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27 July 2018

The General Manager
City of Parramatta
PO Box 32
Parramatta NSW 2124

Attention: Jonathan Cleary

Dear Jonathan,

RESPONSE TO SOCIAL IMPACTS - PARRAMATTA RSL CLUB (MODIFICATION TO DA/805/2013/C)

This letter has been prepared by Urbis on behalf of Castle Hill RSL Club ('the Club') who are the owners and operators of the Parramatta RSL Club. It provides a response to the social impacts identified by Parramatta Council (Council) in a letter issued on the 25th June 2018 and supplementary information received on 17th July, in relation to a Section 4.55 modification to DA/805/2013.

The applicant no longer seeks modification to Condition 109 to increase the number of electronic gaming machines and therefore the associated impacts have not been addressed in this response.

The application still seeks to amend condition 118 to extend the approved operating hours to 7am-4am (7 days), noting all outside areas (i.e. roof and side terraces) not to be used by patrons from 1am-7am (7 days).

1.1. BACKGROUND TO THE PROPOSED MODIFICATION

In June 2015 development consent was granted by Council for a major redevelopment to the existing Parramatta RSL Club, to deliver a contemporary, family friendly venue that provides a range of facilities for different segments of the Parramatta community.

Further background of this matter, together with information about the Club has been provided in the original Section 4.55 application (submitted to Council in April 2018). This information included a Social Impact Assessment (SIA) prepared by Urbis.

Following our recent meeting with Council Officers on 10 July, Urbis has provided additional information to Council in its Addendum Statement of Environmental Effects (dated 25 July 2018) as well as an addendum Acoustic report (dated 17 July 2018). This letter represents an addendum to our SIA and specifically responds to the matters raised at our meeting.

1.2. SOCIAL IMPACTS IDENTIFIED BY COUNCIL

In relation to the modification of Condition 118, the following social impacts were identified by Council:

“It is likely that due to the extended hours of operation and increased patronage to the site, that disorderly behaviour and rates of alcohol related incidents in and around the site will increase.”

1.3. RESPONSE TO SOCIAL IMPACTS

The following section responds to the issue of alcohol related crime and outlines the social context of Parramatta RSL Club that supports extended operating hours:

1.3.1. Parramatta RSL Club management measures

Parramatta RSL Club recognises its social license to operate, which includes maintaining a safe environment for club members, visitors and the broader community. Parramatta RSL Club operates under a comprehensive Plan of Management that outlines safety and security measures to mitigate disorderly behaviour and alcohol related incidents, including:

- Proof of age is to be provided upon request to prevent underage drinking.
- Persons who are believed to be intoxicated will be refused admission to the premises.
- Displaying Intoxication Signs in order to support a responsible attitude and meet legislative requirements.
- Refusal to sell or supply liquor to any intoxicated persons. Patrons in the establishment will be denied service and required to leave the premises if they are considered to be intoxicated.
- No tolerance for any indecent, violent or quarrelsome conduct on the premises.
- All staff are required to have current RSA competency cards prior to employment with the Castle Hill RSL Group and are required to actively identify and notify their Supervisor or Duty Manager of any person they suspect as approaching intoxication.
- Supporting and actively promote initiatives to minimise drink driving in order to safeguard the well-being of our members, including a courtesy bus is available to members of the Club to provide safe and convenient transport.

The Club currently employs a range of mitigation measures to prevent and protect against possible negative impacts. These measures will continue to be employed as part of the Club’s ongoing operation, including the extended operating hours. They include:

- Installation of CCTVs across the facility covering all areas.
- Installation of appropriate signage within the facility to respect the amenity of adjoining areas.
- Employment of appropriately trained staff, including security staff, to greet and admit patrons to the Club as well as patrolling external areas to the building to proactively address the potential for any disturbance.



- The current modification proposal involves all outdoor areas (i.e. roof and side terraces) not to be used by patrons from 1am – 7am (7 days).
- The restriction of use of the internal areas of the Club by patrons to effectively half of the ground floor level during the late-night period. Specifically, this involves this restriction occurring between the following hours:
 - Friday and Saturday: From 1am (until closing)
 - All other days: From 12 midnight (until closing)
- This restricted area includes the lounge and sports bar and gaming areas as shown on the attached Operation Plan at Appendix 6 of the Addendum Statement of Environmental Effects. During this time, the Club will operate a late-night food service, reduced beverage service and sports and gaming lounge facilities. This Plan forms part of the Club’s Management Plan.

The above measures are incorporated within the Club’s Management Plan which is currently in place and has been submitted in support of the current Section 4.55 application.

1.3.2. Proven track record

Parramatta RSL Club provided Urbis with an extract from its incident log between September 2017 and July 2018, summarise in Table 1. In this time only 6 minor incidents have been reported and no letters of complaint have been received from either Council, Police, the Independent Liquor and Gaming Authority, nor residents or businesses within the surrounding area. The Parramatta RSL Club liquor licenses has never been suspended or cancelled, nor called into question during Castle Hill RSL Club’s operation of Parramatta RSL.

