



Mr Grant Cusack
c/o Hatzis Cusack Lawyers
Level 9, 68 Pitt Street
Sydney NSW 2000
5 December 2016

Dear Mr Cusack

APPLICATION NO: APP-1-4405905012
APPLICATION FOR: New Packaged Liquor Licence
PROPOSED TRADING HOURS: Monday to Saturday 9:00AM – 8:00PM
Sunday 10:00AM – 8:00PM

APPLICANT: Mr John Flanjak

**PROPOSED LICENCED
PREMISES NAME:** IGA Kurrajong Heights

PREMISES LOCATION: 1255 Bells Line of Road, Kurrajong Heights,
NSW 2758 (Premises)

ISSUE: Whether to grant or refuse an application for
a new packaged liquor licence.

LEGISLATION Sections 3, 29, 30, 31, 40, 45, 48 *Liquor Act
2007*

**INDEPENDENT LIQUOR AND GAMING AUTHORITY DECISION – APPLICATION FOR
NEW PACKAGED LIQUOR LICENCE – IGA KURRAJONG HEIGHTS**

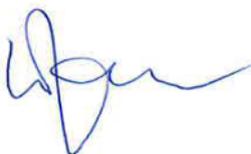
The Independent Liquor and Gaming Authority considered the Application at its meeting on 16 November 2016 and, pursuant to section 45 of the *Liquor Act 2007* (Act), decided to **grant** the Application number APP-1-4473142836 subject to the following conditions:

- 1. Trading Hours**
Monday to Saturday 9:00AM – 8:00PM
Sunday 10:00AM – 8:00PM
- 2.** Section 11A of the *Liquor Act 2007* applies to this licence. Liquor must not be sold by retail on the licenced premises for a continuous period of 6 hours between 3:00AM and 9:00AM during each consecutive period of 24 hours. The licensee must comply with this 6-hour closure period along with any other limits specified in the trading hours for this licence.
- 3.** The business authorised by this licence must not operate with a greater overall level of social impact on the wellbeing 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.

4. The premises must be operated at all times in accordance with the Plan of Management dated May 2016, as may be varied from time to time after consultation with the Local Area Commander of NSW Police.
5. The licensee must ensure that the liquor sales area is adequately defined from the rest of the supermarket by means of a fixed, solid and permanent barrier.
6. The licensee or its representative must join and be an active participant in the local liquor accord.
7. A separate point of sale and cash register within the licensed area must be designated for liquor sales.
8. The licensee of the premises must maintain a closed-circuit television (CCTV) system on the premises in accordance with the following requirements:
 - a) The system must record continuously from opening time until one hour after the premises are required to close.
 - b) Recordings must be in a digital format and have a minimal of 6 frames per second.
 - c) Any recorded image must specify the time and date of the recorded image.
 - d) The systems cameras must cover the following areas:
 - i. The entire licensed area including any entry and exit points to the licensed area.
 - ii. The main entry to the IGA shop.
 - iii. The car park area designated for the customers of IGA.
 - e) All recordings made by the CCTV system must be kept for at least 30 days.
 - f) The system must be accessible by at least one member of staff at all times that it is in operation.
 - g) The licensee must provide any recordings made by the system to a Police Officer or Inspector of L&G NSW within 24 hours of any request by a Police Officer or Inspector to provide such recordings.
9. The licensee must ensure that the placement of spirits is not near the entrance to the licensed area.
10. The licensee must install door sensors at entry of the licensed area to ensure that staff are aware that persons are entering that area.

The licence has been granted subject to a requirement under section 47(2) of the Act that it may not be exercised until the Authority has been provided with evidence that the premises is complete and ready to trade. If you have any advice or enquiries about this letter, please contact case manager via email santina.causa@ilga.nsw.gov.au

Yours faithfully



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 material and submissions before the Independent Liquor and Gaming Authority (Authority) for the purposes of publication of a statement of reasons, as soon as practicable, in a high-volume jurisdiction.
2. In making this decision, the Authority has considered the packaged liquor licence application filed on 10 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.

Summary of Further Submissions

3. Submission from Roads and Maritime Services (RMS), dated 17 May 2016, advising that there were 15 alcohol related crashes in the Hawkesbury City Local Government Area (LGA) during 2014. RMS recommend that the licensee or its representative join and be an active member of the local liquor accord, display education material related to drink driving, and draw customer's attention to the *safe party strategies* available on the NSW Police website or display a list of tips for people hosting social events.
4. Submission from Senior Constable Rochelle Blue, Hawkesbury Local Area Command (LAC) of NSW Police (Police) dated 1 June 2016. In this submission, Police contend that there have been a significant number of incidents whereby liquor products, in particular spirits, have been stolen across the Hawkesbury LAC. Police contend that the placement of bottles within the licensed area has an impact upon the number of stealing offences within bottle shops and recommend the imposition of four conditions upon the licence, in addition to those proposed by the Applicant. These are Conditions 7-10 noted above, and require the implementation of additional security measures on the premises.
5. Report to the Authority dated 6 June 2016 from Compliance Branch of the Office of Liquor and Gaming NSW (LGNSW) advising that the Application was assessed using the Environment and Venue Assessment Tool (EVAT). This means that LGNSW have not performed any specific assessment of the Application.

