



Ms Georgina Phelps
c/o Bradley Allen Love Lawyers
Level 9, 40 Marcus Clarke St
Canberra ACT 2601

4 October 2016

Dear Ms Phelps,

APPLICATION NO: 1-4463856698
APPLICATION FOR: New Club Licence
PROPOSED TRADING HOURS: Monday to Sunday 10:00AM – 10:00PM

APPLICANT: Queanbeyan Sports and Community Club
PROPOSED LICENSED PREMISES NAME: Queanbeyan Sports and Community Club

PREMISES LOCATION: 97 Campbell St, Queanbeyan NSW 2620
(Premises)

ISSUE: Whether to grant or refuse an application for a new club licence

LEGISLATION Sections 3, 18, 19, 20, 40, 45, 48 *Liquor Act 2007*.

**INDEPENDENT LIQUOR AND GAMING AUTHORITY DECISION - APPLICATION FOR
NEW REGISTERED CLUB LICENCE – QUEANBEYAN SPORTS AND COMMUNITY
CLUB**

The Independent Liquor and Gaming Authority considered the Application at its meeting on 14 September 2016 and pursuant to section 45 of the *Liquor Act 2007* (Act), has decided to **grant** the Application number 1-4463856698 subject to the following conditions:

1. Trading Hours
Monday to Thursday 11:00AM – 10:00PM
Friday to Saturday 10:00AM – 10:00PM
Sunday 11:00AM – 10:00PM
2. Section 11A of the *Liquor Act 2007* applies to this licence. Liquor must not be sold by retail on the licensed premises for a continuous period of 6 hours between 4:00 AM and 10:00 AM during each consecutive period of 24 hours.

3. Consumption on premises December 31st (without limiting the operation of any extended trading authorisation) - from the start of the standard trading period for that day until 2:00AM on the next succeeding day.
4. The licence cannot be exercised unless and until the Independent Liquor & Gaming Authority has approved the proposed club amalgamation with the Queanbeyan Bowling Club LIQC300242269.
5. The licensee or its representative must join and be an active participant in the local liquor accord.
6. The business authorised by this licence must not operate with a greater overall level of social impact on the well being of the local and broader community than what could be reasonably expected from the information contained in the Community Impact Statement, application and other information submitted in the process of obtaining this licence.

If you have any enquiries about this letter, please contact the case manager via email to santina.causa@ilga.nsw.gov.au

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Philip Crawford', with a stylized flourish at the end.

Philip Crawford
Chairperson

For and on behalf of the **Independent Liquor & Gaming Authority**

STATEMENT OF REASONS

Material Before The Authority

1. The following is a summary only of the considerable amount of material and submissions before the Independent Liquor and Gaming Authority (Authority) for the purposes of publishing a statement of reasons, as soon as practicable, in a high volume jurisdiction.
2. In making this decision, the Authority has considered the application filed on 5 May 2016 (Application), the accompanying community impact statement (CIS) and all submissions received in relation to the Application. As foreshadowed in Authority Guideline 6, the Authority has also had regard to relevant liquor licensing records and licence density data maintained by Liquor and Gaming NSW (LGNSW), Bureau of Crime Statistics and Research (BOCSAR) crime data and Australian Bureau of Statistics (ABS) socio-demographic data pertaining to the local and broader communities, sourced by licensing staff from publicly available sources. That material is listed and in some cases briefly summarised in the Schedule.
3. This Application is made in the context of an existing club, the Queanbeyan Bowling Club (QBC) which has been trading for 82 years having encountered financial difficulties and negotiating an amalgamation with the Queanbeyan Sports and Community Club (QSCC) to ensure a viable future. In order to amalgamate in accordance with the *Registered Clubs Act 1976*, both clubs are required to be registered, which means they must both hold a club licence prior to amalgamation.