Table 1 – Parramatta RSL incident register

Date	Time	Area	Type of incident
20 th September 2017	8pm	Front door	Two persons refused entry
19 th December 2018	7.10pm	Bingo area	Person fail to quit and argumentative
22 nd December 2018	8.25pm	TAB area	Two persons argumentative
9 th February 2018	7.15pm	Front door	Person fail to quit and signs of intoxication
17 th February 2018	8.35pm	NA	Person fail to quit and signs of intoxication
17 th March 2018	7.30pm	NA	Person argumentative

The Club is vigilant about recording and effectively managing each and every incident (no matter how minor) as the Club operates on a ‘zero tolerance policy’. Other venues may not log the examples identified in Table 1 above as ‘incidents’, and so this evidence provides a very comprehensive record of management.

1.3.3. Benefits of expanded operating hours

The expanded operating hours seek to increase Parramatta RSL Club's capacity to operate in the early morning as well as late evening. The current approved operating hours (10am – 1am) restrict the club from delivering a range of services that support social and economic benefits to the Parramatta CBD. Key activities and events that the expanded operating hours facilitate include:

- Breakfast conferences and other business events
- ANZAC day dawn service, mother's day and father's day breakfast and other special events
- Live screening of major sporting events
- Late night dining, entertainment and gaming providing an alternate option to the pubs within the area providing opportunities to residents and workers within the area, including those who may operate on late-night shifts.

We note that whilst the proposal seeks to provide extended operating hours, it is still required (and will) observe the mandatory shut down period of the gaming machines enforced by its licence from 4am until 10am.

1.3.4. Disorderly behaviour and alcohol related crime

As highlighted by Council, Parramatta suburb has elevated rates of crime above the NSW average.

The Parramatta CBD is a major economic and activity centre with a developed night time economy and elevated levels of crime can be reasonably expected, when compared to the NSW average.

Analysis of crime rate data for other activity centres at the LGA and suburb level, as shown in **Error! Reference source not found.**, indicates that Parramatta has similar or lower rates of crimes. Key findings include:

- Parramatta LGA has lower rates of 'liquor offenses', 'alcohol related assault' and 'disorderly conduct' compared to Sydney LGA, Penrith LGA and the NSW average.
- Parramatta suburb has lower rates of 'liquor offenses' and 'alcohol related assault' compared to Sydney suburb.
- Parramatta suburb has lower rates of 'disorderly conduct' and 'alcohol related assault' compared to Penrith suburb.
- Analysis of two-year trends show Parramatta LGA and suburb have stable rates of crime.

Table 2 – Parramatta - April 2017 to March 2018

Parramatta LGA			Parramatta suburb			NSW
Offense type	2-year trend	Rate per 100,000 people	Offense type	2-year trend	Rate per 100,000 people	Rate per 100,000 people
Liquor offense	Stable	124.3	Liquor offense	Stable	300.1	142.8
Alcohol related assaults	Stable	151.9	Alcohol related assaults	Stable	455.7	260.3
Disorderly conduct	Stable	175.8	Disorderly conduct	Stable	581.7	262.9

Table 3 – Sydney - April 2017 to March 2018

Sydney LGA			Sydney suburb			NSW
Offense type	2-year trend	Rate per 100,000 people	Offense type	2-year trend	Rate per 100,000 people	Rate per 100,000 people
Liquor offense	Stable	1222.5	Liquor offense	Down 29%	4018.4	142.8
Alcohol related assaults	Stable	946.0	Alcohol related assaults	Stable	3371.7	260.3
Disorderly conduct	Stable	900.9	Disorderly conduct	Stable	477	262.9

Table 4 – Liverpool - April 2017 to March 2018

Liverpool LGA			Liverpool suburb			NSW
Offense type	2-year trend	Rate per 100,000 people	Offense type	2-year trend	Rate per 100,000 people	Rate
Liquor offense	Stable	52.3	Liquor offense	Stable	213.4	142.8
Alcohol related assault	Stable	139.9	Alcohol related assault	Stable	342.8	260.3
Disorderly conduct	Stable	168.2	Disorderly conduct	Stable	521.2	262.9

Table 5 – Penrith April 2017 to March 2018

Penrith LGA			Penrith suburb			NSW
Offense type	2-year trend	Rate per 100,000 people	Offense type	2-year trend	Rate per 100,000 people	Rate
Liquor offense	Stable	36.7	Liquor offense	Stable	256.8	142.8
Alcohol related assault	Stable	273.1	Alcohol related assault	Stable	1012.5	260.3
Disorderly conduct	Stable	216.5	Disorderly conduct	Stable	961.1	262.9

1.3.5. Access to alcohol and crime

The relationship between alcohol and crime and antisocial behaviour is complex and there are number of risk factors identified in academic literature, including characteristics of patrons, the venue, social

environment, staff behaviour and the wider environment¹, which contribute to alcohol related crime and violence and in any given area.

