and space.

Predatory offenders often make cost-benefit assessment of potential victims and locations before committing crime. CPTED aims to create the reality (or perception) that the costs of committing crime are greater than the likely benefits. This is achieved by creating environmental and social conditions that:

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<sup>29</sup> Homel et al "Making Licensed Venues Safer for Patrons: What Environmental Factors Should be the Focus of Interventions? [Vol 23 Drug and Alcohol Review 2004.

<sup>30</sup>[https://www.police.nsw.gov.au/safety\\_and\\_prevention/policing\\_in\\_the\\_community/safer\\_by\\_design](https://www.police.nsw.gov.au/safety_and_prevention/policing_in_the_community/safer_by_design), accessed 27 April 2021

- Maximise risk to offenders (increasing the likelihood of detection, challenge and apprehension);
- Maximise the effort required to commit crime (increasing the time, energy and resources required to commit crime);
- Minimise the actual and perceived benefits of crime (removing, minimising or concealing crime attractors and rewards); and
- Minimise excuse making opportunities (removing conditions that encourage/facilitate rationalisation of inappropriate behaviour).

CPTED employs four key strategies. These are territorial re-enforcement, surveillance, access control and space/activity management. All CPTED strategies aim to create the perception or reality of capable guardianship. These strategies are explored below, with reference to the NSW Police Force website, in the context of the proposed development.

## 6.2.1 Territorial Reinforcement

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### Relevant Research

*Territorial re-enforcement uses actual and symbolic boundary markers, spatial legibility and environmental cues to 'connect' people with space, to encourage communal responsibility for public areas and facilities, and to communicate to people where they should/not be and what activities are appropriate.*

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Entry to the site will be clearly delineated through the various access points on Parramatta Road. In addition to the above, the boundary of the site is also clearly marked by the built form. Back-of-house areas for staff within the Hotel would be clearly marked and would be locked.

## 6.2.2 Surveillance

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### Relevant Research

*People feel safe in public areas when they can see and interact with others, particularly people connected with that space, such as shopkeepers or adjoining residents. Criminals are often deterred from committing crime in places that are well supervised.*

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Technical/Mechanical Surveillance is achieved through mechanical/electronic measures such as CCTV, help points and mirrored building panels. CCTV will be installed at various internal and external locations within the site boundary of the Hotel. Live footage will be monitored by the operator or a duty manager during business hours. Signs will be displayed to notify patrons that upon entering the Hotel, their behaviour will be recorded. By maintaining a clear path of view, passing traffic on Parramatta Road can also maintain passive surveillance on the Hotel and its patrons.

Natural surveillance is achieved when normal space users can see and be seen by others. Internally, the venue will be fragmented into smaller, more manageable areas so as to be more readily supervised by staff and reduce the feeling of anonymity through passive surveillance between patrons. Externally, passive surveillance will be provided by patrons inside the Hotel and passing public.

Formal (or Organised) Surveillance is achieved through the tactical positioning of guardians. Security Personnel will be provided in accordance with the Plan of Management during more sensitive hours to reduce the potential for adverse impacts to surrounding sensitive land uses. At least one security officer will be at the Hotel during the proposed extended hours.

### 6.2.3 Access Control

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#### Relevant Research

*Access control treatments restrict, channel and encourage people and vehicles into, out of and around the development. Wayfinding, desire-lines and formal/informal routes are important crime prevention considerations. Effective access control can be achieved by using physical and symbolic barriers that channel and group pedestrians into areas, therefore increasing the time and effort required for criminals to commit crime.*

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All staff areas are shown to be secure on the proposed plans through doors, which would be locked and marked as entry for staff only. This meets the requirement for access control.

### 6.2.4 Space/Activity Management

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#### Relevant Research

*Space/Activity Management strategies are an important way to develop and maintain natural community control. Space management involves the formal supervision, control and care of the development. All space, even well planned and well-designed areas need to be effectively used and maintained to maximise community safety. Places that are infrequently used are commonly abused. There is a high correlation between urban decay, fear of crime and avoidance behaviour.*

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It is considered that the above is adequately addressed through the provisions of the proposed Plan of Management.

**Findings:** The Hotel's design aspects are considered to sufficiently integrate relevant CPTED principles through territorial reinforcement, surveillance, access control and space/activity management. The Application is considered to maximise passive and casual surveillance where possible to facilitate an enhanced sense of safety and security for public domain users on Parramatta Road. Territorial reinforcement is provided through clear delineation of the multiple uses of the development, and the regressive design of various entry points on both frontages. Sufficient external lighting from the Hotel and existing lighting on public roads will illuminate the surrounding environment and deter criminal and anti-social behavior.

## 6.3 Harm Minimisation Strategies

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### Relevant Research

Research has shown that it is not the type of licence per se that is the key predictor of levels of alcohol related harm, but the volume of alcohol consumed on the premises and the extent to which obviously intoxicated customers continue to be served alcohol.

