



Mr Tony Schwartz
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Dear Mr Schwartz

Application for Packaged Liquor Licence – BWS Warriewood

I am writing to you regarding an application made by your client, Mr Anthony Charles Leybourne Smith on behalf of Woolworths Ltd, which was received by the Independent Liquor and Gaming Authority (**Authority**) on 2 June 2015.

As described in the Authority's Regulatory Delegations Manual, the Authority has delegated to the Licencing Specialist (**Delegate**) the power to grant certain packaged liquor licence applications that fall within a designated risk threshold. This Application falls within the relevant threshold enabling the matter to be determined under delegation.

The Delegate considered the Application on 9 September 2015 and has decided, pursuant to section 45 of the *Liquor Act 2007* to grant the Application. Staff notified the grant of the licence on 15 September 2015.

Under section 36C of the *Gaming and Liquor Administration Act 2007*, the Authority is required to publish statements of reasons with respect to those decisions prescribed by clause 6 of the *Gaming and Liquor Administration Regulation 2008*.

This letter attaches the Delegate's statement of reasons. It has been prepared in the context of a high volume liquor jurisdiction that requires the publication of statement of reasons as soon as practicable.

A record of the licence from the OneGov database specifying all conditions to which the licence is subject has been provided to you in separate correspondence from Authority staff.

Please contact case manager Santina Causa via santina.causa@ilga.nsw.gov.au if you have any advice or enquiries about this letter.

Yours faithfully


Leifani Jauco 1/3/2016
Delegate

STATEMENT OF REASONS

INTRODUCTION

1. On 2 June 2015 the Independent Liquor and Gaming Authority (**Authority**) received an application (**Application**) made by Mr Anthony Smith, Business Manager Licensing for Woolworths Ltd (**Applicant**).
2. The Application seeks the grant of a new packaged liquor licence within the meaning of section 29 of the *Liquor Act 2007*. The Application is made in respect of premises located within Warriewood Square shopping centre at Shop MJ003, 12 Jackson Road, Warriewood, 2102.
3. The proposed licensed trading hours of the application will be 8:00am to 10:00pm Monday to Saturday and 10:00am to 8:00pm Sunday.
4. The Application seeks that the 6 hour closure period required by section 11A of the Act be fixed between 2:00am and 8:00am.
5. As described in the Authority's Regulatory Delegations Manual, the Authority has delegated to the Licencing Specialist (**Delegate**) the power to grant certain packaged liquor licence applications that fall within a designated risk threshold. This Application falls within the relevant threshold enabling the matter to be determined under delegation.

MATERIAL BEFORE THE AUTHORITY

6. **Application Form and Community Impact Statement (CIS) dated 22 May 2015.** The Application seeks to exercise licensed trading hours between 8:00am and 10:00pm Monday to Saturday and 10:00am to 8:00pm Sunday. The Application also seeks that the 6 hour daily closure period, for the purposes of section 11A of the Act, be fixed at between 2:00am and 8:00am.
7. The contentions and submissions made by the Applicant in the CIS document as to the overall social impact of granting the Application are discussed below.
8. **Information relating to the Applicant** including a National Police Certificate (**NPC**) dated 20 February 2015. This document indicates that the Applicant has "no disclosable court outcomes or outstanding matters". Also provided is a copy of the Applicant's Drivers Licence, Medicare Card, and Credit Union Visa card.
9. **Plan of the Premises.** A diagram showing the Premises and the boundary of the proposed licensed area.
10. **Document bundle including "Woolworths Liquor Group Liquor Store House Policy", and "Operational matters; security, harm minimisation and responsible service of alcohol practices adopted at BWS stores in NSW".** These two documents provided by the Applicant address internal policies and procedures maintained by the BWS business regarding the prevention of persons under the age of 18 from purchasing liquor or having liquor purchased for them - primarily by requiring the presentation of

identification (ID) in the form of a current driver or rider licence, a current passport or NSW Photo ID Card from any person who appears to be under the age of 25. These business policies also require refusal of service to any person who appears to be intoxicated; participation in self-exclusion arrangements; ensuring that liquor is not consumed on the Premises nor displayed outside the licensed area; ensuring that all staff involved in the sale and supply of liquor are RSA certified; ensuring that CCTV and other security measures are in place and requiring participation in local liquor accords.

