

13 July 2016

Dear Liquor and Gaming NSW,

Thank you for the opportunity to comment on the 2016 review of the small bars legislation.

A key priority for Northern Sydney Local Health District (NSLHD) Health Promotion is to prevent alcohol-related harm such as interpersonal violence, accidental injury, malicious damage and long-term health impacts.

Northern Sydney LHD Health Promotion would like Liquor and Gaming to consider the following matters in relation to this review:

1. The community is substantially deprived of opportunities to oppose small bars at the DA and licence approval stages. Small bars are exempt from the Community Impact Statement (CIS) process. However, the concern is that there is potential for even small bars to have an impact on the community and thus consultation is paramount.  
*Recommendation: Introduce CIS process for small bar applications*
2. Small bars are a good **substitute** for large late night trading venues. However, there appears to be no consideration of cumulative impact of a concentration of small bars in a confined area. A street or precinct full of small bars may impact on the community in a similar way as would a large bar.  
*Recommendation: Introduce CIS process as this would provide an opportunity for the community to consider the density of small bars and thus the potential for alcohol-related harm.*
3. Automatic 2am trading is problematic and disruptive to the local community.  
*Recommendation: Consideration should be given to earlier closing times in the DA conditions, particularly where the bar is proposed in an area synonymous with alcohol related harms.*
4. Patron numbers should be limited to 60 people or less. Smaller numbers of patrons is more easily managed by hotel staff and therefore intoxication levels can be more closely monitored.
5. Currently, small bar applications are submitted to Liquor and Gaming NSW. This poses potential concerns particularly in known high risk drinking precincts.  
*Recommendation: Small bar applications in high risk drinking precincts should automatically go directly to ILGA for approval.*

If you have any questions, please don't hesitate to contact me on 9976 9579 or [Melissa.Palermo@health.nsw.gov.au](mailto:Melissa.Palermo@health.nsw.gov.au)

Sincerely,



Melissa Palermo  
Manager, Northern Beaches Health Promotion

Northern Sydney Local Health District  
ABN 63 834 171 987

**Northern Beaches Health Promotion**  
Manly Hospital PO Box 465 Manly NSW 1655  
Tel 02 9976 9531 Fax 02 9977 7531  
[www.nshealthpromotion.com.au](http://www.nshealthpromotion.com.au)