Research has also shown that staff and security officers can also contribute to the level violence at a hotel. For example, in a Canadian report (Wells et al "Responses by Security Staff to Aggressive Incidents in Public Drinking" [Journal of Drug Issues, October 1998]), 182 violent incidents at licensed premises were studied, of which 106 involved security officers. The responses of the security officers to incidents were graded as "good", "neutral", "bad" or "ugly", with "bad" meaning guards enhanced the likelihood of violence and "ugly" meaning that they were directly aggressive or provocative. Almost half of all the incidents were labelled either "bad" or "ugly". There is anecdotal evidence that security guards can play a similar aggressive role in NSW.

The above research suggests that the strict enforcement of RSA and the prevention of intoxication, through good staff and training, are key factors in reducing the potential for social impact and complement design factors of licensed premises.

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The Hotel's size will require the presence of security guards through peak hours of operation. All staff involved with the sale and supply of liquor or security will be required to be trained in the responsible service of alcohol and to abide by its requirements not only because of the legislation but also to protect the ambience and reputation of the hotel. This will require the Hotel to enforce appropriate patron behaviour, i.e., doing all they reasonably can do to prevent patrons from becoming intoxicated or behaving in a manner that could be described as indecent, violent or quarrelsome.

The Hotel should recognise the importance of encouraging the responsible consumption of alcohol and the need to enforce the above expected norms of behaviour. This will be enforced through the implementation of the Hotel's Plan of Management.

**Findings:** Provided that the appropriate harm minimisation strategies within the Plan of Management are implemented, the Hotel's operations are unlikely to give rise to adverse social impacts on the locality. These strategies should be appropriately supported through Responsible Service of Alcohol measures, and adequate staff training.

The incorporation of relevant CPTED principles and harm minimisation strategies will significantly diminish the potential for social impact arising from the Application, as well as bolster the community's resilience to social impact.

## 7. Result Interpretation

The Inventory Analysis carried out in Section 4 revealed both positive and negative characteristics and indicia of the Local and Broader Communities in the context of susceptibility to alcohol related social impacts. These characteristics are summarised as follows.

**Table 11** - Susceptibility of Alcohol-Related Social Impacts in the Local and Broader Community

Indicia	Positive characteristics	Negative characteristics
Demographics	Low population of Aboriginal and Torres Strait Islanders (ATSI).	Higher percentage of at-risk young adults (20-24) in the Local and Broader Community.
Education	Highly educated population with high levels of tertiary qualifications comparative to that of the NSW average. A highly educated population is less likely to suffer from <b>acute</b> and <b>chronic</b> alcohol-related harm.	N/A
Employment	Higher proportion of full-time workers than the NSW average in both Local and Broader Community.	Slightly higher proportion of unemployed population within the Local and Broader Communities.
Income	High proportion of the population working in white-collar jobs such as professionals and administrative workers. White-collar workers are less likely to suffer from <b>acute</b> alcohol-related harm than blue-collar workers.	N/A.
Community Diversity	Personal, family and household incomes are higher than the NSW average, indicating a lower susceptibility to <b>chronic</b> alcohol-related harm.	N/A
SEIFA (IRSAD) Data	N/A	The Local and Broader Community is classified as 'most advantaged' which indicates a higher propensity to <b>chronic</b> alcohol-related harm. Although communities in upper percentiles are more likely to drink on occasion, they often have fewer drinks per session therefore less likely to practice harmful consumption of alcohol.

**Table 11** - Susceptibility of Alcohol-Related Social Impacts in the Local and Broader Community

Indicia	Positive characteristics	Negative characteristics
BOCSAR Data	Rates of offences in the Local and Broader Communities are consistently significantly lower than the NSW average, indicating a low risk of acute alcohol-related harm.	The Subject Site is located within existing hotspots for all offences. The hotspot data indicates a high susceptibility to acute alcohol-related harm. However, it must be considered that the prevalence of hotspots is attributed to the characteristics of the area with concentration of commercial and retail developments and being a highly accessible location along Parramatta Road.
HealthStats NSW	Lower rates of alcohol-attributable deaths and hospitalisations, indicating a lower potential for chronic and acute alcohol-related harm.	N/A
Liquor & Gaming Live Data	No change to outlet saturation and clustering rates for Hotels in the Local and Broader Community.  Outlet clustering is significantly lower than NSW within the Broader Community.	Higher levels of outlet saturation of liquor licences in the Local Community.

The positive characteristics identified above considerably outweigh the perceived negative characteristics present in the Local and Broader Community. The operational details identified in the Impact Assessment are considered to capitalise on these positive characteristics and enhance the community's resilience to alcohol-related harm, ensuring that the Application does not give rise to adverse social impact on the surrounding area.

