

SUMMARY OF APPLICATION

The Applicant has prepared the following summary to clarify any residual concerns that the Authority may have in granting the Application. In doing so, the Applicant has set out the relevant legislative tests within the *Liquor Act 2007 (NSW)* (the “Act”), being:

1. Community impact (section 48(5) of the Act).
2. Validity and procedural requirements (section 40 of the Act).
3. Fit and proper person, responsible service of alcohol and in force development consent (section 45 of the Act).
4. The objects of the Act (section 3 of the Act).

COMMUNITY IMPACT – SECTION 48(5)

The Applicant submits that the overall social impact of granting the licence will not be detrimental to the well-being of the local community of Helensburgh and the broader community of Wollongong.

The Applicant relies on the following:

- (a) Category B Community Impact Statement;
- (b) the Ethos Urban Assessment;
- (c) the Ethos Urban Additional Response (see **Appendix “A”**); and
- (d) the Statement of [REDACTED] (see **Appendix “B”**).

which establish that:

Objections

The Application has been subject to a campaign by incumbent businesses to generate opposition to the Application. This is not the first time these incumbent businesses have run a campaign of this type in this location.

On the Applicant’s analysis at least 226 out of the 259 submissions received (or 87%) fall into the following categories:

1. Raise concern with commercial impacts to local businesses due to increased competition.
2. Have been generated by incumbent businesses.
3. Question the “need” for “another” liquor licence.
4. That are pro forma and provide little consideration or relevant information.

The Applicant submits these submissions should be disregarded or given very limited weight. Of the remaining 33 submissions, 26 support the grant of this application. In the context of a pressurised opposition campaign the Applicant suggest the 26 favourable submissions provide a more genuine indication of the potential social impact of this application.

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Local and Broader Community

1. Helensburgh has experienced, and will continue to experience, moderate rates of population growth (approximately +70 persons per annum to 2036).
2. No social or demographic groups have a particular vulnerability or issues of specific relevance to the proposed Liquorland. The share of social housing within Helensburgh is well-below relevant benchmarks. There is no practical evidence of issue or concern relevant to the local Aboriginal and Torres Strait population in Helensburgh.
3. Households in Helensburgh have high median annual income compared to Regional NSW and Greater Sydney. Helensburgh is within the top 10% of area in Australia in terms of relative socio-economic advantage as measured by SEIFA.
4. Helensburgh experiences a high level of economic engagement. A high share of family households in Helensburgh have at least one parent working full-time relative to the NSW average. Likewise, Helensburgh's labour force participation rate is above the NSW average.
5. Outlet density of packaged liquor licences in the local and broader community, based on current population levels, are lower than the NSW average. If approved, the outlet density of packaged liquor licences will remain below levels generally considered to be potentially associated with social harm.
6. Outlet Clustering in both the Local and Broader Community is low.
7. Helensburgh's rate of alcohol related assault (both domestic and non-domestic) is below the NSW average (for the year ending March 2021) and has remained below the NSW average for at least 10 years.
8. The proposed Liquorland is not situated in a hotspot for domestic or non-domestic assault.
9. Helensburgh's rate of malicious damage to property and offensive conducts is below the NSW average (for the year ending March 2021) and has remained below the NSW average for at least 10 years.
10. Wollongong LGA has a marginally higher rate of alcohol-attributable deaths and a lower rate of alcohol-attributable hospitalisation, compared to the NSW average.
11. Helensburgh provides a regional service function for a significant surrounding area. The Coles supermarket is the primary grocery shopping destination serving the population of Helensburgh, Otford, Stanwell Park, Stanwell Tops and Coalcliff.

Positive Social Impact

The grant of the Application will:

1. Cater for the proven contemporary consumer requirements for packaged liquor in the Local Community and Broader Community to meet the consumer demand for a full range of services.

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2. Provide benefits including:

(a) Increased Convenience

An even greater degree of convenience will be offered to customers of the Coles supermarket as the proposed premises will be located immediately adjacent to the supermarket. There is presently no supermarket with an adjacent top two liquor retail brand available in the Local Community. The top two liquor retail brands have a specific appeal to a wide range of customers.

(b) One-stop shopping

One-stop shopping services to the growing community. Currently, residents who seek to shop at a top two liquor retail brand, which provide a wider variety of liquor products at competitive prices, are required to shop outside of the Local Community. As evidenced by several supporting submissions, many residents are combining their grocery shopping and liquor purchases outside of the Local Community. Accordingly, residents do not currently have a true one-stop shopping experience for groceries and liquor products within the Local Community.

(c) Revamped Liquorland format with modern, safer facilities

The Proposed store will offer a genuine point of difference for consumers with the revamped Liquorland "Black and White" design and layout to deliver a more local, relevant offer with a significantly improved range in higher growth categories (such as local craft beer and gin) which better reflects contemporary consumer demand. Additionally, the fit out and presentation of the store will be sophisticated and modern. The lay out will be customer friendly, designed to allow for easy browsing and selection of purchases whilst at the same time incorporating enhanced designing out crime features to offer a safer shopping experience.

(d) The brand and improved product range

The Liquorland brand is well known and has specific appeal to a wide range of customers. Liquorland stores stock a large range of products (approximately 1,400), of which 400 are award winning and exclusive to Coles. This provides a major point of difference. The Proposed Premises will fill a gap in the provision of a Liquorland branded store in this Local Community.

(e) Loyalty program and customer service

Customers who are members of Coles rewards programs benefit from exclusive, targeted offers in line with their preferred products based on their buying patterns. This program provides a benefit to many loyal Liquorland shoppers.

(f) Economic benefits

The following Economic benefits to the Local Community:

- i. Expenditure in the Local Community - The opening of a Liquorland store in Helensburgh is likely to attract more people and increased expenditure in the Local Community due to the one-stop shopping convenience, as set out above. This will largely prevent the current economic leakage from the Local Community. In addition, the expenditure in the Local Community by team members of the proposed premises will contribute to the local economy. The fit out and store development alone is an estimated investment worth approximately \$1,370,176.

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- ii. Increased competition - The Liquorland store will undoubtedly place itself in a situation where it can compete with established retail outlets in the Local and Broader Community. The public will benefit from this increased competition. This benefit has been specifically referenced by many supporting submissions who note that the Local Community's retail liquor market is largely monopolised by existing businesses.
 - iii. Increased employment – The Application will directly lead to 6 – 8 local employment opportunities (not including construction and fit out). This contribution to the employment market is significant in terms of jobs and employment stability. Liquorland will assist team members to access training in the responsible service of alcohol and also specific on-the-job training experience. The opportunity for training and development will make a small, but positive contribution to the skill base of the Local Community.
- (g) Contributions to local community groups
The proposed premises is likely to lead to support for Local Community groups and sport. Liquorland, as part of Coles operations, responds to community needs and expectations by contributing in ways additional to the benefits flowing from a successfully run business. Local organisations will be able to approach Liquorland for support. The Coles Group invested \$139 million into the community during the 2020 financial year. Additionally, Coles stores in NSW raised over \$1.65 million for their respective local communities, during the same period.
- (h) Contributing to the liquor industry
The abovementioned benefits will undoubtedly aid the proper development of the liquor industry, in accordance with the objectives of the Liquor Act 2007.

The specific evidence to support these benefits is contained in the statement of [REDACTED], the Ethos Urban Assessment and the Ethos Urban Additional Response.

Without limiting other aspects of those reports, perhaps the most compelling evidence of local support appears in the 26 submissions from stakeholders who support the grant of this Application. The Applicant reiterates that in the context of a pressurised opposition campaign, 26 favourable submissions, made by residents without any request or incentive to do so, provides a genuine indication of the support for the Application.

Negative Social Impact

The grant of the Application will not cause any alcohol-related harm in the Local or Broader Community due to:

1. The lack of evidence of any existing alcohol-related harm in the Local Community.
2. No social or demographic groups have a particular vulnerability or issue of specific relevance to the proposed Liquorland Helensburgh which can be identified from available information.
3. There is no actual evidence that the Liquorland will increase or unacceptably contribute to harm in the Local Community.

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4. The low level of outlet density and outlet clustering, which are below levels generally considered to be potentially associated with social harm.
5. The consistent low rates of alcohol related crime rates in Helensburgh over the past decade.
6. The fact that the majority (if not all) of the adverse submissions were generated from existing commercial competitors, who focused on historical concerns which do not reflect the current social context and contemporary demand. Limited weight should be given to those submissions as they are made by parties seeking to avoid the impacts of competition. Competition itself is not a valid ground for objection.
7. The absence of objection from the police, council or other statutory or community-based stakeholders.

Previous liquor licence applications

The Applicant acknowledges that Helensburgh has been subject to three previous packaged liquor licence applications in the last 10 years.

In 2012, two applications for packaged liquor licences were refused by the Authority (the “2012 applications”). These applications related to:

1. Chamber Cellars, situated at 37-39 Walker Street, Helensburgh.
2. Marley’s Liquor Store, situated at shop 2 and 3, 20-24 Walker Street, Helensburgh.

The Authority’s decision to refuse the 2012 applications largely centred on the need to minimise harm associated with misuse and abuse of liquor (violence and other anti-social behaviour) and to ensure that the sale and supply of liquor contributes to, and does not detract from, the amenity of community life. Notwithstanding the Authority’s refusals, it was determined in the Marley’s Liquor Store application that:

“The Authority has given no weight to submissions opposing the Application on the basis that competition will harm the incumbent local businesses. While the Authority accepts that such concern is genuinely held among some in the local community and the incumbent businesses have set out to generate opposition to the Application on this ground, the Authority’s role is to assess likely overall social impact, not play favourites among competing economic interests”.

Additionally, the Authority noted that:

“Generalised submissions questioning the need for another liquor licence also does not assist the Authority in determining whether the overall social impact of granting this licence will or will not be detrimental to the local or broader community... the Authority has given less weight to pro forma submissions than individual submissions that have provided considered and relevant information”.¹

¹ Independent Liquor and Gaming Authority, Marley’s Liquor Store (1-1431501741), 4 October 2012.

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These comments on public objections are of even more significance to the current Application given the obvious role incumbent business have played in generating high numbers of “pro forma” objections. The Applicant submits that the Authority should give limited if any weight to submissions that:

1. Raise concern with harming local businesses due to increased competition.
2. Have been generated by incumbent businesses.
3. Question the “need” for another liquor licence.
4. That are pro forma and provide little consideration or relevant information.