Summary of Further Submissions

4. Email submission from Senior Constable Richard Pearce, Monaro Licensing Coordinator of the Monaro Local Area Command (LAC) of NSW Police (Police) dated 14 June 2016. Police advise that they have no objection to the Application or the related amalgamation of QBC and QSCC. Police submit that the existing registered club licence LIQC300242269 (for QBC) should be surrendered upon grant of a new club licence to the QSCC and that all existing licence conditions on the QBC licence be transferred to the QSCC licence upon amalgamation.
5. Submission from the Applicant's solicitor to licensing staff dated 29 July 2016 attaching a copy of the certificate of advertising and agreeing with the rationale for the Police submission but noting that new licence, once granted, would *not* continue but instead the existing club licence (held by QBC) would continue to be held by the amalgamated club. The Applicant also advises that none of the licence conditions proposed by licensing staff in an email dated 26 July 2016 are of any concern to the Applicant. They concern the six-hour closure period pursuant to section 11A of the Act, the level of social impact from operating the business, a requirement to join the Local Liquor Accord and restriction on exercising the licence until the Authority has approved the amalgamation].

Legislative Framework

6. The legal requirements for the making of a valid application for a liquor licence are provided by section 40 of the *Liquor Act 2007* and the *Liquor Regulations 2008* (Liquor Regulations). The power to grant an application for a new liquor licence is provided by section 45 of the Act.
7. In the case of a registered club licence section 19 of the Act requires that the club meet the requirements of section 10(1) of the *Registered Clubs Act 1976* among other requirements specified in Division 3 of Part 3 of the Act.
8. Any person exercising functions under the Act must also have regard to the objects and considerations set out in section 3 of the Act which states:
 - (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.*
9. Section 48(5) of the Act requires the Authority, in certain circumstances, to consider a CIS (as well as any other matter the Authority is made aware of during the application process) in order to ensure that the overall impact of the licence, authorisation or approval being considered will not be detrimental to the local or broader community.
10. An application for a new club licence is a “relevant application” within the meaning of section 48(2) of the Act for which a CIS is required.
11. Section 48(5) of the Act requires that the Authority must not grant the Application unless satisfied that “the overall social impact of the licence, authorisation or approval being granted will not be detrimental to the well-being of the local or broader community”.
12. For the purposes of this decision and consistent with its longstanding practice and its position in *Guideline 6*, the Authority is satisfied that the relevant “local community” is the community within the State suburb of Queanbeyan while the “broader community” comprises the responsible Local Government Area (LGA), the Queanbeyan LGA.

Analysis of Relevant Facts

13. The Authority is satisfied, on the basis of the Application and CIS material before the Authority that, for the purposes of section 40 of the Act, the Application has been validly made and minimum procedural requirements with regard to the Application, CIS and community consultation have been satisfied.
14. For the purposes of section 19 of the Act, the Authority is satisfied, on the basis of the information provided about the new club in the Application, CIS and Applicant submissions that the proposed club will meet the requirements of section 10(1) of the *Registered Clubs Act 1976*.
15. The Authority is satisfied, for the purposes of section 45(3)(a) of the Act, that the Applicant is a fit and proper person to carry on the business of a club licensed venue as proposed in the Application material. The Authority notes that no probity issues were raised with regard to the Applicant company following consultation with law enforcement agencies including Police.
16. The Authority is satisfied, for the purposes of section 45(3)(b) of the Act, that responsible service of alcohol practices will be in place upon the commencement of licensed trading. This finding is made on the basis of the *Responsible Service of Alcohol House Policy* and submissions provided by the Applicant.
17. The Authority is satisfied, for the purposes of section 45(3)(c) of the Act, that the required development consent for the proposed use of the Premises is in force, on the basis of the Local Consent Authority Notice (attached to the CIS dated 5 May 2016) signed by Mr Michael Thompson on behalf of Queanbeyan City Council (Council) on 13 April 2016 which refers to Development Application (DA) 93-2006.

Social Impact – Positive Benefits

18. The Authority is satisfied, on the basis of the CIS, that the Applicant has demonstrated that granting the licence will have a positive impact on the local community by providing an opportunity to improve the existing club facilities.
19. The Authority is satisfied on the basis of the CIS and the nature of responses and the very limited local opposition received in response to that consultation that the Applicant has established that granting the Application will be consistent with the “expectations, needs and aspirations of the community” in respect of the local community of Queanbeyan, being an object of section 3(1)(a). The one adverse response from a local resident received during the CIS consultation process is addressed below.
20. The Authority is satisfied on the basis of the Application material, CIS and additional submissions supplied by the Applicant that granting this Application will support all sporting community groups not only bowls and will become a hub for people to meet, dine, support and play and continue to participate in the liquor and gaming services provided on the Premises in a registered club environment. In this sense, the Authority is satisfied that licensing the proposed business may also contribute to the development of the liquor industry in the local community for the purposes of section 3(1)(b) of the Act.