11. **Submission from NSW Police Northern Beaches Local Area Command (LAC), dated 3 July 2015.** Police briefly state that they have “no objection to the application”.
12. **Submission from NSW Transport, Roads & Maritime Services (RMS), dated 13 April 2015.** RMS make no objection to the Application but notes that within Pittwater LGA during 2013 there were 17 alcohol related crashes, resulting in 11 casualties. RMS request that measures to prevent alcohol involvement in road crashes in the Warriewood area should be discussed in the approval process and that the licensee must attend the Local Liquor Accord meetings as well as provide education material focused on drink driving and pedestrian alcohol issues.
13. **Email from the Office of Liquor Gaming and Racing (OLGR), sent 5 August 2015.** This brief email states that OLGR “does not intend to carry out any further assessment of this application at this time”.
14. **OLGR Environment and Venue Assessment Tool (EVAT) reference number LA15/02642 for the suburb of Warriewood, dated 4 August 2015.** This EVAT document identifies the location and venue risk factors for the Premises. The risk of alcohol related assaults and offensive behaviour are assessed as “low”, and the Police assessment is also assessed as having a low risk. The risk ascribe to Council is assessed as “moderate”. The packaged liquor licence type is rated as having a “moderate” risk while other venue specific factors are rated as “low” risk.
15. **Submission from Pittwater Council (Council) dated 8 May 2015.** This letter acknowledges the Applicant’s intent to apply for a liquor licence and provides a copy of the Council’s Policy on Liquor Licencing Applications (**Council Policy**). The Council Policy document sets out the factors that Council considers when determining whether to support an application for a liquor licence. They include the category of liquor licence, whether the proposed licensed premises are located on private or public land and the proposed hours of licensed trading.
16. **McKenzie Group Complying Development Certificate (CDC) number 15/122931-1, dated 30 April 2015.** This CDC records approval of the fitout of the BWS liquor store. The document also addresses, *inter alia*, the regulation of construction, fire safety, maintenance, and amenities.
17. **Publically available Bureaus of Crime Statistics and Research (BOCSAR) crime mapping data for April 2014 to March 2015.** These crimes maps indicate that the Premises are located in a high density hotspot for the concentration of *malicious damage to property* events and near a low density hotspot for the concentration of *domestic assault*.
18. **Crime data sourced from BOCSAR for calendar year 2013 detailing rates of offences for Pittwater LGA compared to NSW as a whole.** This data details rates of *alcohol-related incidents*. It indicates that for the calendar year of 2013:

- the rate of *alcohol-related assault police* was **10** per 100,000 persons compared to NSW as a whole which had **24** per 100,000 persons.
 - the rate of *domestic-violence assault* was **70** per 100,000 persons compared to NSW as a whole which had **145** per 100,000 persons.
 - the rate of *malicious damage to property* was **80** per 100,000 person compared to NSW as a whole which had **122** per 100,000 persons.
 - the rate of *alcohol related non-domestic violence assault* was **140** per 100,000 persons compared to NSW as a whole which had **191** per 100,000 persons.
19. **Authority licensing records.** These records, which are updated regularly and available for purchase from the Office of Liquor Gaming and Racing indicate that there are four (4) existing packaged liquor licenced premises within the suburb of Warriewood. However, two (2) of these are authorised to operate as online only retailers.
20. **Authority license density data.** This data records the liquor licence density in respect of the Pittwater Local Government Area (LGA) compared to the State of NSW as a whole. It indicates that within the Pittwater LGA there are:
- **8.75** club licences per 100,000 persons compared to NSW as a whole which has **20.48** per 100,000 persons;
 - **17.49** full hotel licenses per 100,000 persons compared to NSW as a whole which has **30.36** per 100,000 persons;
 - **22.74** packaged liquor licenses per 100,000 persons compared to NSW which has **32.85** per 100,000 persons.
21. **Socio Economic Index for Areas (SEIFA) data published by the Australian Bureau of Statistics (ABS) in 2011**, indicating that the state suburb of Warriewood falls within the 10th decile on the Index of Relative Socio-economic Advantage and Disadvantage (IRSAD) for all suburbs in NSW. Pittwater LGA also falls within the 10th decile on the IRSAD for all LGAs in NSW (with a ranking of 10 being the most advantaged).