On the Applicant’s analysis, this means at least 226 out of the 259 submissions (or 87%) should be disregarded. Of the remaining 33 submissions, 26 support the grant of this application.

In 2013, an application was lodged for Helensburgh Premium Liquor LIQP770016690 (the “HPL application”), situated at 37 Walker Street, Helensburgh (the same premises as the unsuccessful Chamber Cellars application).² The HPL application received 81 public submissions objecting and 52 submissions in support. Police and Council also provided adverse submissions. In summary, the primary reasons for objection were:

- (b) Outlet density.
- (c) Alcohol related disturbances (including violence and vandalism).
- (d) Similar applications recently being refused.

Support for the HPL application mentioned:

- (a) Economic benefits (growth of Helensburgh’s retail precinct and preventing locals from shopping in other towns).
- (b) Support for new business.
- (c) Poor service and uncompetitive pricing from existing liquor outlets.
- (d) Increased employment opportunities.

Ultimately, the Authority granted the HPL application despite the significant number of public objections and recent 2012 refusals. In doing so, the Authority weighed the abovementioned supporting considerations, many of which are relevant to this Application, above the concerns of public objectors. **Unlike the HPL Application, police and council have not objected to the current Application.**

The Applicant submits that the Authority can be satisfied, as it was in the HPL application, that the overall social impact of the application will not be detrimental to the local community.

Harm minimisation

Liquorland is an experienced operator of many packaged liquor licences many of which conform to the business model outlined in the Application. It is well recognised for its excellent compliance record and responsible retailing. In the recent Liquorland Marsden Park decision, the Authority held:

² *Independent Liquor and Gaming Authority, Helensburgh Premium Liquor (APP-0000327662), 29 August 2013.*

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“The Authority is nevertheless satisfied that these risk factors are sufficiently mitigated by the following: absence of any objections from agency stakeholders or members of the community; experience of the applicant as an operator of multiple licensed premises with sound compliance records; harm minimisation measures set out in the plan of management and licence conditions as set out in Schedule 1.”

“Other jurisdictions have similarly held: ‘It is a notorious fact that Liquorland is a responsible entity that takes its obligations of selling a potentially harmful product seriously by way of implementing harm minimisation measures.’³

Liquorland is a national retailer with a comprehensive set of policies and guidelines to minimise harm, including:

- (a) Coles Liquor NSW Management Strategies including ID25;
- (b) Coles Liquor House Policy for the Responsible Service of Alcohol; and
- (c) Coles Liquor Refusal of Service Guidelines.

Other strategies include:

1. A responsible alcohol product ranging policy to ensure that products do not encourage the rapid and/or excessive consumption of alcohol; appeal to minors or people under the age of 25; or promote inappropriate or offensive behaviour.
2. Responsible Promotion and Advertising of Alcohol to ensure all team members understand their obligations when promoting and advertising alcohol. Coles Liquor also seeks to ensure that liquor advertising does not encourage the rapid and/or excessive consumption of alcohol; does not appeal to minors or people under the age of 25; and does not promote inappropriate or offensive behaviour.
3. Licensing Checklists - practical checklists are provided to ensure that all required documentation within the stores is held and up to date and ensures compliance with all licence conditions.

Training

RSA: All team members are required to complete an approved course in responsible service of alcohol (RSA) before starting with Coles Liquor.

All team members complete an online induction covering their responsibilities for serving alcohol in a packaged liquor store.

Online training modules - to provide the team with an in-depth understanding of their RSA obligations in a packaged liquor environment. The modules are:

1. Liquor & Tobacco Obligations - to understand key obligations for packaged liquor and tobacco.
2. ID 25 Obligations - to understand key obligations and strategies to implement ID25 policy in store.

³ *Liquorland Gateway* [LC 07/2017] at [8].

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3. Secondary Supply and Minors - to understand key obligations and strategies to deal with the issue of secondary supply and minors on premises, this includes the Coles Liquor School Uniform Policy.
4. Licensee and Approved Manager Obligations -to enable store managers and team members in charge of a premises to understand their licensing responsibilities.

A suite of online training modules and in-store induction programs also develop staff skills in:

- (a) how to handle aggressive customers;
- (b) how to act in armed hold-ups;
- (c) how to recognise if someone may be intoxicated;
- (d) face-to-face theft and refusal of service training;
- (e) controlling store loss and security; and
- (f) Serve up product knowledge.

Specific security measures for this store will include:

1. Reduced trading hours.
2. Coles Liquor will employ a designated security guard between 5pm and 9pm on Friday and Saturday nights (as per condition 2 below). The security guard will also patrol the nearby Coles car park to discourage anti-social behaviour.
3. Security film on external glass.
4. Bright lighting throughout the store.
5. A state of the art alarm system which is monitored off-site.
6. CCTV cameras covering the entire store and development.
7. Coles Liquor has also recently launched a new industry leading incident platform called 'Auror' which connects CCTV throughout its entire store network with the Police to better identify offenders. This has produced outstanding outcomes as it has assisted Coles Liquor and police to identify and significantly reduce theft (with a focus on repeat offenders) and crime in and around licensed premises; and
8. Coles Liquor will also provide Security Pendants to team members employed at the store. These are a mobile device that allows team members to alert Police to a threatening situation when they are away from the register and cannot access the void log on function. Coles Liquor anticipates that this measure will further assist to reduce theft levels at its stores.
9. Any risk associated with the granting of the Application will be mitigated by the imposition of appropriate licence conditions and by the Applicant's adherence to the measures stipulated in its plan of management. For an abundance of caution, the Applicant has proposed conditions "over and above" conditions which would ordinarily be imposed on the grant of a packaged liquor licence, including a designated security guard and reduced trading hours as set out below.

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Conditions Proposed

1. The Applicant proposes to offer **significantly reduced trading hours from the original trading hours sought**. The reduced trading hours now sought are:
 - (a) Monday to Saturday: 10:00am to 10:00pm.
 - (b) Sunday: 10:00am to 09:00pm.
2. The Applicant is to employ a security guard from 5pm until close on Friday and Saturday nights. The security guard will regularly patrol the nearby Coles car park.
3. The Applicant will join and be an active participant in the local liquor accord.
4. The Applicant agrees to comply with its extensive Coles Liquor "NSW Management Strategies" and "House Policy for the Responsible Service of Alcohol" documents as a licence condition.
5. The Applicant agrees the Authority's social impact condition.
6. The Applicant agrees to implement and maintain an incident register to record the details of any relevant incident and action taken in response to any such incident.
7. The Applicant agrees to the Authority's CCTV Condition.

VALIDITY, PROCEDURAL AND TRADING REQUIREMENTS

The Applicant submits that:

1. The Application has been validly made and meets the procedural requirements under section 40 of the Act;
2. The proposed trading hours for the Premises meet the requirements under sections 11A and 12 of the Act in respect of trading and 6-hour closure period;
3. Liquor will be sold and supplied in accordance with the authorisation conferred by a packaged liquor licence, as required by section 29 of the Act; and
4. Sections 30 and 31 of the Act do not apply to the Application, as the Premises is not intended to be used for any of the purposes specified in the section.

FIT AND PROPER PERSON, RESPONSIBLE SERVICE OF ALCOHOL AND DEVELOPMENT CONSENT

Pursuant to section 45 of the Act, the Authority has sufficient evidence to be satisfied that:

1. The Applicant is a fit and proper person to carry on the proposed business, given that no concerns regarding the Applicant's probity were raised;
2. Practices will be in place from the commencement of licensed trading at the Premises to ensure the responsible service of alcohol, having regard to the Applicant's Plan of Management ("POM") and the conditions to be imposed on the licence; and
3. The requisite development consent is in force.

OBJECTS OF THE ACT

1. According to section 48(5) of the Act, the Authority “must not grant a licence, authorization, or approval to which a relevant application relates unless the Authority is satisfied, after having regard to - the Community Impact Statement and any other matter the Authority is made aware of during the application process - that the overall social impact of the licence, authorisation or approval being granted will not be detrimental to the wellbeing of the local or broader community.”
2. The assessment of the community impact potential of the Application set out in:
 - (a) Category B Community Impact Statement;
 - (b) the statement of [REDACTED];
 - (c) the Ethos Urban Assessment; and
 - (d) the Ethos Urban Additional Response,

supports the conclusion that the overall social impact of the Application, if granted, will not be detrimental to the wellbeing of the Local or Broader Communities and will, in fact, be a positive contribution to those communities.

3. In addition, the Authority will have regard to section 3 “objects” of the Act in determining this Application. The Applicant contends that should the Application be granted:
 - (a) The proposed premises will regulate and control the sale, supply and consumption of liquor in a way that is consistent with the expectations, needs and aspirations of the local and broader community due to:
 - i. the experience of the Applicant and Business Owner;
 - ii. the various submissions supporting the new Liquorland store; and
 - iii. the comprehensive harm minimisation measures set out in the Coles Liquor NSW Management Strategies and House Policy.
 - (b) the balanced development, in the public interest, of the liquor industry due to:
 - i. the increased competition in what is a current monopolised liquor market in the Local Community;
 - ii. the lack of objections from mandatory stakeholders and special interest groups including Police and Council;
 - iii. the Applicant’s continued guarantee to resolve issues with local residents, if they arise; and
 - iv. The Applicant’s commit to several licence conditions that go above and beyond the current legislative requirements.

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- (c) The Application demonstrates the responsible development of related industry due to:
 - i. the increased employment opportunities for retail workers;
 - ii. the ability to promote the local economy;
 - iii. the Applicant's commit to further community sponsorship and donations; and
 - iv. the servicing of residents' needs and convenience.
- 4. The Applicant further contends that the objects of the Act are secured in consideration of:
 - (a) The Applicant's commitment to minimising harm associated with misuse and abuse of liquor, due to:
 - i. the Applicant's proven history of compliance and harm minimisation as one of Australia's leading packaged liquor retailer;
 - ii. the comprehensive harm minimisation measures set out in the Coles Liquor NSW Management Strategies and House Policy; and
 - iii. the Applicant's commit to several licence conditions that go above and beyond the current legislative requirements. Including the engagement of security during identified high-risk periods of misuse and abuse of liquor.
 - (b) The need to encourage responsible attitudes and practices towards the promotion, sale, supply, service and consumption of liquor, due to:
 - i. the Applicant's extensive in-house training modules that go above and beyond the legislated responsible service of alcohol requirements.
 - ii. Liquorland's site-specific security measures that ensure any impact on community is minimised; and
 - iii. the Applicant's extensive active mitigation measures stipulated in the Coles Liquor Management Strategies.
 - (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, due to:
 - i. the premises' approved development consent for its proposed use;
 - ii. lack of objection or opposition from Council;
 - iii. the servicing of residents' needs and convenience by enabling a true one-stop shopping experience in an existing retail precinct; and

- iv. the Applicant's continued guarantee to resolve issues with local residents, if they arise.
 - (d) The need to support employment and other opportunities in the live music industry, arts, tourism, community and cultural sectors, due to:
 - i. the various economic benefits that will flow from the Application being granted;
 - ii. the increased employment opportunities for retail workers;
 - iii. the Applicant's commit to further community sponsorship and donations.
- 5. The Applicant submits that the Authority can be satisfied that, in granting the Application, the objects of the Act have been considered and satisfied.