Social Impact – Negative Impacts

21. Having reviewed all the material, the Authority is satisfied that over time there will likely be some contribution from the liquor sold at the licensed business to alcohol related crime, disturbance or impact on amenity from a minority of customers who abuse liquor purchased from the Premises.
22. The reasonably extensive trading hours sought by the Applicant and substantial scale are factors that objectively increase the scope of this business to contribute, along with other licensed premises, to prevailing adverse social impacts. However, as discussed below, the broader community performs relatively well by comparison to New South Wales as a whole on several indicia.
23. The Authority is satisfied on the basis of the licence density data available from LGNSW that prevailing licence density is not an issue in the broader community of the Queanbeyan LGA. The Authority notes that upon granting this Application, the Applicant intends to amalgamate with the QBC and upon completion of the amalgamation will apply to have this licence suspended indefinitely as the Applicant intends to operate the Premises subject to the existing licence and within the existing premises and subject to the same trading hours and patron limits. The Authority notes that in accordance with section 17AB of the *Registered Clubs Act 1976* in order to be eligible to amalgamate, both the QSCC and QBC must both hold registered club licences and this forms the basis of the reason why the Applicant is applying for this licence. On this basis, the Authority is satisfied that granting this licence and upon completion of the Amalgamation there will not be any increase in the number of operational club licences in Queanbeyan. Licence density per se is not a significant adverse factor on the information before the Authority.
24. The Authority notes that there is some cause for concern arising from the BOCSAR Crime Maps for the period between April 2015 to March 2016 which indicate that the Premises is located *within a low density hotspot* for incidents of *domestic assault* and *within a high density hotspot* for incidents of *malicious damage to property*.
25. However, the Authority is satisfied that the Queanbeyan LGA performs relatively well in so far as alcohol related crime is concerned, on the basis of the BOCSAR *Report on Crime by LGA and Alcohol Related Status* for the calendar year ending 2013 which indicates that the Queanbeyan LGA has lower rates for incidents of *domestic violence related assault, non-domestic violence related assault, offensive conduct* and *assault police* per 100,000 persons compared to NSW as a whole. The Authority notes that this data also indicates that the rate of *malicious damage to property* incidents in the Queanbeyan LGA is above the rate per 100,000 persons for the State of NSW.
26. The Authority is also satisfied on the basis of the Socio-Economic Indexes for Area (SEIFA) data from ABS that the broader community of Queanbeyan LGA is on the whole very advantaged and the state suburb of Queanbeyan is mildly advantage in socio-economic terms on the Index of relative Socio-Economic Advantage and Disadvantage compared to other state suburbs and LGAs in NSW.
27. The Authority notes the generally credible concerns raised by a local resident during the CIS consultation regarding his concerns that granting the Application will result in

extra vehicle noise, speed of vehicles entering and exiting the Premises, delivery vehicles, obscene loud language heard from the patrons when leaving the Premises and sound control and noise minimisation on the Premises.

28. A significant portion of these concerns are planning related and have been considered by Council during the assessment of the DA that was granted and is currently in place for the Premises. While the Authority accepts the resident's claim that a past incident of damage occurred, it appears from the submission to be an isolated occurrence.
29. The Authority accepts that patrons will provide a potential source of disturbance but notes that the hours sought do not extend beyond standard trading hours, reducing the scope for undue disturbance. The Authority is satisfied, on the basis of the CIS and additional submissions that the Applicant will put in place measures to minimise impacts from patrons and noise through the use of PA announcements, security on site, external and internal signage and CCTV to monitor the car park and exits. The Authority is further satisfied on the basis of the CIS that any future construction or improvements would be subject to the relevant planning controls with potential noise to be considered as part of this process.
30. The Authority is satisfied on the basis of the House Policy provided with the Application that various harm minimisation measures have been addresses by the Applicant in order to minimise the negative impact this business will have on the community. The Authority gives weight to the licensed hours sought by the Applicant, which shall be less extensive than the standard hours permitted by the Act with trading hours ending no later than 10:00 pm on any evening. This will objectively reduce the scope for the venue to give rise to undue disturbance to the quiet and good order of the neighbourhood.
31. The Authority is satisfied, on the basis of the CIS and accompanying documents supplied by the Applicant that it is in the public interest for the Authority to approve the reduced minimum membership requirement from 100 to 30 under section 12(b)(ii) of the *Registered Clubs Act 1976*.