LEGISLATION

22. The power to grant a new liquor licence is provided by section 45 of the Act, which states:

45 Decision of Authority in relation to licence applications

- (1) *The Authority may, after considering an application for a licence and any submissions received by the Authority in relation to the application, grant the licence or refuse to grant the licence. The Authority may determine the application whether or not the Secretary has provided a report in relation to the application.*
- (2) ...
- (3) *The Authority must not grant a licence unless the Authority is satisfied that:*
- (a) *the applicant is a fit and proper person to carry on the business or activity to which the proposed licence relates, and*

- (b) *practices will be in place at the licensed premises as soon as the licence is granted that ensure, as far as reasonably practicable, that liquor is sold, supplied or served responsibly on the premises and that all reasonable steps are taken to prevent intoxication on the premises, and that those practices will remain in place, and*
- (c) *if development consent is required under the Environmental Planning and Assessment Act 1979 (or approval under Part 3A or Part 5.1 of that Act is required) to use the premises for the purposes of the business or activity to which the proposed licence relates – that development consent or approval is in force.*

23. Under section 48(5) of the Act, the Authority *must not* grant a licence, authorisation or approval of a kind prescribed by section 48(2) of the Act unless the Authority is satisfied, having regard to the CIS 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 in question being granted *will not be detrimental* to the local or broader community.

24. Section 48(5) of the Act states:

48 Community impact

- (5) *The Authority must not grant a licence, authorisation or approval to which a relevant application relates unless the Authority is satisfied, after having regard to:*
 - (a) *the community impact statement provided with the application, and*
 - (b) *any other matter the Authority is made aware of during the application process (such as by way of reports or submissions), that the overall social impact of the licence, authorisation or approval being granted will not be detrimental to the well-being of the local or broader community.*

25. An application for a packaged liquor licence is a type of licence prescribed by section 48(2) requiring a CIS and satisfaction of the overall social impact test.

26. In determining the Application, the Delegate also considered relevant provisions of the Act, including the objects and considerations that are prescribed by section 3, which states:

3 Objects of Act

- (1) *The objects of this Act are as follows:*
 - (a) *to regulate and control the sale, supply and consumption of liquor in a way that is consistent with the expectations, needs and aspirations of the community.*
 - (b) *to facilitate the balanced development, in the public interest, of the liquor industry, through a flexible and practical regulatory system with minimal formality and technicality,*
 - (c) *to contribute to the responsible development of related industries such as the live music, entertainment, tourism and hospitality industries.*

- (2) *In order to secure the objects of this Act, each person who exercises functions under this Act (including a licensee) is required to have due regard to the following:*
- (a) *the need to minimise harm associated with misuse and abuse of liquor (including harm arising from violence and other anti-social behaviour),*
 - (b) *the need to encourage responsible attitudes and practices towards the promotion, sale, supply, service and consumption of liquor,*
 - (c) *the need to ensure that the sale, supply and consumption of liquor contributes to, and does not detract from, the amenity of community life.*

APPLICANT CASE ON OVERALL SOCIAL IMPACT

27. In the Applicant's CIS statement dated 22 May 2015, the Applicant contends that there is "an under-provision of licensed premises in Warriewood" and that shoppers at Warriewood Square shopping centre are "entitled to a modern, well-stocked BWS branded bottleshop facility".
28. The Applicant contends that, as there are two (2) existing BWS stores in the Pittwater LGA and the Premises "will not result in a change of existing consumer behaviour as to the type or quantity of alcohol to be consumed".
29. The Applicant notes that the proposed licensed business to be conducted on the Premises will not trade beyond 10:00pm and that the licensed business will not permit consumption of alcohol on the Premises. The Applicant contends that the new licensed business is "unlikely to cause the same amenity type concerns in the neighbourhood of the new store when compared with those that may arise from licensed venues where the consumption of alcohol occurs on the premises and that trade late into the evening".
30. The Applicant submits that the location of licensed premises within shopping environments is "neither unusual nor inappropriate and is in fact encouraged by established town planning principles and practices, and by Council zoning provisions". The Applicant contends that residents expect shopping centres to "offer a full range of services and facilities".
31. The Applicant submits that the SEIFA indexes indicate that the suburb of Warriewood and the Pittwater LGA are "advantaged communities". The Applicant has provided a table indicating the SEIFA data for the Pittwater LGA and the suburb of Warriewood. Both Pittwater LGA and the suburb of Warriewood are indicated as having an IRSAD score of 10.
32. With regard to any potentially sensitive facilities located near the Premises (a matter that the CIS form requires an applicant to address) the Applicant contends that the Premises "is unlikely to cause an adverse impact" upon those facilities by reason of the following factors:
- The licensed business "will not have any direct street visibility or access".
 - The licensed business "will be modern, well illuminated, subject to a sophisticated surveillance system, and have proper, demonstrated and proven to work harm minimisation and responsible service of alcohol policies and procedures in place".
 - There are "no services, facilities, businesses or organisation in this location that are frequented by "at risk" persons or groups for alcohol related harm".