APPENDIX “A”
ETHOS URBAN ADDITIONAL RESPONSE

ETHOS URBAN

8 September 2021

Our Ref: 2210138

Mr Jon Martin
JDK Legal
Level 5, 1 Castlereagh Street
Sydney NSW 2000

Via email: j.martin@jdklegal.com.au

Dear Jon,

RE: Liquorland Helensburgh Response to Submissions

Thank you for forwarding the submissions made in relation to the application for the proposed Liquorland Helensburgh store, and in particular those made subsequently to the preparation of our **Social and Economic Review** report dated 3 June 2021 which accompanied the application.

Based on the information provided by your office, a total of 253 submissions were received for the proposed Liquorland Helensburgh of which 229 opposed the application and 24 were in support. It is also my understanding based on this information, that a large number of objections are pro forma and in response to an advertisement in the 'South Coaster' local newspaper.

This Letter responds to specific issues raised in the submissions for which a response is appropriate in the context of the matters relevant to the application, and where that matter is relevant to our expertise. For example, I have not considered in any detail the large number of submissions which have opposed the application simply on the grounds that it will result in additional competition, which is not a relevant basis for considering a new license application.

For ease of reading, the information in this response relates to four key issues which are identified across a number of submissions:

- Population and Socio-Economic indicators
- Outlet Density Considerations
- Consumer Choice and Convenience
- Risk of Harm.

I also make more general comment on other matters relevant to our expertise arising from the submissions.

1.0 Population and Socio-Economic Indicators

Population Growth

An issue raised in submissions relates to the level of population growth anticipated for Helensburgh, and the view that the level identified in the Social and Economic Review was potentially too high.

Notwithstanding this issue raised in submissions, it appears both myself and submitters agree it is reasonable to expect population growth at Helensburgh over coming years.

As identified on Page 11 of the Social and Economic Review, the population in the suburb of Helensburgh has increased from 6,490 persons in 2011 to approximately 7,070 persons in 2021. This is an increase of +580 persons or +0.8% per annum over the decade, and is based on actual ABS estimated resident population data for Helensburgh at the best fit SA1 geographic level – the smallest geographic area for which detailed population data is provided.

In preparing the population forecasts for Helensburgh identified in Table 2 (Page 11) of the Social and Economic Review, reference was made to:

- Historic trends in ABS estimated resident population data including those identified above
- New dwelling approval trends, and
- Transport for NSW population projections in 2020, specifically for the travel zone in which Helensburgh is located. These are the official State Government small area population projections and adopt the Common Planning Assumptions which are an agreed set of information used to inform Government decision-making.

Note that at the time of preparing the Social and Economic Review population forecasts for the City of Wollongong prepared by Id Consulting in 2021, and which are referenced in submissions, were not available. Previous projections prepared by Id Consulting in around 2017 were available at that time, although were obviously out-of-date and not specifically considered in the analysis.

Where submissions reference the more recently released Id Consulting forecasts prepared for the City of Wollongong in 2021, I note:

- The Id Consulting projections have no official status and are independent of the Common Planning Assumptions used by State Government decision-making
- The Id Consulting projections adopt a different geographic area to Helensburgh suburb which were adopted in the Social and Economic Review, including areas in the east at Otford and excluding some areas in the west – this is typical of Id Consulting projections which do not typically use official geographic definitions
- The Id Consulting projections also forecast population growth over coming years, although do imply a marginally lower growth rate than that adopted in the Social and Economic Review.

I note that the primary driver of population growth in Helensburgh over the past decade is natural population increase (effectively births greater than deaths). This indicates that a reasonable expectation is for this to continue for the foreseeable future, noting the lifestyle factors for Helensburgh that make it an attractive place to live. The age profile of Helensburgh (median age of 36 years) also suggests the general expectation for continued natural population growth.

Lifestyle factors are potentially more relevant for Helensburgh in a post-COVID19 period given the recent strong growth in demand for housing observed on the urban fringe of major metropolitan areas across Australia. This trend may also positively influence population growth in Helensburgh above previous expectations.

The forecast population growth of Helensburgh in the Social and Economic Review indicates an average growth of +70 persons per annum to 2036, which is marginally above the historic average growth of +60 persons per annum between 2011 and 2021. This forecast growth is highly achievable in the context of historical trends and available projections.

It does not take into account potential additional housing supply delivered through new development such as the current proposal for additional residential land at the eastern edge of the town, and any increase in local housing demand associated with changes to housing preferences in the community arising from COVID-19.

To assist the Licencing Authority, a detailed review of the population projections contained in Table 2 of the Social and Economic Review has been undertaken. Subsequently, the forecast continues to be adopted as both realistic and appropriate for consideration of the application.

In summary, it is agreed by the applicant and relevant submitters that Helensburgh has experienced, and will continue to experience, moderate rates of population growth. It is our view that this reflects increased levels of local demand for packaged liquor products, and implies a community benefit associated with enhanced facilities such as the proposed Liquorland Helensburgh to meet this increased demand.

Socio-Economic Characteristics

Some submissions note concerns regarding socio-economic characteristics of Helensburgh residents.

One issue raised is the presence of 29 social housing dwellings within Helensburgh at the time of the ABS 2016 Census of Population and Housing.

In my view, the presence of social housing in Helensburgh is neither unexpected, nor remarkable, in the context of urban areas across Australia. In any case, the share of social housing within Helensburgh (1.4% of occupied dwellings) is well-below relevant benchmarks as shown in Figure 1.

Figure 1 Share of Social housing



Source: ABS, Census of Population and Housing, 2016

Note: Helensburgh has been defined using SA1s that intersect with the suburb of Helensburgh

Other key important socio-economic factors relevant to the application remain as follows:

- **High household median income.** Households in Helensburgh have high median annual income at \$110,020 compared to the Regional NSW benchmark of \$61,200, and also above the Greater Sydney median of \$92,200. Similarly, 53.4% of households in Helensburgh are high income households compared to 26.3% in the City of Wollongong and 44.3% of households in Greater Sydney.
- **High measures of social and economic advantage as measured by SEIFA.** With a score of 1067 for the Index of Relative Socio-Economic Advantage and Disadvantage (IRSAD) and 1078 for the Index of Relative Socio-Economic Disadvantage (IRSD), and decile of 9 for both IRSAD and IRSD. Helensburgh is within the top 10% of areas in Australia in terms of relative socio-economic advantage as measured by SEIFA.
- **High level of economic engagement.** A high share of family households in Helensburgh have at least one parent working full-time (68.6%) relative to the New South Wales average (58.2%). Likewise, 73.9% of the working age population is in the labour force relative to the State average of 63.3%.

Notwithstanding that risk and harm associated with the consumption of packaged liquor can occur across the community, the above indicators suggest that in general terms the population of Helensburgh does not represent a disadvantaged community of particular socio-economic risk as relevant to the application. Indeed, Helensburgh represents a local community exhibiting relative socio-economic advantage relative to relevant benchmarks.

Notwithstanding the health and other risks associated with alcohol consumption across the community, including higher income areas, it is also the case that:

“people from lower socioeconomic groups are at greater risk of poor health, have higher rates of illness, disability and death, and live shorter lives than those from higher groups (Mackenbach 2015)” (Australia’s Health 2016, AIHW)

Some general comments in submissions relate to socio-economic factors such as the population of Helensburgh identifying as of Aboriginal and Torres Strait Island background, and the age profile of residents.

In our view, the interpretation of this information in the submissions is not helpful to the Authority. For example, the consideration of the local indigenous community includes discussion of the high share of young males. This is in the context of a very small sample size (166 persons and 90 males), and that over approximately 40% of the male population was not of legal drinking age at the time of the 2016 Census, including a third of the male indigenous population which is aged 14-years or younger. Indeed, a relevant submission notes the small total population size when identifying this issue. I understand no submission provides specific practical evidence of an issue or concern relevant to the local indigenous community in Helensburgh.

Furthermore, recent research indicates that Indigenous Australian adults are more likely to report excellent or very good health if they live in higher socioeconomic areas, have good economic prospects including employment, as well as having higher levels of educational attainment (Australia’s Health 2020, AIHW). These are favourable circumstances in the context of Helensburgh.

No reasonable indicator of specific concern arising from the socio-economic indicators has been identified in relation to the potential for harm arising from a new packaged liquor outlet in Helensburgh.

2.0 Liquor Outlet Density Considerations

Context for Need and Outlet Density

Numerous submissions identify a lack of demand for an additional packaged liquor outlet, or state that current outlets adequately serve local need in Helensburgh.

In the first instance, it is important to again note that a 'need' test does not apply in New South Wales, and thus that a locality may already be well-served by liquor businesses is not, of itself, a basis for refusing a new licence application.

That is, it is not the responsibility of applicants to demonstrate a specific economic or community need for additional liquor outlets, nor is competition of itself a valid grounds for an objection.

However, it remains relevant for the Authority to consider that an appropriate network of liquor stores is critical to meeting the contemporary expectations of consumers and the general community for access to take-home liquor products.

Helensburgh Liquorland Customer Base

Liquorland have identified the potential for a new store at Helensburgh to help meet the packaged liquor needs of the local community.

This reflects, in part, the long-standing and successful operation of the Coles supermarket in the town. The proposed Liquorland will be co-located with the supermarket and be highly convenient for Coles shoppers. For Coles specifically, the Liquorland store will provide many existing loyal customers with enhanced access to the popular Fly Buys program which is used by over 10 million card holders Australia-wide.

In considering a location at Helensburgh, Liquorland have reference to proprietary Fly Buys customer data that indicates the Coles supermarket is the primary grocery shopping destination serving the population of Helensburgh, as well as adjacent suburbs including:

- Otford
- Stanwell Park
- Stanwell Tops
- Coalcliff (to a lesser extent than above suburbs).