Conclusion

32. The Authority is satisfied that procedural fairness was afforded to the Applicant and interested parties regarding the decision whether or not to grant the Application, as all of those required to be notified of the Application were provided with the opportunity to make written submissions and all submissions received were considered and helped inform this decision. The interested parties include NSW Police, the Licensee, Council, Roads and Maritime Services (RMS), neighbouring occupiers, NSW Health and Family and Community Services (FACS) and all other parties required to be consulted under the legislation.
33. Having considered together the positive benefits and negative impacts that the Authority are satisfied are likely to flow from granting the Application, the Authority is satisfied for the purposes of section 48(5) of the Act that the overall social impact of granting this licence would not be detrimental to the well-being of these local and broader communities.

34. The Application is granted pursuant to section 45 of the Act.
35. In making this decision the Authority has had regard to all of the statutory objects prescribed by section 3(1) of the Act and all of the considerations to which it must have regard under section 3(2) – including (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, and (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.

Decision Date: 14 September 2016



Philip Crawford
Chairperson

Important Information:

In accordance with section 13A of the *Gaming and Liquor Administration Act 2007* a relevant person (the Applicant or a person who was required to be notified of the prescribed Application and who made a submission to the Authority or the Secretary in respect of the prescribed Application) who is aggrieved by this decision may apply to NCAT for an administrative review under the *Administrative Decisions Review Act 1997*.

An application to NCAT must be made within 28 days of notice of this decision being published in the liquor and gaming website

<https://www.liquorandgaming.justice.nsw.gov.au/Pages/ilga/decisions-of-interest/decisions-of-interest.aspx> and be accompanied by the fee prescribed by the regulations.

For more information please contact the NCAT Registry at Level 10 John Maddison Tower, 86-90 Goulburn Street Sydney. The NCAT website is at <http://www.ncat.nsw.gov.au/>

SCHEDULE

Material Before The Authority

1. Application Form lodged on 5 May 2016.
2. Copies of stakeholder notices notifying the Application to various stakeholders.
3. CIS document and supporting material lodged on 5 May 2016. Briefly, the Applicant makes the following contentions on overall social impact:
 - (a) The Application is being made to facilitate an amalgamation between the Applicant and the existing QBC;
 - (b) Granting this licence will provide an opportunity to improve the existing QBC club facilities;
 - (c) If the Application is granted and the amalgamation proceeds, the Applicant will then apply to suspend the new club licence indefinitely meaning that the Premises will continue to operate under the existing licence, including within the existing premises and subject to the same trading hours and patron limits;
 - (d) There will be no additional impacts from the operation of the Premises and no increase in the number of operational club licences in Queanbeyan;
 - (e) Any changes to the nature or proposed operation of the Premises would be the subject of further applications and considered at that time;
 - (f) The preliminary consultation process did not reveal any material impacts or concerns about the Application or amalgamation;
 - (g) Council did not have any objection to the grant of a club licence and no other entities responded, indicating that they also did not have any concerns about the Application;
 - (h) One community objection was raised and the Applicant has provided a written response covering each of the issues that were raised. The Applicant contends that it will reduce the likelihood of similar issues arising in the future by managing the club in a way that is responsive to the requirements and expectations of the local community. The Applicant contends that it is proposing to obtain quotes for the necessary repair work to the fence and will discuss the matter with the objector;
 - (i) It is not seeking approval to increase the maximum number of patrons currently permitted on the Premises;
 - (j) Granting the licence will not result in additional traffic impacts as patron numbers are expected to remain the same and no concerns were raised by RMS, Council or any other entity as to the likely impacts of granting the club licence;
 - (k) The construction of alfresco dining areas and other improvements will be considered further after the Application is granted and the amalgamation is complete;