33. The Applicant submits that the BOCSAR data “confirms that alcohol related crime in Warriewood is low” and that there is “no evidence that the new store will exacerbate existing levels of alcohol related crime”.
34. The Applicant provides BOCSAR crime data for the Pittwater LGA from the calendar year of 2014. This data records the rate of instances crime per 100,000 persons compared to NSW as a whole, as follows:
 - *Alcohol related domestic violence*: 71.9 incidents per 100,000 persons compared to NSW as whole which had 132.9 incidents.
 - *Alcohol related non-domestic violence*: 165 incidents per 100,000 persons in Pittwater LGA compared to NSW as whole which had 158.2 incidents.
 - *Alcohol related disorderly conduct*: 101.3 incidents per 100,000 persons in Pittwater LGA compared to NSW as whole which had 99.8 incidents.
 - *Alcohol related assault police*: 8.2 incidents per 100,000 persons in Pittwater LGA compared to NSW as whole which had 19.7 incidents.
35. The Applicant further contends that the BOCSAR crime statistics for the calendar year of 2014 show that in the suburb of Warriewood the rates of *alcohol related domestic violence assault* were 60.5 incidents per 100,000 persons compared to NSW as a whole which had 132.9. With regard to *alcohol related non-domestic violence assault* the rate of incidents per 100,000 persons was 75.6 compared to NSW as a whole which had 158.2.
36. The Applicant submits that while submissions were received from community stakeholders, including neighbouring premises, special interest groups, NSW Police and the Pittwater Council, there were no submissions that objected to the Application.
37. With regard to prevailing alcohol related harm in the communities, the Applicant has supplied statistics from the NSW Department of Health for the broader community of Pittwater LGA indicating that rate of alcohol-related hospitalisation rates are not statistically different than the average rate for NSW as a whole. Alcohol-related death rates are recorded as slightly lower than the average for NSW as a whole.
38. With regard to the presence of “at risk” groups in the relevant communities, the Applicant contends that for harm to arise to any “at risk” group “their level of alcohol consumption would have to increase as a result of this Application” and “there is no evidence that would occur”.
39. The Applicant submits a table of information extracted from 2011 ABS Census data indicating that all of the usual “at risk” groups within the Pittwater LGA (that is, sociodemographic groups associated with a relatively greater exposure to adverse alcohol related social impacts). The table includes data on the proportion of persons in the following groups:
 - Indigenous persons (NSW 2.5%, Pittwater LGA 0.4%, the suburb of Warriewood 0.5%).
 - Young persons, 15-24 years of age (NSW 12.9%, Pittwater LGA 11.1%, the suburb of Warriewood 9.6%).
 - Older Australians, 65+ years of age (NSW 14.7%, Pittwater LGA 17%, the suburb of Warriewood 14.3%)
 - Persons with disabilities (NSW 4.89%, Pittwater LGA 3.2%, the suburb of Warriewood 3.6%)

- Non English speaking background persons (NSW 72.5%, Pittwater LGA 88.7%, the suburb of Warriewood 85.3%). The Applicant contends that with regard to this statistic the percentage figure represent those in the area who only speak English.
 - Unemployed persons (NSW 5.9%, Pittwater LGA 3.5%, the suburb of Warriewood 2.8%)
 - Labourers (NSW 8.7%, Pittwater LGA 5.1%, the suburb of Warriewood 5.1%)
 - One parent families (NSW 16.3%, Pittwater LGA 12%, the suburb of Warriewood 14.1%)
 - Renters (NSW 30.1%, Pittwater LGA 18.8%, the suburb of Warriewood 16.6%)
40. The Applicant submits that all of these “at risk” groups were represented in the community of the Pittwater LGA to a lesser degree than for New South Wales as a whole. save for the category of Older Australians who accounted for 17% of the Pittwater LGA compared 14.7% for New South Wales as a whole.
41. The Applicant submits that within the state suburb of Pittwater all of the “at risk groups” identified in this table are represented to a lesser degree than for New South Wales as a whole.
42. The Applicant contends that granting the Application will provide the following benefits to the suburb of Warriewood and the Pittwater LGA
- The introduction of the licensed business will “provide employment opportunities”.
 - The licensed business will “meet a public expectation” that its liquor products are available “as part of a customer’s daily or weekly shopping requirement”.
 - The licensed business will provide the communities with a “well stocked, state of the art, competitively priced bottle shop” that is “conveniently placed alongside the Supermarket”.