In this respect, it is an expected outcome that the Helensburgh town centre would include a range of services and facilities meeting the retail, commercial and other needs of this extended area for which the town is a key service centre. This includes a range of packaged liquor outlets and licenced venues.

As such, the current and future outlet density (if Liquorland is approved) is primarily a function of this wider service role of the Helensburgh town centre to which the proposed Liquorland will make a notable, although proportionate, contribution.

The concentration of numerous packaged liquor outlets in town centres serving a wider geographic customer base than their immediate locality is a relatively normal and uncontroversial outcome in many locations across Australia. No evidence exists to suggest the Helensburgh town centre has any special or unique attributes that require specific consideration in that regard.

Outlet Density Context Helensburgh

Notwithstanding the concerns of some submissions in relation to outlet density, based on current population levels with reference to the latest ABS estimated resident population data, the outlet density in Helensburgh for packaged liquor licences:

- Is currently 0.28 per 1,000 people and would increase to 0.42 per 1,000 people assuming the store opens in 2021
- Beyond 2021 outlet density levels would decline as population growth occurs.

The identified outlet density is well-below levels generally considered to be potentially associated with social harm. As noted in the Social and Economic Review, more recent investigations by Donnelly, Menendez and Mahoney (2014) into the effect of liquor licence concentrations on rates of assault in New South Wales, established a threshold of licence density above which increases in a particular licence type may have a substantial impact on assaults, both DV and non-DV assaults.¹

The research shows a sharp increase in domestic violence-related assault rates once packaged liquor licence concentrations exceeded 0.75 per 1,000 residents. Similar patterns are also found with non-DV assaults increasing when the packaged liquor concentration level goes past 0.75 per 1,000 population. For hotel licences, a threshold of 2.0 per 1,000 people was identified beyond which increases in both domestic and non-domestic violence rates were identified.

Neither of these thresholds are close to being achieved in Helensburgh, and our analysis has identified no factor suggesting expectations of a causal link between expected rates of outlet density in Helensburgh and potential social harm. As identified previously, socio-economic indicators suggest **strong levels of economic resilience and social advantage** within Helensburgh.

As a further comment, some submissions have stated to the effect that Helensburgh is bypassed and not known by a significant portion of the wider regional population, and thus demand is not influenced by tourists and visitors.

On the contrary, Helensburgh is in close proximity to the Royal National Park (more than 6 million visitors annually) and highly accessible to one of the three main park entry points, as well as a wide range of walks and natural attractions, including those in the Garawarra State Conservation Area and Woronara Dam catchment. For a component of the wider population of the Greater Sydney and Wollongong regions, Helensburgh is an important base for a range of nature and active outdoor pursuits.

3.0 Consumer Choice and Convenience

A further theme identified in the submissions relates to the relative convenience to customers of the proposed Liquorland Helensburgh and the contribution it will make to consumer choice.

One Stop Shop

A number of submissions question the benefits of the application as it relates to one stop shopping for packaged liquor, groceries and other day-to-day household items.

The fact remains that the proposed Liquorland Helensburgh is consistent with a contemporary consumer expectation for the co-location of major supermarkets and packaged liquor outlets.

¹ Donnelly N, Menendez P, Mahoney N. 2014. *The effect of liquor licence concentrations in local areas on rates of assault in New South Wales, Crime and Justice Bulletin*. NSW Bureau of Crime Statistics and Research.

By locating in direct proximity to the long-stranding and successful Coles supermarket, Liquorland Helensburgh will complement the role and function of the supermarket as the primary food and grocery shopping destination in Helensburgh and the immediate surrounding region. As identified in the Social and Economic Review report provided with the application, the proposed Liquorland Helensburgh is:

- Located a flat and unobstructed 20 metres north of the Coles supermarket
- Has weather protection between both stores
- Shares parking and accessibility arrangements with the supermarket.

Importantly, the proposed store is prominent and accessible from across Helensburgh and is also readily accessed by customers living across the surrounding region, who already visit the Coles supermarket regularly as part of their normal shopping patterns.

As a general comment only, some submissions mis-represent the commentary in the Social and Economic Review report relating to the locational attributes of the proposed Liquorland Helensburgh.

For example, at no time does the Social and Economic Review indicate that the Liquorland and Coles are anything but separate stores. Further, one stop shopping quite clearly relates to the ability to conveniently purchase packaged liquor and other goods in a single shopping trip rather, than as part of a single transaction. Any reasonable reading of the Social and Economic Review would recognise that the description of the locational attributes of the proposed Liquorland is accurate and factual.

Relative Convenience of Packaged Liquor Stores in Helensburgh

Notwithstanding the lack of a 'needs' test and that competition is not a relevant consideration for packaged liquor licencing matters, numerous submissions relate to the relative proximity and accessibility of existing liquor outlets, primarily Helensburgh Premium Liquor, to the proposed Liquorland Helensburgh.

Helensburgh Premium Liquor, as identified in the Social and Economic Review, will be a commercial competitor to the proposed Liquorland Helensburgh.

I agree with elements of the submission made on behalf of [REDACTED] relating to the relative distance of both stores from the entry to the Coles supermarket. This includes that the proposed Liquorland is:

- Closer to the Coles entry, and
- Provides weather protection between the Coles and Liquorland store entrances
- Is convenient to the existing Coles car parking accessed via the ramp.

It remains our view that the ability of Helensburgh Premium Liquor to also serve Coles supermarket shoppers in a single shopping visit is compromised by the relatively greater distance and need to cross two driveways – including the truck delivery exit from Coles, and much lower level of weather protection. This is particularly the case for Coles customers using the store carparking accessed via the adjacent ramp.

Security footage of customers with Coles shopping trolleys within [REDACTED] has been identified in the [REDACTED] submission. This is entirely consistent with our current understanding of shopping patterns and simply serves to highlight the benefit that many consumers will generate from an enhanced one stop shopping capability to be enabled by Liquorland Helensburgh.

The Helensburgh Premium Liquor store is well-presented and stocked store that will compete with Liquorland in a manner that simply reflects the normal function of the retail sector in providing competition and choice for consumers. In a market economy such as Australia, these are significant benefits in terms of economic and community outcomes which should not be under-estimated or undermined by arguments potentially influenced by commercial self-interest.

Other Consumer Considerations

A number of submissions in support of the Liquorland Helensburgh application raise the issue of price competition and additional choice.

On the basis of the submission made on behalf of [REDACTED] I accept that the price comparison provided in the Social and Economic Review (Table 9) included an incorrect price comparison between 24 and 30 packs of VB cans. The price request made to the store was for a 24 pack of cans, although it is also acknowledged that the staff member disclosed the price for a 30 pack of cans in good faith.

Liquorland do not 'price beat' or 'price match' at an individual store level. This assists in ensuring that alcohol is sold responsibly. However, Liquorland, as a brand, continues to compete with other, similar, convenience style brands to provide the best value to consumers.

It is anticipated that the proposed Liquorland will provide local shoppers in Helensburgh with a wider variety of liquor products offered at competitive prices. This will be to the benefit of local consumers, as identified in some supporting submissions.

4.0 Risk of Harm

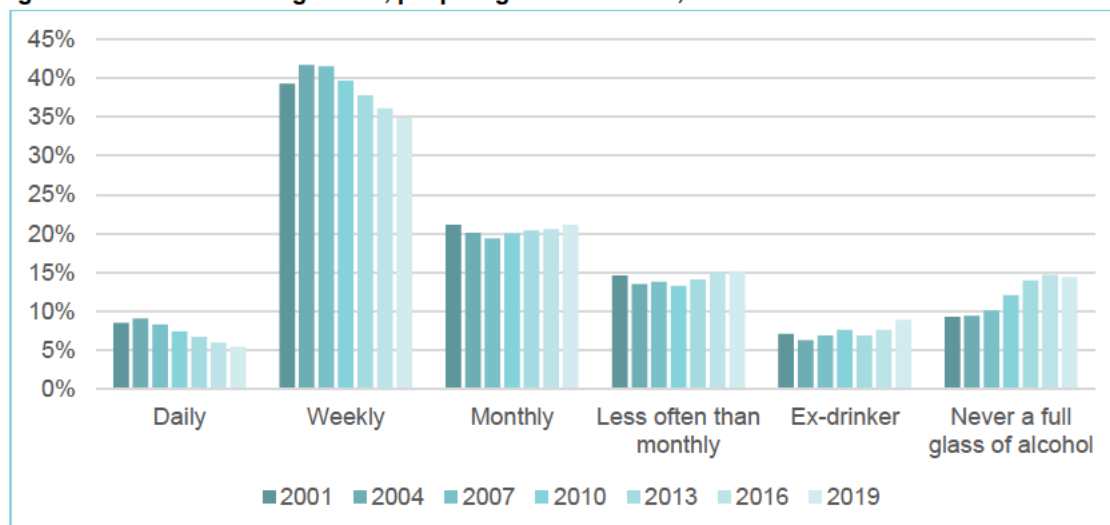
At the outset, I understand that Liquorland RSA practices are generally considered leading practice in the industry, and are regarded as a comprehensive and systematic mitigation measure against negative social impacts associated with the abuse of alcohol in the community. This includes industry leading practices to prevent underage drinking. In this respect, potential for social harm arising from the proposed Liquorland Helensburgh store will be minimised through best practice measures which have a meaningful mitigation outcome.

As previously identified, the socio-economic characteristics of Helensburgh indicate that the community has high levels of economic resilience. High household income levels have been identified and SEIFA scores indicate a high ranking for social advantage and a relatively low level of social disadvantage.

Furthermore, a review of relevant crime statistics from the Licencing Authority's Livedata tool identifies no specific measure of relative concern in Helensburgh.

The risk of harm is also informed by the fact that over the past 20-years in Australia, overall rates of daily and weekly alcohol consumption by those aged 14 years and above has declined, while the proportion of the population who have never had a full glass of alcohol has increased significantly, as shown in Figure 2.