- (l) The potential noise impact of any proposed improvements would also be considered as part of this process.
4. Letter from the Applicant's solicitor dated 2 November 2015 (attached to the CIS dated 5 May 2016) distributed to neighbouring premises with a copy of the notice of intention to apply for a liquor licence.
 5. Australian Securities and Investments Commission (ASIC) current organisation extract for QUEANBEYAN SPORTS & COMMUNITY CLUB LIMITED as at 5 April 2016 (attached to the CIS dated 5 May 2016).
 6. *Responsible Service of Alcohol House Policy* (undated) attached to the CIS dated 5 May 2016.
 7. Club Services Management Agreement dated 2015 attached to the CIS dated 5 May 2016.
 8. Statutory Declaration of Mr Anthony David Hill declared at Canberra on 5 April 2016, attached to the CIS dated 5 May 2016.
 9. QSCC Constitution as amended by Special Resolution dated 9 March 2016 attached to the CIS dated 5 May 2016.
 10. A two-page document (attached to the CIS dated 5 May 2016) discussing how the QSCC as the Applicant for the licence Application has satisfied sections 10 and 12 of the *Registered Clubs Act 1976*.
 11. Details of the 31 members listed on the QSCC Members Register, attached to the CIS dated 5 May 2016.
 12. Submission from Council dated 15 January 2016, attached to the CIS dated 5 May 2016. In this one page submission, Council advises that it has no objection to the Application subject to: the amalgamated club continuing to trade within the existing trading hours specified in the Application; the surrendering of the new licence once the two clubs have amalgamated (so that there is no increase in the number of operational licences in Queanbeyan); and any approvals required under the *Environmental Planning and Assessment Act 1979* for refurbishment of building works being obtained prior to the commencement of any works.
 13. Local Consent Authority Notice (attached to the CIS dated 5 May 2016) signed by Mr Michael Thompson on behalf of Council on 13 April 2016. This notice certifies that Council received the notice on 7 April 2016 and that DA 93-2006 is in place.
 14. Submission from local resident of George Street, Queanbeyan (name not available) dated 20 November 2015 (attached to the CIS dated 5 May 2016). In this two-page letter, the writer raises concerns about: damage to the boundary fence which was caused by patrons of the QBC; the ability to find the number of patrons permitted at the Premises; extra vehicle noise and speed of vehicles coming and going from the QBC; delivery vehicles; drawing patrons attention to the need to consider nearby residents when vacating the Premises; obscene loud language heard from patrons when leaving the Premises; and sound control and noise minimisation included in future repairs and upgrades.

15. Letter from the Applicant to the resident of George Street, Queanbeyan (name not available) dated 29 February 2016 (attached to the CIS dated 5 May 2016). The Applicant contends that: the QBC has been established and trading for the past 82 years being a major part of the Queanbeyan communities fabric and history; the QBC recently went through tough financial times and after 18 months of negotiating, is in the process of amalgamating with QSCC; and it is believed that this amalgamation will progress the QBC forward and support all sporting and community groups (not only bowls) as we will be striving to become the community club and hub for people to meet, dine, support and play.
16. In this two-page letter the Applicant responds to the submission by making the following key contentions: the QBC has a current capacity of 600 people; the QBC has a loading dock on Campbell Street and does not generally use George Street, with our neighbours appearing to use our site for their deliveries; the QBC has a 24 hour licence although our trading hours and current trade does not require alterations to our current trading hours stated; the QBC endeavours for all guests to leave our site quietly through the use of internal signage, PA announcements, security, and external signage; CCTV is used as an extra means to monitor the car park and exits; the QBC is very proactive in regards to anti-social behaviour; the QBC will inspect all fencing, appraise repairs and the maintenance required; all future works would follow all legislative, statutory development and building requirements pertaining to any structure, designed to maintain noise to permitted levels under the Council and Local Environment Plan (LEP) guidelines; and the QBC is now under new management, operating under very professional industry standards and has an open door policy.
17. Letter from the Applicant dated 5 April 2016 (which enclosed the Application and CIS material). In this letter the Applicant contends that: the QSCC has incorporated for the sole purpose of facilitating an amalgamation with the QBC and in order to do this, QSCC had to satisfy the criteria in section 10 and 12 of the *Registered Clubs Act 1976*; the QSCC became the manager of QBC under the Management Contract dated 23 October 2015 and QSCC has been managing QBC successfully since this time; in the event that the Application is granted QSCC requests that the club licence granted in the Application is suspended with a view to being cancelled once a successful amalgamation proceeds with QBC; and it is the intention of QSCC that it would only operate under the transferred licence of QBC pursuant to section 60 of the Act.
18. In addition to the Application, CIS and accompanying attachments the Applicant has attached the following documents to this letter:
 - (a) Email from licensing staff dated 23 February 2016 indicating that no separate application was required for a request for a reduction in the number of minimum ordinary members from 100 to 30.
 - (b) Letter from the (then) Office of Liquor, Gaming and Racing (now) LGNSW sent via email dated 7 September 2015 regarding the Assistant Executive Director Decision Letter to Mr Gumbleton on the proposed loan and management contracts.