REASONS

43. The Delegate is satisfied, for the purposes of section 40 of the Act that the Application and CIS material provided by the Applicant establishes that the Application has been validly made and relevant consultation and advertising requirement of the legislation were observed.
44. The Delegate is satisfied, for the purposes of section 45(3)(a) of the Act, that the Applicant is a fit and proper person from a probity perspective and the Delegate notes that no probity concerns have been raised in submission form the other stakeholders, particularly NSW Police and OLGR, in this regard.
45. The Delegate is satisfied that that the Applicant is experienced in operating a retail packaged liquor business and that the Applicant’s policy and planning documents “Woolworths Liquor Group Liquor Store House Policy”, and “Operational matters; security, harm minimisation and responsible service of alcohol practices adopted at BWS stores in NSW” disclose that detailed policies and a comprehensive risk mitigation regime has been devised by the Applicant and will be in place when the licensed business commences operation on the Premises. The Delegate notes that there is no adverse information before the Delegate as to the Applicant’s company’s fitness in response to consultation on this Application with relevant law enforcement agencies including Police and OLGR.

46. The Delegate is satisfied, for the purposes of section 45(3)(b), that responsible service practices will be in place with the commencement of licensed trading, on the basis of the detailed business planning material provided with the Application including the "Woolworths Liquor Group Liquor Store House Policy", and "Operational matters; security, harm minimisation and responsible service of alcohol practices adopted at BWS stores in NSW" submissions provided by the Applicant and noting an absence of adverse submission from OLGR or from Police with regard to the Applicant in this regard.
47. The Delegate is satisfied, for the purpose of section 45(3)(c) of the Act, that the required development consent is in place for conduct of a retail package liquor business on the Premises. This finding is made on the basis of the CDC issued by the McKenzie Group (reference: 15/122931-1) dated 30 April 2015.

Local and Broader Community

48. With regard to the overall social impact test proscribed by section 48(5) of the Act, the Delegate is satisfied that the local community comprises the state suburb of Warriewood and the broader community comprises the Pittwater LGA.

Overall Social Impact

49. Applying the overall social impact test requires a degree of speculation, albeit speculation informed by the particular proposal and the prevailing circumstances in the relevant local and broader community.

Positive Benefits

50. The Delegate accepts the Applicant's contention that granting the Application will provide some additional measure of convenience to those members of the local and broader community who wish to purchase liquor for consumption off the Premises at the same time as buying their groceries and other items from the Warriewood Square shopping centre.
51. The Delegate accepts as generally credible the Applicant's submission that granting the Application will, to some extent, provide employment opportunities within the Premises.
52. However, no commitment has been made as to the number of staff that will be employed and the communities from which staff of this business will actually be recruited, which diminishes the weight that can be given to his particular community benefit.
53. The Delegate also accepts as credible that the Application would meet the expectations of consumers for a packaged liquor store within a shopping centre and that the presence of this liquor store would strengthen the viability of the shopping centre as patrons of the shopping centre would have the convenience of being able to purchase liquor in addition to their regular groceries without having to make an additional trip.
54. The Delegate is satisfied that granting the Application in the circumstances proposed by the Applicant will advance, to some modest extent, the "needs desires and expectations" of the local and broader community who are likely to shop at this shopping centre which is an object of section 3(1)(a) of the Act. The Delegate is satisfied that granting the Application will also facilitate, to a modest extent, the balanced development in the public interest of the liquor industry which is an object of section 3(1)(b) of the Act.