Figure 2 Alcohol drinking status, people aged 14 and over, 2001 to 2019



Source: NDSHS 2019

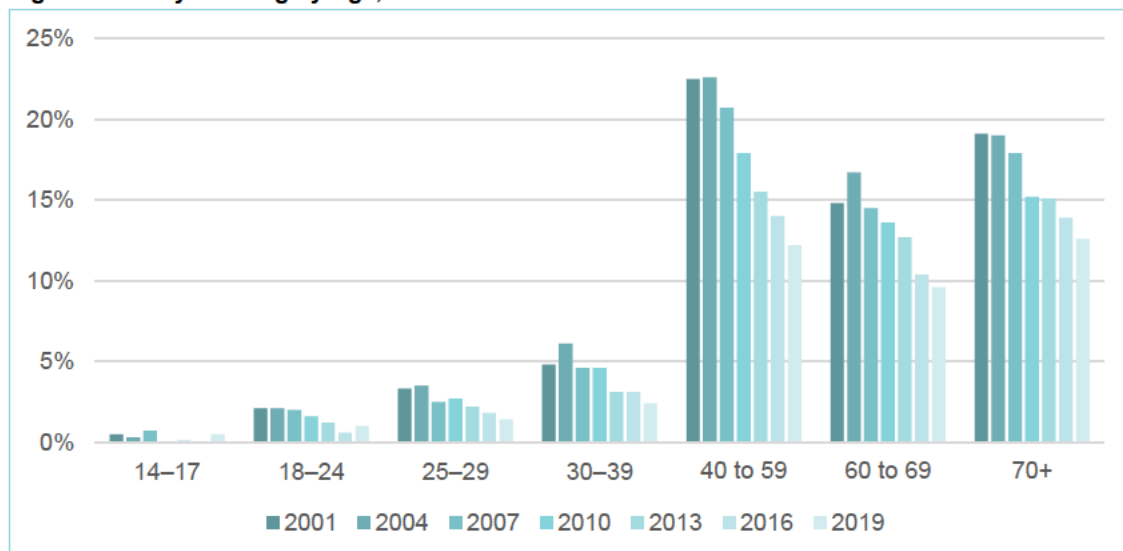
Notes: (a) Consumed at least a full serve alcohol, but has not had an alcoholic drink not in the previous 12 months.

Note: The calculation of drinking status and alcohol risk variables was updated for all years in 2019. Trend data may not match previously published results.

While the data indicates that males aged 15 to 24 experience nearly two times the burden of disease from alcohol compared to females (AIHW, 2021), the trend is for an increasing proportion of people aged 14 to 24 years to abstain from alcohol (AIHW, 2020; AIHW, 2021)

A decline in the frequency of the consumption of alcohol is also a trend that is present across all age groups (see Figure 3). For example, the share of the population aged 40 years to 59 years who consume alcohol daily has declined from 22.5% in 2001 to 12.2% in 2019.

Figure 3 Daily drinking by Age, 2001 to 2019



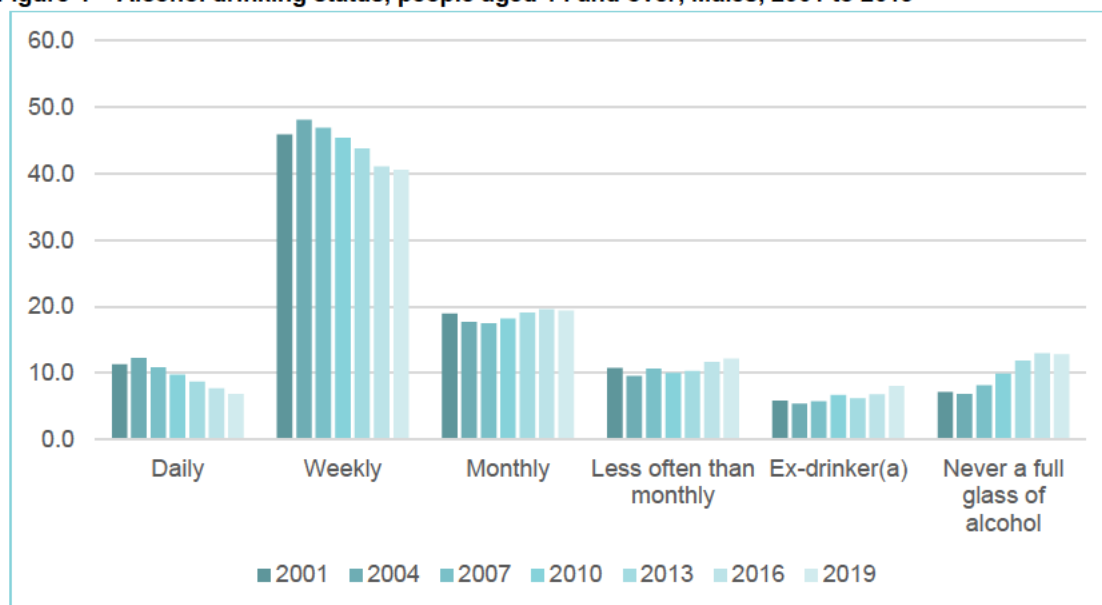
Source: NDSHS 2019

Note: The calculation of drinking status and alcohol risk variables was updated for all years in 2019. Trend data may not match previously published results.

Estimates for persons aged 14 to 17 should be interpreted with caution due to high standard errors (standard error of 25% to 50%) and even some estimates that are unsuitable due to high level of sampling error (i.e. relative standard error of 51% to 90%).

Similarly, this declining trend is also present for Males where the frequency of daily alcohol consumption has declined from 11.3% in 2001 to 6.9% in 2019 (see Figure 4).

Figure 4 Alcohol drinking status, people aged 14 and over, Males, 2001 to 2019



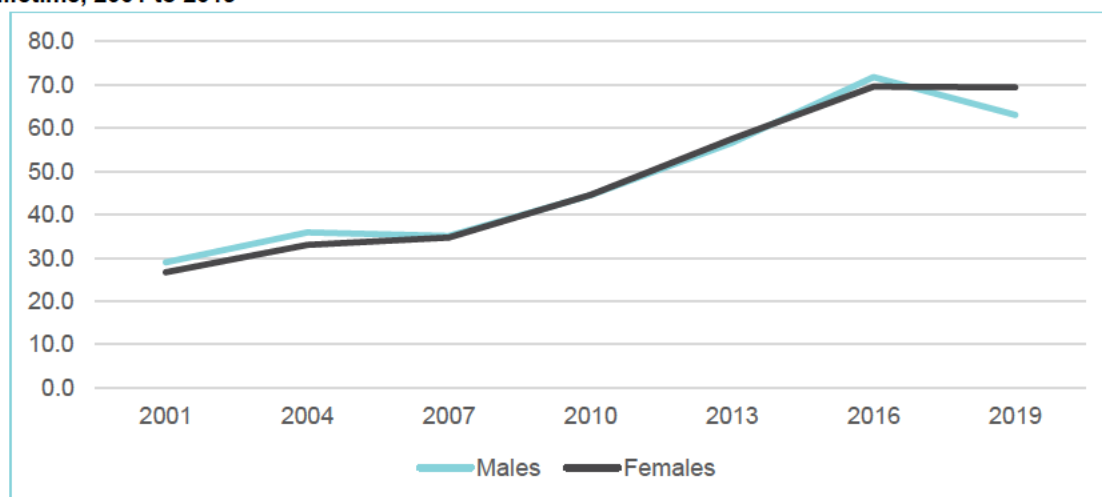
Source: NDSHS 2019

(a) Consumed at least a full serve alcohol, but has not had an alcoholic drink not in the previous 12 months.

Note: The calculation of drinking status and alcohol risk variables was updated for all years in 2019. Trend data may not match previously published results.

Alongside this decline in alcohol consumption is an increase in the share of persons who have never consumed a full serve of alcohol. A look at persons aged 14 to 17 years reveals that the share who have never consumed a full serve of alcohol in their lifetime has been steadily increasing from below 30% in 2001 to above 60% in 2019 (see Figure 5).

Figure 5 Share people aged 14–17 years who have never consumed a full serve of alcohol in their lifetime, 2001 to 2019



Source: NDSHS 2019

Similar trends are also present among the indigenous population, with a reported decline in the share of people or exceeding the lifetime risk or single occasion risk alcohol guidelines (NDSHS, 2019, p. 63).

An examination of Priority population groups chapter data from the National Drug Strategy Household Survey 2019 reveals that the share of the indigenous population who have not consumed alcohol in the previous 12 months has increased from 25.1% in 2010 to 29.3% in 2019 (see **Table 1**).

Similarly, the share classified as having a life time low risk has increased from 42.8% to 51.4% between 2010 and 2019, while the share of indigenous people classified as lifetime risky has declined substantially from 32.2% in 2010 to 19.3% in 2019.

Table 1 Alcohol Consumption by Indigenous Status, people aged 14 and over, 2010 to 2019

Heading	2010	2019
Abstainers/ ex drinkers ^a	25.1%	29.3%
Lifetime risk: Low risk ^b	42.8%	51.4%
Lifetime risk: Risky ^c	32.2%	19.3%

Source: NDSHS, 2019

Notes: small sample sizes; excludes data from indigenous remote communities.

a. Not consumed alcohol in the previous 12 months.

b. According to 2009 NHMRC guideline 1: On average, had no more than 2 standard drinks per day.

c. According to 2009 NHMRC guideline 1: On average, had more than 2 standard drinks per day

It is important to recognise that the opening of Liquorland Helensburgh, in and of itself, does not necessarily lead to social harm. Any potential at risk groups are already present within the community and able to access existing packaged liquor stores, hotels, and online sales channels.

Even if an at-risk person or group was to purchase liquor from the proposed Liquorland Helensburgh, then those sales would most likely be made in lieu of sales from an existing liquor store.

This is reflected in the reality that declining trends in alcohol consumption have coincided with growth in the number of packaged liquor stores over time.

Overall, the proposed Liquorland Helensburgh will deliver a packaged liquor outlet to the community that generates a net community benefit and which implements harm minimisation measures that are Australian best-practice. This results in a relatively low risk of harm arising from the application in matters relevant to my expertise.

5.0 Other Matters

In relation to other matters, I note that:

- Council and the Police have considered the application and have no objections to the proposed packaged liquor licence
- Of the supporting submissions, a range of benefits to the local community as a result of the proposed Liquorland store are noted. In particular, competition to provide improved pricing and a wider variety of packaged liquor products, and increased local employment opportunities.

★

I trust the above information is of assistance in providing context to the submissions received as part of the Liquorland Helensburgh application.

If you wish to discuss further, please do not hesitate to contact me on 0415 361 784.