- (c) Email from Micheil Brodei (former Chief Executive of the Authority) dated 27 March 2015 confirming that the Authority considered the draft papers to the proposal and while reserving any decision for formal application were of the view that there were no identified legal impediments to the Authority dealing with the Application, that the cross border relationship would not prevent the Authority from considering a proposed merge between entities and that the Authority was in principle satisfied that the tests for a registered club could be met by the QSCC.
19. Onegov licence details for QBC as at 20 July 2016.
 20. Plan or diagram of the licensed area of the QBC.
 21. Aerial photograph of the QBC.
 22. Google geographical map depicting the location of the Premises.
 23. BOCSAR Crime Maps based upon data from April 2015 to March 2016 detailing hotspots for the concentration of offences near the location of the Premises which is publically available on the BOCSAR website. This data indicates that the Premises:
 - (a) Is located *within a low density hotspot* for incidents of *domestic assault*
 - (b) Is *not* located *within any hotspot* for incidents of *non-domestic assault*
 - (c) Is located *within a high density hotspot* for incidents of *malicious damage to property*
 24. Liquor licensing records from LGNSW indicating that the suburb of Queanbeyan already has 5 registered club licences, 4 full hotel licences and 6 packaged liquor licences.
 25. Liquor licence density data from LGNSW indicating that the Queanbeyan LGA as a whole recorded:
 - (a) A rate of **13.16** *registered club licences* per 100,000 persons, which is well below the NSW state wide rate of **20.48**.
 - (b) A rate of **34.22** *packaged liquor licences* per 100,000 persons, which is higher than the NSW state wide rate of **32.85**.
 - (c) A rate of **26.32** *full hotel licences* per 100,000 persons, which is below the NSW state wide rate of **30.36**.
 26. Report on *Crime by LGA and Alcohol Related Status* obtained from published BOCSAR sources for calendar year 2013. This data indicates that:
 - (a) The rate of *domestic violence related assault* incidents recorded by reporting Police as *alcohol related* across the Queanbeyan LGA was **129** per 100,000 persons, below the New South Wales rate of **145** per 100,000 persons.
 - (b) The rate of *non-domestic violence related assault* incidents flagged by reporting Police as *alcohol related* in the Queanbeyan LGA for 2013 was **153**, below the State wide rate of **191**.

- (c) The rate of *offensive conduct* offences flagged by reporting Police as *alcohol related* across this LGA was **53** per 100,000 persons, below the State wide rate of **83**.
 - (d) The rate of *assault police* incidents flagged by reporting Police as alcohol related across the Queanbeyan LGA was **11**, below the rate of **24** per 100,000 for New South Wales as a whole.
 - (e) The rate of *malicious damage to property* incidents flagged by reporting Police as alcohol related across the Queanbeyan LGA was **153**, above the rate of **122** per 100,000 for New South Wales as a whole.
27. ABS SEIFA data prepared on the basis of the 2011 census indicating that the suburb of Queanbeyan ranked in the 5th decile and the Queanbeyan LGA ranked in the 9th decile, compared to other local government areas and state suburbs in NSW on the Index of Relative Socio-Economic Advantage and Disadvantage (with a decile ranking of 10 being the most advantaged).
28. Email submission from Senior Constable Richard Pearce, Monaro Licensing Coordinator of the Monaro LAC of Police dated 14 June 2016.
29. Submission from the Applicant's solicitor dated 29 July 2016 attaching an email from the Applicant dated 28 July 2016 to their solicitor.