55. The Delegate is satisfied that by granting the Application, the enhanced convenience, choice and employment will be consistent with promoting the "expectations, needs and aspirations" of the local and broader community within the meaning of section 3(1)(a) of the Act.
56. The Delegate accepts that there may be some benefits by way of increased competition and variety for the local supply of retail liquor particularly given that the density of packaged liquor (22.74 per 100,000 persons), club (8.75 per 100,000 persons) and full hotel (17.49 per 100,000 persons) licenses is significantly lower than the licence density rates across the State which has rates of 32.85 packaged liquor licences per 100,000 persons, 20.48 club licenses per 100,000 persons, and 30.36 full hotel licenses per 100,000 persons.

Negative Impacts

57. The Delegate accepts that over time there will likely be some contribution from the liquor sold at this new licensed business to alcohol related crime, disturbance or other adverse impacts on amenity in the local or broader community from a minority of customers who abuse packaged liquor purchased from the Premises.
58. A minority of patrons of the new business may also potentially contribute to a variety of other likely adverse impacts upon local amenity associated with the abuse of packaged liquor, such as including drinking in public, and underage drinking before attending licensed premises or alcohol related litter.
59. However, on the material before the Delegate, the scope for concern as to the contribution that this business may make to such impacts is not considered to be pronounced - in light of an absence of any submissions indicating or specifying prevailing sensitivities as to localised alcohol related crime or amenity impacts from local residents, local business owners, Police, OLGR, or Council.
60. The Delegate is satisfied that while in 2014 BOCSAR crime data indicates that rates of *alcohol related non-domestic assault* appear to be slightly higher for the Pittwater LGA (165 per 100,000 persons) than NSW as whole (158.2 per 100,000 persons) although this category may be fuelled by alcohol sold from on premises and off premises outlets and it has not translated into any concern from law enforcement in response to this Application.
61. Other than some moderate concern arising from the rate of *non-domestic assault* there is little cause for concern arising from the prevailing rates of crime recorded within the Pittwater LGA when compared with NSW State averages.
62. The Delegate is satisfied that SEIFA data for the suburb of Warriewood as well as the broader community indicate relative socio-economic advantage, which is a further, albeit more general factor in support of granting the Application. SEIFA data indicates that the communities likely to be serviced or impacted by the operation by this business over time do not exhibit indicia of particular vulnerability to adverse social impacts associated with the abuse of alcohol.
63. The Delegate notes the absence of any adverse submissions from the community in response to the Application raising negative submissions pertaining to social impact.
64. The hours sought by the Applicant are extensive, trading from 8:00 am to the maximum evening time permitted in New South Wales (10:00 pm) Monday to Saturday and from

10:00am to 8:00pm Sunday. This is an adverse incident of the Application that objectively increases the potential for liquor sold from this business to contribute to adverse outcomes in the local or broader community.

65. The size of the Premises is also of concern. As is identified in the CIS document the Premises will occupy approximately 145 square meters. This is not a small scale operation and a large premises is harder to monitor for security purposes and is capable of housing a substantial amount of liquor.
66. The comprehensive harm minimisation measures above and beyond the requirements of legislation that are outlined in the documents "Woolworths Liquor Group Liquor Store House Policy", and "Operational matters; security, harm minimisation and responsible service of alcohol practices adopted at BWS stores in NSW" (including the CCTV and security facilities at the store) have also been taken into account as harm minimisation factors, along with the passive surveillance and relatively greater security arising from the location of the Premises within a shopping centre, that has not been identified as an otherwise problematic location for alcohol related anti-social conduct.

CONCLUSION

67. Considering together the positive benefits found in this case and those factors which objectively constrain or reduce the extent of likely negative impacts that may otherwise arise from the sale of liquor from this proposed new business, the Delegate is satisfied that the overall social impact of granting this Application for a packaged liquor licence will not be detrimental to the well-being of the local or broader community.
68. In making this decision the Delegate has had regard to all of the statutory objects of section 3(1) and has taken into account all of the considerations prescribed by section 3(2).
69. The Delegate has had regard to the need to minimise harm associated with the misuse and abuse of liquor within the meaning of section 3(2)(a) and the need to ensure that the sale, supply and consumption of liquor contributes to, and does not detract from the amenity of community life within the meaning of section 3(2)(c).
70. In making this decision, the Delegate has determined the 6-hour closure period under section 11A(3) of the Act as the period from 2am to 8am


Leijani Jauco
Delegate

DATED: 1/3/2016