Kind Regards,

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

Sean Stephens
Group Director, Economics
sstephens@ethosurban.com

APPENDIX "B"
STATEMENT OF [REDACTED]

STATEMENT OF TRISTAN ARNOLD

PREMISES: Liquorland Helensburgh at 19-33 Walker Street, Helensburgh NSW 2508

1 I, [REDACTED] of [REDACTED] State Manager (Operations) – New South Wales (NSW), state as follows:

2 I have held the position of State Operations Manager at Coles Liquor since June 2021.

Qualifications and Experience

3 I have over 10 years' experience in retail operational management across a number of retailers in Australia and New Zealand in roles that have included:

- (i) Assistant State Manager – Coles Liquor
- (ii) Operations Manager – Coles Liquor
- (iii) State Manager VIC/TAS - Jeanswest
- (iv) Country Business Manager (New Zealand) – Jeanswest
- (v) Regional Business Manager (NSW) - Jeanswest
- (vi) National Visual Merchandise & Marketing Manager – G-Star Raw

4 I have completed a Responsible Service of Alcohol (**RSA**) course and hold a current RSA certificate of compliance dated 06 September 2019.

My Role

5 Each Coles Liquor store has a Store Manager, who reports to an Area Manager who in turn reports to me as State Manager. I have a team of nine Area Managers and an Assistant State Manager who reports to me on the operations of the 182 Liquorland, First Choice, and Liquor Market stores in NSW/ACT and northern VIC.

6 My role as State Manager includes a number of responsibilities, such as:

- (a) ensuring compliance with legislative requirements, such as responsible service of alcohol, and with company policies and procedures;
- (b) setting and maintaining the operational costs for each store to ensure that each store operates efficiently; and

- (c) providing a career path and training for all employees and, in particular, coaching and mentoring Area and Store Managers.

The Liquorland Brand

- 7 Liquorland stores are typically the convenience outlets within the Coles Liquor portfolio. They are frequently positioned close to Coles supermarkets to provide supermarket shoppers with the opportunity to combine packaged liquor purchases with other shopping, usually as part of a weekly or regular grocery shop. Approximately 70% of Liquorland stores in NSW are co-located with a Coles supermarket.
- 8 Liquorland customers are generally convenience shoppers who purchase low quantities of alcohol as part of their grocery shop. They generally know what they are after and spend little time browsing. As a result, they tend to appreciate the everyday value that is offered by Liquorland stores.
- 9 To accommodate this, Liquorland stores tend to emphasise value for single item purchases, rather than bulk purchasing or bundle buys. I anticipate the Liquorland Helensburgh store will do the same.
- 10 Feedback received from customers by our Coles Liquor team members as well as our internal customer insights is that customers value the co-location of Coles supermarkets with Liquorland stores, particularly in neighbourhood shopping centres where customers are conducting their daily or weekly shopping.
- 11 Liquorland stores look to offer everyday value for a range of products. Liquorland stores hold, on average, 1,400 lines of stock (SKU). The range of liquor can be roughly divided up as follows:
 - (i) wine – 56%;
 - (ii) RTDs (ready to drink products) – 12%;
 - (iii) spirits – 19%; and
 - (iv) beer – 13%.

- 12 While the range of products carried by each Liquorland store is based on Liquorland's usual core product range, the Store Managers for each store have a discretion to adjust the range to meet local demand.
- 13 Coles Liquor remains committed to stocking locally made and produced wines. We identify and celebrate all locally made product lines at all of our stores. This practice encourages the purchase of locally made products, which in turn supports the local economy.
- 14 The price for products in Coles Liquor stores is set for metropolitan areas. As a result of this, Coles Liquor stores do not 'price beat' or 'price match' at an individual store level. This assists to ensure that alcohol is sold from Coles Liquor stores responsibly. However, Liquorland, as a brand, continues to compete with other, similar, convenience style brands to provide the best value to consumers.
- 15 All Coles Liquor team members have extensive product knowledge through an interactive online platform called 'ServeUp'. This provides an in-depth product knowledge for beer, wine and spirits as well as customer service and patterns and trends in the industry.

Liquorland Helensburgh

- 16 In relation to the proposed Liquorland Helensburgh, the gross floor area will be approximately 172 square metres in size with the selling floor area being 157 square meters.
- 17 Liquorland Helensburgh will be located in the Helensburgh Plaza, with the existing Coles Supermarket. It is intended to offer full-line, convenient, modern and pleasant shopping facilities to service the needs of the local and broader community. The location of the proposed Liquorland store, within the existing Helensburgh Plaza, will provide shoppers with the convenience of a one stop shopping experience. Significantly, there are no packaged liquor outlets accompanying a supermarket in all of Helensburgh. It is anticipated that the proposed Liquorland will provide local

shoppers with a wider variety of liquor products, offered at competitive prices, without the need to shop outside the local community.

- 18 The proposed Liquorland will be located within the Helensburgh Plaza, situated at 19-33 Walker Street, Helensburgh. The Plaza is anchored by a Coles supermarket, and includes a speciality butcher and bakery.
- 19 In addition to the standard security and theft measures employed at our stores the Store will have site specific security measures that will mitigate the risk of theft and other anti-social behaviour detailed further below.
- 20 The trading hours of the proposed Liquorland store will be (incorporating a 6 hour shutdown) 10am to 10pm Monday to Saturday and 10am to 09pm on Sunday. However, actual trading hours may be reduced according to seasonal demand. Coles
- 21 Liquor has been continuing to develop and rebrand the Liquorland store design to ensure that Liquorland remains at the forefront of customer service in Australia. The rebranding will include the following key design measures:

The new black and white aesthetic appearance of the store will continue to be immediately recognisable as a 'Liquorland'. The new design conveys a more distinguished brand than previously and appeals to today's more discerning customer.



The store will have re-designed signage such as the 'Beer District' and 'Spirits Trail', allowing consumers to easily identify where their preferred varieties of product are located



This re-modelled 'Wine Region' signage improves customers' ability to navigate between red and white wine and also varieties and blends.



The new design will create dedicated spaces featuring locally sourced, craft and boutique products to make this store more locally relevant for customers and provide another avenue to market for local producers.



The cool room at the store has been specifically designed to allow easy access and navigation for consumers with trolleys as it features a wide path and accessible product lines.



The store will include special section for local NSW wines to make this store more locally relevant for customers and providing another avenue to market for local producers.



- 22 Coles Liquor believes that, not only will this increase consumer convenience, but it will also promote the responsible consumption of alcohol as it encourages the consumption of packaged liquor with food and endeavours to ensure that its product range will appeal to a more sophisticated clientele. Based on my knowledge, I believe that this level of customer convenience is more developed than at the other packaged liquor outlets in the locality.
- 23 Liquorland Helensburgh will be operated by Coles Liquor as part of its national chain of Liquorland stores. The store will be similar to, and have the following facilities common to, Liquorland stores:
- (i) a good selection of beers, wine and spirits available at competitive prices;
 - (ii) a cool room with glass door access for the storage and selection of cold beers, wine, and ciders;
 - (iii) shelving, as used by all Liquorland stores, will line the walls and carry a comprehensive range of products.
 - (iv) display units, including for Liquorland advertised specials, will be located within the floor display area;
 - (v) the fit out will be customer friendly, designed to allow for easy browsing and selection of purchases;
 - (vi) cash registers to accept purchases, with EFTPOS and all major credit card facilities;
 - (vii) appropriate staffing levels to ensure a high quality service at all times, particularly during peak trading periods; and
 - (viii) occasional wine tasting sessions will be held in the store.
- 24 Liquorland stores are smaller format packaged liquor outlets that provide a convenient option for local customers. A wide selection of liquor products, comprising wine, beer

and spirits is available to customers at good everyday value. Liquorland also stocks a wide variety of exclusive products.

- 25 Liquorland's convenient neighbourhood stores where customers can quickly shop for smaller purchases, can be contrasted with the 'big box' liquor outlets where customers have the opportunity to purchase larger volumes and browse for longer. The provision of the Liquorland offering in Helensburgh will be of significant benefit to local customers of the store. The Liquorland Helensburgh store will be bright, clean and have an open layout.

Security features of the store

- 26 Coles Liquor has analysed the proposed site of the store and has considered the locality in which the store will be located, particularly the store's proximity to any sensitive premises and surrounds. Coles Liquor is committed to implementing the following site-specific security measures to ensure that any impact on the community is minimised:
- (i) security film on external glass;
 - (ii) bright lighting throughout the store;
 - (iii) a state of the art alarm system which is monitored off-site;
 - (iv) CCTV cameras covering the entire store and development; and
 - (v) duress pendants issued to all team members.
- 27 In addition, Coles Liquor has also recently launched a new industry leading incident platform called 'Auror' which connects CCTV throughout our entire store network with the Police to better identify offenders. This has produced outstanding outcomes as it has assisted Coles Liquor and police to identify and significantly reduce theft (with a focus on repeat offenders) and crime in and around licensed premises.
- 28 Coles Liquor will also provide Security Pendants to team members employed at the store. These are a mobile device that allows team members to alert Police to a threatening situation when they are away from the register and cannot access the void

log on function. Coles Liquor anticipates that this measure will further assist to reduce theft levels at its stores.

- 29 The security measures identified above should minimise the instances of theft or anti-social behaviour. I also believe these measures may lessen the impact of the store on the local community and sensitive premises.
- 30 The security measures put in place at Coles Liquor stores is at the forefront of global best practice.
- 31 Having regard to the location of the store, the location of the plaza within the locality and Coles Liquor's experience operating an existing store within the locality, I believe that the security measures proposed above will successfully mitigate any adverse impact on the local community arising from the operation of the store. I base this belief on my industry experience as State Manager and the measures that Coles Liquor has implemented at comparable stores.

Liquorland and Coles Liquor Responsible Sale of Alcohol Policies

- 32 Coles Liquor takes the responsible service of alcohol very seriously. Coles Liquor has been, and continues to be, committed to building a reputation in the NSW packaged liquor retail market for Liquorland stores having a minimal impact on the community and facilitating the sale of alcohol in a responsible way.
- 33 Coles Liquor operates over 271 packaged liquor outlets in NSW and is an experienced licensee in NSW with an enviable compliance record. I believe that the Coles Liquor harm minimisation policies, which have been developed over time with the benefit of Coles Liquor's extensive experience in the State, ensure that alcohol is sold from Coles Liquor stores in a responsible manner and demonstrate that Coles Liquor is a market leader in compliance.
- 34 As evidence of the importance of and serious regard had towards compliance and general acknowledgement by Coles Liquor and the Respondent that liquor retailers have a responsibility to the community, I wish to draw the attention of the authority to

the comprehensive document prepared by Coles Liquor titled *“Licensing and Compliance”* booklet. This booklet is designed to be the team’s ‘go to’ on all things licensing and safe trading. It provides a comprehensive summary of the licensing obligations and responsibilities as a Coles Liquor team member.