The following table assesses the Application against the criteria established in the Goal and Scope Phase of this SIA in the context of the findings of Sections 4 and 5.

**Table 12 - Assessment**

Criteria	Policies referred	Summary of Criteria	Assessment
Planning Criteria	<i>Environmental Planning &amp; Assessment Act 1979</i> <i>Strathfield Local Environmental Plan 2012</i>	<p>Protect and promote the use and development of land for arts and cultural activity, including music and other performance arts;</p> <p>To maintain and enhance the existing amenity of the local community and to reduce adverse impacts from development on adjoining or nearby residential properties.</p> <p>Aims to provide for future employment, achieve a sustainable balance between commercial, retail, residential, education, cultural and other uses to ensure on-going vibrancy.</p>	<p>The Application will result in a positive economic and social impacts on the local and broader community.</p> <p>An increased provision of local employment opportunity within the local community can be anticipated as a result of the Application.</p> <p>The Plan of Management for the proposed Hotel will ensure the proper management of the Hotel.</p> <p>The Application is in public interest as it is compatible with Council's desired future character for the suburb. The Hotel will provide services in Homebush when other premises are typically closed. These services include late night entertainment, food and beverages.</p>
Licor Criteria	<i>Liquor Act 2007</i>	<p>Ensure appropriate management of licensed premises.</p> <p>Minimise harm and impact associated with alcohol use and licensed premises.</p> <p>Encourage responsible consumption of alcohol practices.</p> <p>Ensure licensed premises do not give rise to adverse social impact on communities.</p>	<p>The positive social impacts of the Application are anticipated to counteract the potential negative social impacts commonly associated with the operation of hotels. In addition, several pertinent characteristics and indicia of the community, such as higher education levels, higher levels of full-time and white-collar workers, and higher income and lower levels of ATSI population, indicate a lower propensity to alcohol-related harm in the community. Therefore, it is concluded that the Application would not be detrimental to the well-being of the local or broader community.</p> <p>Provided that the Application's Plan of Management, which incorporates appropriate RSA and security provisions, is implemented, the Application is capable of meeting the assessment criteria.</p>

## 7.1 Scoping the Social Impact of the Application

Reference is made to the definition of *social impact* as identified in Section 2 of this SIA.

*“Social impact... refers to the ... social consequences of a proposed decision or action, namely the impacts on affected groups of people and on their way of life, life chances, health, culture and capacity to sustain these.”*

Upon consideration of the various community characteristics and undertaking a detailed analysis of the Application against the relevant social impact criteria, it is considered that the Application would not give rise to social impact as defined above. The existing susceptibility of the Local and Broader Community to alcohol-related harm is considered low based on a variety of indicia such as employment, education, crime and health data etc. These indicia directly feed into the life chances, health, culture and capacity of the community to sustain possible social impacts. The positive characteristics of the community bolster the community's resilience to alcohol-related harm, thus significantly diminishing the potential for the operation of the Hotel to give rise to adverse social impacts on the surrounding community. In addition, appropriate mitigation such as limiting the patron capacity and provision of security guards during peak trading hours would further re-enforce the resilience of the community to social impact and alcohol-related harm.

Based on the fore going, the likelihood of the Application giving rise to social impacts (as defined by the Planning Institute of Australia) is low.

## 7.2 Recommendations

This SIA recommends the inclusion of the following management measures in the Hotel's Plan of Management.

- A clause restricting the Hotel's maximum patron capacity after 10pm to 280 persons per Condition 130 of DA2019/057.
- A clause requiring the duty manager to arrange (without charge) a taxi service for those patrons who request it.

These provisions are included in the updated Plan of Management (**Annexure 1**)

## 8. Conclusion

This Social Impact Assessment has been prepared to accompany a development application to Strathfield Council. The Application seeks to extend the Hotel's trading hours so that it can operate between 10am and 4am (the next day), Monday to Saturday.

The Inventory Analysis identified a range of positive and negative characteristics of the community that are indicative of the community's overall susceptibility to alcohol-related harm. Characteristics analysed included demographic indicia, income, employment, education, SEIFA data and crime data. Whilst both positive and negative characteristics were identified, the positive characteristics were found to outweigh the negative characteristics, indicating a lower susceptibility to alcohol-related harm.

In addition, the Impact Assessment found that the Hotel's attributes, including integration of CPTED design principles and incorporation of appropriate harm minimisation measures into the Plan of Management, will bolster the community's resilience to alcohol-related harm and adverse social impact overall.

An assessment of the Application against the identified criteria and set definition of the term '*social impact*' concluded that the likelihood of the Application giving rise to social impacts is low.

Under these circumstances, the Application is considered to be acceptable concerning all relevant social planning issues.

Therefore, it is concluded that there are no valid social planning reasons why development consent should not be granted to the Application as proposed.