Council refers to the BOCSAR research bulletin - *Temporal and Regional Aspects of Alcohol-Related Violence and Disorder, 2001* which finds that the percentage of alcohol-flagged assault incidents increase substantially between the hours of 6.00pm and 3.00am, peaking between midnight and 3.00am.

The research also finds that these times closely correspond to closing times and where most hotels and clubs close at similar times this can result in intoxicated patrons from different licensed premises congregating the same area which could lead to an increase in the propensity for violence. To reduce the likelihood of conflict and thus reduce the number of violent incidents, the research suggests staggering closing times of clubs and hotels, ensuring better transport is available to move intoxicated patrons out of these areas more efficiently or police monitoring of bottlenecks where several licensed premises are situated.

Parramatta RSL Club is located in close proximity to public transport, provides a courtesy bus for its members and operates under a strict Plan of Management to manage intoxication and anti-social behaviour. As noted by Council, there are no other premises on Macquarie Street open until 4am and congregation is likely to be avoided.

The entrance to the Club is on the Macquarie Street and O’Connell Street corner and hence the access routes to the Club’s entrance is highly visible. Similarly access to neighbour taxi ranks and the Parramatta Train Station are via direct, well-lit and obvious pathways. Although unconstructed yet, the Parramatta light rail will provide a further means of transport, including direct and well-lit access to the Macquarie Street stop.

1.3.6. Contribution to the night time economy

Parramatta Council has identified seven key themes to improve Parramatta’s night time economy. Parramatta RSL Club offers a wide range of services that help deliver of these aspirations including:

Table 6 – Parramatta Council night time economy key themes

Theme	Parramatta RSL response
Safe and vibrant centres	Comprehensive Plan of Management (including mitigation measures); a good track record as shown in the Club incident report register; a safe and surveyed location, and located on a with well connected, well lit footpath system to surrounding attractions and transport options.
A competitive night time economy	Providing convenient and alternate late-night choices (to pubs) for the growing number of existing residents and workers within the Parramatta CBD, as well as attracting people from beyond the area (given its high accessibility).

¹ Smith L, Morgan A & McAtamney A. 2011, Technical and background paper series No. 48, The consumption of alcohol, violence and licensed premises, Canberra: Australian Institute of Criminology. <https://aic.gov.au/publications/tbp/tbp048>

Theme	Parramatta RSL response
Live entertainment and recreation	Live music and box office events, café and children's play area.
Creative spaces	Multi-purpose function centre for hire.
Celebrating our diversity	Community support programs extended to a range of community groups, charities and community activities (refer to the number and breadth of local organisations the Club supports, included in Appendix 3 to the Addendum Statement of Environment Effects (25 July 2018)).
Events and activations	Calendar of events and entertainment options for those organisations referred to in Appendix 3 to the Addendum Statement of Environment Effects (25 July 2018).
Easy to get to, easy to get home	Courtesy bus services provided to provide safe transport for members. Parramatta train station and various bus stops and taxi ranks are located within approx. 500m walk, providing services to the local area and a variety of train lines to Metropolitan Sydney. The Parramatta light rail will have a stop approx. 350m to the east on Macquarie Street.

1.4. CONCLUSION

The following is a summary of social context of Parramatta RSL Club that supports extended operating hours:

- Parramatta RSL Club recognises its social license to operate under a comprehensive plan of management to provide a safe and enjoyable environment for member, visitors and broader community.
- Parramatta RSL Club has a proven track record, with no major incidents, complaints or license breaches recorded. This track record provides a strong operational foundation to support extended operating hours.
- Parramatta LGA is major economic and activity centre and elevated levels of crime can be reasonably expected, when compared to the NSW average. However, when compared to the Sydney LGA and suburb, Parramatta generally has lower rates of relevant crimes.
- The expanded operating hours will facilitate the delivery of a range of services to that are expected within a contemporary club and that offer social and economic benefits to the Parramatta CBD and broader community.

- Parramatta RSL Club offers a wide range of services that help deliver on the seven key themes identified in the Parramatta Night Time Economy Discussion Paper.
- The relationship between alcohol and crime and antisocial behaviour is complex and there are number of risk factors including characteristics of patrons, the venue, social environment, staff behaviour and the wider environment that need to be considered. Extended trading hours is one potential factor that can be managed through effective management of closing times, public transport and management measures to avoid congregation of intoxicated people.
- There is no direct evidence to suggest that an increase in the operating hours of Parramatta RSL Club will result in an increase in disorderly behaviour and rates of alcohol related incidents in and around the site.

Thank you for the opportunity to respond. Should you wish to discuss this response, please do not hesitate to contact Lucy Band on (02) 8233 9961.

Yours sincerely,

A handwritten signature in black ink that reads "Lucy Band".

Lucy Band
Associate Director