35 It is clear from the detailed, comprehensive and nationwide subject matter of this document that Coles Liquor is well versed in its responsibilities as a liquor retailer and may be regarded as an industry leader in this area.

36 The most important issues relevant to this proceeding and detailed in the *“Licensing and Compliance”* booklet are:

- (i) Responsible Service of Alcohol;
- (ii) Sales to Minors;
- (iii) Identification and Proof of Age Documents;
- (iv) Secondary Supply of Liquor;
- (v) Intoxication;
- (vi) Refusal of Service;
- (vii) Required Liquor Signage;
- (viii) Liquor Advertising; and
- (ix) Coles Liquor “School Uniform Policy”.

37 The requirement of Coles Liquor for all packaged liquor stores to comply with the *“Licensing and Compliance”* booklet is in addition to the requirements imposed on the holders of Packaged Liquor Licences by both the Liquor and Gaming NSW and under the *Liquor Act 2007* such as the NSW harm minimisation strategies document.

38 It is a policy of Coles Liquor and the Licence Applicant to implement regular RSA training in all its packaged liquor stores. This training includes formal RSA training relevant to the state in which the premises is located as well as on-going training and reinforcement of the key responsibilities and obligations regarding RSA.

39 By way of examples of the commitment of Coles Liquor to on-going training of team members, Coles Liquor implements:

- (i) The Coles Liquor *"House Policy"*;
- (ii) The national *"Mystery Shop Program"*;
- (iii) Dedicated in-store Licensing Folder;
- (iv) Annual *"National Licensing and Safe Trade Week"*;
- (v) Internal Coles Liquor "RSA Awareness Training";
- (vi) Coles Liquor *"Liquor Retailers Leaders Programme"*;
- (vii) Coles Liquor *"Our Community in Mind"* materials in all packaged liquor stores;
and
- (viii) Explicit contractual requirement for all staff to comply with Coles Liquor policies.

40 As you can appreciate, Coles Liquor has a strict RSA policy. Failure to adhere to the policy may result in an employee receiving a warning or, if the breach is sufficiently serious, having their employment terminated.

41 Each team member who is likely to spend time on the store floor must undertake Liquorland's induction training, as well as an RSA course. The Liquorland induction program covers topics such as:

- (i) code of conduct and behaviour standards;
- (ii) company policies, including compliance, fair trading, tobacco, liquor licensing, equal opportunity, safety and asset protection; and
- (iii) compliance with liquor licensing laws, including the responsible service of alcohol, signage requirements and other operational requirements.

42 During the course of their employment, team members are required to complete training on the following topics:

- (i) dealing with aggressive customers;
- (ii) armed hold-ups;
- (iii) controlling store loss and security;
- (iv) the likely indicators of someone being intoxicated; and
- (v) product knowledge.

- 43 As part of our training, we require all team members to confirm in writing that they understand their obligations to comply with liquor licensing laws and that a breach of those obligations could result in their dismissal from employment.
- 44 We issue regular communications and updates to our team to ensure that they fully understand their obligations and our policies.
- 45 Liquorland has an ongoing compliance program whereby we constantly remind our team members of their obligations to comply with liquor licensing laws. This is done through a variety of different communication methods, including:
- (i) a suite of online training programs to educate all team members on their RSA obligations; and
 - (ii) licensing and compliance manual, guidelines, audit checklists and customer service and management procedures, which are available for all team members via an intranet.
- 46 Notwithstanding it is typically a condition endorsed on a licence, it is also a Coles Liquor business requirement that all stores actively participate in their local liquor Accord. It is very important that our teams engage with local Accords and continue Coles Liquor's commitment to the local community to ensure a timely identification of alcohol-related issues, which can then be efficiently addressed.
- 47 Coles Liquor is dedicated to training local NSW employees. An example of this is the Coles Liquor '*Liquor Retail Leaders Program*', which looks to encourage and develop leaders in the industry from NSW.
- 48 In addition, Coles donates generously to various charities and appeals throughout Australia including:
- SecondBite Winter Appeal;
 - The Drought Appeal ;
 - The Red Cross;
 - Redkite; and
 - Bushfire Relief (most recently)

Coles invested approximately \$139 million in the community during the 2020 reporting year. This investment includes cash donations, time and in-kind donations made by Coles Group companies to community causes across Australia. Coles Group stores in NSW have been responsible for raising \$1,664,267 in donations over the same period.

- 49 One of Coles Liquor's strategies is to actively contribute to the local community in a sustainable way. Recently, Coles Liquor ran the 'Drop of Good' fundraising and awareness campaign with Clean Up Australia. As part of the campaign, Coles Liquor donated 25 cents from all transactions at Liquorland, First Choice and First Choice Liquor Market stores across Australia between 6 and 7 March 2021. The campaign raised over \$125,000 for Clean Up Australia, with the funds to be used to assist thousands of volunteers to clean up their local parks, beaches, rivers and outdoor spaces in their local community. In addition to raising funds, members of the Coles Liquor team also participated in the clean-up efforts.

Training team members to deal with at-risk communities responsibly

- 50 It is Coles Liquor's policy to protect the amenity and good character of the premises and to minimise disturbance to persons living in the local community.
- 51 It is the policy of Coles Liquor to notify the Police where team members become aware of persons consuming liquor in a public place. In addition, we do not supply liquor to persons whom we reasonably believe are likely to consume liquor in a public place. Each store maintains an incident register which records any incidents that occur in the store, such as any refusals of service or aggressive or disorderly patrons. Coles Liquor regularly supplies team members with an interactive check list designed to enable team members to appropriately handle aggressive customers.

Harm minimisation

Measures directed towards youth

- 52 Coles Liquor strictly enforces our RSA policy which prohibits the sale of liquor to any person who cannot prove that they are above 18 years of age. Team members at all stores regularly conduct ID 25 checks, requiring anyone who appears to be 25 years or younger to be asked for proof of age. There is signage displayed in all of Coles Liquor's stores which informs customers about ID 25 checks and that it is an offence to purchase liquor to supply to a minor (secondary supply).
- 53 Further, team members are assisted in complying with their legislative obligations by Coles Liquor's proof-of-age ready ID prompt, a software prompt to remind team members to check ID at the beginning of each transaction and to help team members to quickly calculate proof of age.
- 54 Coles Liquor is a market leader in RSA and in addition to the rigorous compliance programme referred to above, we strictly implement our own "*School Uniform Policy*" referred to elsewhere in this statement under which, irrespective of the persons age and the validity of any proof of age documents, a person wearing a school uniform must be refused service.

Measures directed towards the proposed store

- 55 Coles Liquor has had regard to the location of the Liquorland Helensburgh, both within the plaza and its location within the local community, in planning security measures for the store. The store will form part of the plaza, which will ensure that it is in a location with high activation, which will discourage theft.
- 56 The store has been designed to optimise safety and security, with store entry controlled with a single entry point. The single entrance and store layout will provide for an unobstructed view from the store and supervision of all customers entering and exiting. The clear line of sight into the store will also enable passive surveillance from outside the store by passers-by and nearby businesses.
- 57 Further, using the benefit of our experience in the packaged liquor market, Coles Liquor has developed harm minimisation policies to ensure that its licensed premises comply with these objectives. As the operator of over 271 stores in NSW, Coles Liquor has the

requisite experience to develop and implement suitable harm minimisation plans to ensure the Store will be operated in a responsible manner. Coles Liquor is dedicated to ensuring that its reputation within the NSW market continues to be built on minimising its impact on local communities, while also ensuring that consumers can conveniently purchase packaged liquor.

58 In addition to developing and implementing such policies, Coles Liquor has considered harm minimisation in all facets of store design. As discussed above, best practice security will be implemented at the store, the internal fit-out of the Store has been specifically designed to appeal to sophisticated clientele and store team members will know their duties in respect of harm minimisation and will be reminded of these duties regularly. Importantly, these policies are designed to be applicable across the State – in suburbs with good and poor social health. In this instance, given the strong demographics and minimal groups that are at risk of alcohol related harm in the local area, I believe that these harm minimisation policies will be sufficient to ensure that alcohol related harm and ill-health is mitigated as much as possible.

Advertising policies

59 As general principles, Coles Liquor seeks to ensure that its liquor advertising:

- (i) should not encourage the rapid and/or excessive consumption of alcohol;
- (ii) should not appeal to minors or people under the age of 25; and
- (iii) should not promote inappropriate or offensive behaviour.

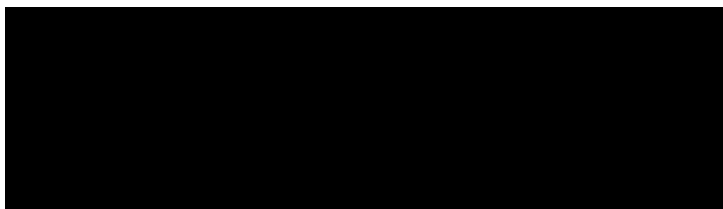
60 Coles Liquor also has its own 'Responsible promotion and advertising of liquor guidelines'

61 In terms of the labelling of products that Coles Liquor carries, we fully comply with all relevant laws and only carry stock with approved product labels. For products where Coles Liquor has control of the labelling, such as private label products, we ensure that we comply with all legislative requirements.

- 62 Further, Coles Liquor is also a founding signatory to DrinkWise and regularly participates in DrinkWise programmes. For example, Liquorland's private label wine has the DrinkWise Pregnancy logo.
- 63 Coles Liquor is also a signatory to the Alcohol Beverages Advertising Code (**ABAC**). It takes its alcohol advertising obligations and responsibilities very seriously and is committed to industry best practice. The ABAC vets all major Liquorland campaigns prior to their release to ensure that they meet community standards.
- 64 Liquorland's marketing material, means of communication and overall behaviour are consistent with the spirit of ABAC and its Responsible Alcohol Marketing Code. As a business Coles Liquor has established a strong culture of Compliance education and training to ensure its team have the necessary skills and expertise to successfully navigate this heavily regulated environment.

Conclusion

- 65 In conclusion, I believe that Liquorland Helensburgh will be of benefit to the local community and the surrounding suburbs and the general community and the



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LIQUORLAND HELENSBURGH - APPLICANT'S RESPONSE TO SUBMISSIONS MADE AT COMMUNITY MEETING

Firstly, Liquorland acknowledges the concerns raised by stakeholders at the Community Meeting held on 4 April 2022. It appreciates the views expressed by members of the community and has taken on board the relevant matters raised in preparing this response.

To a large extent the concerns raised mirror issues identified by stakeholders in written submissions. The Applicant has addressed those issues as part of the application and the Applicant continues to rely on the material submitted to the Authority.

A number of additional concerns which were raised at the public meeting are not relevant to the application for a packaged liquor licence. These include: the 'need' for another packaged liquor licence; adverse impacts on competition and perceived operational deficiencies in the Coles Supermarket.

Further, whilst recognising the passion of those who participated in the public meeting, it is clear from submissions made both before and after the public meeting that there are many people in support of the application who did not feel comfortable expressing those views in a public forum.

To supplement the material lodged with the Authority, the Applicant provides the following responses on issues raised at the public meeting.

The Statistics: Local and Broader Community

It was suggested at the public meeting that the licensed premises density statistics alone should justify a refusal of the application. However, and notwithstanding we are not aware

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of the source or reliability of the statistics quoted in the meeting, there is a cogent body of evidence as part of the Application which concludes:

1. Helensburgh has experienced, and will continue to experience, moderate rates of population growth.
2. No social or demographic groups have a particular vulnerability or issues of specific relevance to the proposed Liquorland.
3. Households in Helensburgh have high median annual income compared to Regional NSW and Greater Sydney. Helensburgh is within the top 10% of area in Australia in terms of relative socio-economic advantage as measured by SEIFA.
4. Helensburgh experiences a high level of economic engagement.
5. If approved, the outlet density of packaged liquor licences in the local and broader communities will remain well below levels generally considered to be potentially associated with social harm. The rate of 0.75 licences per 1,000 persons is the rate most commonly identified as correlating with a change in adverse social impacts¹. Based on the Live Data Tool statistics, approval of this application would result in a rate of 0.47 licences per 1,000 persons.
6. Comparative outlet clustering in both the Local and Broader Community is low.
7. Helensburgh's rate of alcohol related assault (both domestic and non-domestic) is below the NSW average (for the year ending December 2021) and has remained below the NSW average for at least 10 years. The Live Data Tool records the following:

"In the year to December 2021, the rate of alcohol-related domestic assault in the suburb of Helensburgh was 176.3. This was higher compared to the Wollongong LGA rate of 172.9. It was higher compared to the rate for Major Cities of Australia (NSW) (90.2), and lower compared to the rate for all NSW (223.9)."

8. The proposed Liquorland is not situated in a hotspot for domestic or non-domestic assault based on the Live Data Tool. Further, alcohol consumption trends in NSW show a significant improvement with people far less likely to engaged in risky drinking and people drinking less frequently.

Positive Social Impact

Liquorland re-iterates that there are a number of benefits of the proposed new store including:

¹ 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 2014

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1. Increased Convenience - There is presently no supermarket with an adjacent top two liquor retail brand available in the Local Community. This benefit extends to the additional service of click and collect (referred to at paragraph 7(a) below).
 2. One-stop shopping - As evidenced by several supporting submissions and in line with contemporary expectations and aspirations of the public, residents do not currently have a true one-stop shopping experience for groceries and liquor products within the Local Community.
 3. Revamped Liquorland format with modern, safer facilities - The Proposed store will offer a genuine point of difference for consumers with the revamped Liquorland “Black and White” design, range and layout (referred at paragraph 7(b) below).
 4. The Liquorland brand and improved product range - The Liquorland brand is well known and has specific appeal to a wide range of customers. The proposed Premises will be able to clearly differentiate its offer compared with existing outlets and provide greater choice in the Local Community by stocking:
 - 400 products exclusive to Liquorland, a number of which are award winning;
 - Approximately 140 locally produced NSW wines and beers;
 - A large range of no and low alcohol.
 5. Loyalty program and customer service – The Coles Rewards Flybuys program provides a benefit to many loyal Liquorland shoppers which does not exist at any other outlet.
 6. Economic benefits
 - (a) Expenditure in the Local Community – The opening of a Liquorland store in Helensburgh is likely to attract more people and increased expenditure in the Local Community. Further, the fit out and store development alone is an estimated investment worth approximately \$1.3 million.
 - (b) Increased competition - This benefit has been specifically referenced by many supporting submissions. Competition is a normal part of the retail sector. Despite the submissions made at the public meeting, it is well established that consumers and the economy both benefit from a competitive retail environment, for reasons which are as relevant to Helensburgh as they are for any other part of Australia.
 - (c) Increased employment – The Application will directly lead to 6 – 8 local employment opportunities.
 - (d) Contributions to local community groups - The proposed premises is likely to lead to support for Local Community groups and sport. The Coles Group invested over \$142 million (donations and in kind) into the Australia community during the 2021

financial year. Additionally, Coles stores in NSW raised over \$1.65 million for their respective local communities, during the same period. Coles Liquor itself has raised over \$240,000 in the last two years for Clean Up Australia with those funds being used to clean up local parks, beaches, rivers and outside spaces and care for the environment in communities all across Australia.

Although not strictly relevant to this application, in response to submissions at the public meeting about the extent of existing community contributions, the Helensburgh Coles Supermarket has recently provided support through donations to the following groups within the Helensburgh community:

- Hope Church;
- Symbo Wildlife Park;
- Helensburgh Tigers Rugby League Club;
- Helensburgh-Stanwell Park Surf Club;
- Coalcliff Surf Club;
- In the Bag; and
- Wollongong Homelessness Winter Jacket Appeal.

7. Additional Positive Considerations Arising After Lodgement

(a) Increased demand for Click & Collect

Since the Application was lodged, Liquorland has observed a substantial shift in consumer behaviour. Specifically, over the course of the COVID-19 pandemic, consumer demand for “Click & Collect” delivery offerings have dramatically increased.

Click & Collect enables consumers to purchase products online and simply arrive at the store for collection. This greatly reduces the time consumers spend physically inside stores browsing for products. The benefit of this offering is two-fold. First, it enables consumers to spend less time in contact with members of the public – an important feature during the ongoing pandemic. Secondly, Click & Collect provides a significantly greater level of shopping convenience.

Consumers now expect that major supermarket brands offer this level of convenience. If the Application is approved, residents of Helensburgh will be provided with the increasingly desired Click & Collect shopping convenience that is currently unavailable in the local community.

(b) Liquorland Black & white re-branding

The Application was lodged at a time when the Liquorland’s re-created brand and store design had just been launched. Whilst details of the black & white rebranding were included in the Application, the overall benefit could not at that time be

measured by specific customer feedback. The response from customers throughout NSW has been overwhelmingly positive. The re-branding is more than simply a change of colour. Liquorland stores across Australia have been re-designed to offer greater consumer convenience and further support local product ranges. This is now a tangible benefit which warrants additional consideration. An overview of Liquorland's re-branding is provided at Annexure A.

Mitigation of Potential Risks

Liquorland is an experienced operator of over 930 packaged liquor licences around the country and is well recognised for excellent compliance and responsible retailing.

While noting the NSW Police or Council did not object to the application, to accommodate stakeholder concerns, Liquorland offers the following specific measures tailored to mitigate the risk of alcohol related harm, theft and anti-social behaviour and adolescent drinking:

Specific security measures:

1. Reduced trading hours.
2. Coles Liquor will employ a designated security guard between 5pm and 9pm on Friday and Saturday nights (as per condition 2 below). The security guard will also patrol the nearby Coles car park.
3. Security film on external glass.
4. Bright lighting throughout the store.
5. A state of the art alarm system which is monitored off-site.
6. CCTV cameras covering the entire store and development.
7. Coles Liquor has also recently launched a new industry leading incident platform called 'Auror' which connects CCTV throughout its entire store network with the Police to better identify offenders. This has produced outstanding outcomes as it has assisted Coles Liquor and police to identify and significantly reduce theft (with a focus on repeat offenders) and crime in and around licensed premises.
8. Coles Liquor will also provide Security Pendants to team members employed at the store. These are a mobile device that allows team members to alert Police if there is a threatening situation when they are away from the register and cannot access the void log on function.
9. Any risk associated with the granting of the Application will be mitigated by the imposition of appropriate licence conditions and by the Applicant's adherence to the

measures stipulated in its plan of management. For an abundance of caution, the Applicant has proposed conditions “over and above” conditions which would ordinarily be imposed on the grant of a packaged liquor licence, including a designated security guard and reduced trading hours as set out below.

Conditions Proposed

1. The Applicant proposes to offer **significantly reduced trading hours from the original trading hours sought**. The reduced trading hours now sought are:
 - (a) Monday to Saturday: 10:00am to 10:00pm.
 - (b) Sunday: 10:00am to 09:00pm.
2. The Applicant is to employ a security guard from 5pm until close on Friday and Saturday nights. The security guard will regularly patrol the nearby Coles car park.
3. The Applicant will join and be an active participant in the local liquor accord. Despite submissions made at the public meeting, Coles Liquor has 12 stores which are members of the Wollongong Accord.
4. The Applicant agrees to comply with its extensive Coles Liquor "NSW Management Strategies" and "House Policy for the Responsible Service of Alcohol" documents as a licence condition.
5. The Applicant agrees to the Authority's social impact condition.
6. The Applicant agrees to implement and maintain an incident register to record the details of any relevant incident and action taken in response to any such incident.
7. The Applicant agrees to the Authority's CCTV Condition.

Yours faithfully

JDK Legal



Jon Martin

Annexure “A”

The Store will be fitted-out in accordance with the new 'black and white' theme which has been designed to appeal to a more sophisticated clientele, deliver a more relevant, local range and position Liquorland as a local specialist.

Some of the other new design measures adopted to improve the consumer experience include:

The new black and white aesthetic appearance of the Store will continue to be immediately recognisable as a 'Liquorland', easily distinguishable from other liquor stores.



The new design conveys a more distinguished brand than previously and appeals to today's more discerning customer.



The Store will have redesigned signage, such as the 'Beer District' and 'Spirits Trail', allowing consumers to easily identify where their preferred varieties of product are located.



The re-modelled 'Wine Region' signage improves customers' ability to navigate between red and white wine and also varieties and blends.



The Store will include a specific section for local Australian wines to make this store more locally relevant for customers and providing another avenue to market for local producers.



The new design will also include dedicated spaces featuring locally sourced, craft and boutique beer.



The cool room at the Store has been specifically designed to allow easy access and navigation for consumers with trolleys, as it features a wide path and accessible chilled product lines.



To cater for the increasing consumer requirement for online shopping the store will have a clearly signed and designated area for customers who purchase liquor online and wish to collect their products in store.