6. The EVAT report identifies certain risk factors applying to the type of licence, the local environment in which the new business will operate and other factors. These risk factors range from “low” to “moderate” risk.
7. Email submission from the Applicant dated 19 September 2016. The Applicant consents to the imposition of conditions upon the licence (including those recommended by Police and standard conditions proposed by licensing staff). The Authority notes the Applicant’s advice that no response was received to consultation with the local Aboriginal community, the Department of Health, or the Department of Community Services.

Legislative Framework

8. 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.
9. 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.*
10. 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.
11. An application for a new packaged liquor licence is a “relevant application” within the meaning of section 48(2) of the Act for which a CIS is required.
12. Section 48(5) of the Act requires that the Authority must not grant an 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”.

13. 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 Kurrajong Heights.
14. Consistent with the Authority’s long standing policy to find that the broader community comprises the relevant local government area, the Authority is satisfied that the broader community is, at the time of this decision, the area of the Hawkesbury City LGA.

Analysis of Relevant Facts

15. The Authority is satisfied, on the basis of the Application and CIS material before it, 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.
16. 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 packaged liquor licenced venue of the kind proposed in the Application material. The Authority notes that no probity issues were raised with regard to the Applicant following consultation with law enforcement agencies, including Police and LGNSW.
17. 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 with the commencement of licenced trading. This finding is made on the basis of the Applicant’s *House Policy and Management Plan* dated May 2016.
18. The Authority is satisfied, for the purposes of section 45(3)(c) of the Act, that the proposed use of the Premises falls within the scope of development consent. This finding is made on the basis of development consent number DA0459/11 issued by Hawkesbury City Council on 25 January 2012 and the submission made by Hawkesbury Council dated 8 April 2016.

Social Impact – Positive Benefits

19. The Authority is satisfied, on the basis of the Application, CIS and additional material supplied by the Applicant that granting this new licence will provide some additional benefit to those members of the local and broader community who wish to conveniently purchase liquor products while grocery shopping at IGA Kurrajong Heights.
20. The Authority notes, by reference to LGNSW liquor licensing records, that the suburb of Kurrajong Heights currently has 0 packaged liquor licenced premises, 1

registered club and 1 “full” hotel licenced premises. The absence of any devoted packaged liquor licenced business gives some weight to the benefits contended by the Applicant, particularly for the *local community*. While the incumbent local hotel and club are also authorised to sell takeaway liquor, the Authority is satisfied that granting this new licence in this location will provide some additional measure of convenience to those in the local community who seek to purchase liquor at the same time as purchasing grocery shopping at the IGA Supermarket.

21. There was very limited opposition expressed to the Application by stakeholders consulted on the Application. On this basis (noting that support within the community is not unanimous, as discussed below) the Authority is satisfied that granting the Application is broadly consistent with the “expectations, needs and aspirations of the community” in respect of the local community of Kurrajong Heights, being an object of section 3(1)(a) of the Act.
22. The Authority is satisfied, on the basis of the CIS and additional material supplied by the Applicant that granting the Application will also contribute to the balanced development, in the public interest of the local liquor industry serving the local and broader community (particularly the local community), for the purposes of section 3(1)(b) of the Act.
23. The Authority has considered but has given little weight to the Applicant’s contention that granting the Application will bring about a reduction in escaped expenditure from the local community. LGNSW records indicate that there are already liquor licensed premises in the suburb and the Applicant has not provided any persuasive data or analysis to substantiate this claim.
24. The Authority gives little weight to the Applicant’s contention that granting the Application will enable the local and broader community to access liquor products that are difficult to obtain. The Applicant has not specified nor provided evidence of which products will be available at this new business that will not ordinarily be stocked by the incumbent retailers serving the local and broader communities.
25. The Authority gives little weight to the Applicant’s contention that some small measure of public safety may be garnered through reduced travel between stores, by reason that this benefit has not been supported with any evidence or analysis explaining the nature and extent of this purported benefit.

Social Impact – Negative Impacts

26. Having reviewed all of the material before it, the Authority considers that over time there is a risk that liquor sold from this new licenced business will contribute to the prevailing levels of alcohol related crime, disturbance or adverse impact upon amenity in the local and broader communities from a minority of customers who abuse packaged liquor.

27. The Authority notes that the licensed trading hours sought by the Applicant are reasonably extensive across the week but the business will not trade past 8:00 pm on any day. As licensed premises may potentially sell or supply liquor for consumption off the premises until 10:00 pm in New South Wales, this aspect of the Application provides some modest reduction in the scope for liquor sales from *this* business to contribute to adverse social impacts over time.
28. Another mitigating factor is the size of the proposed liquor department, which the Authority notes, on the basis of the Applicant's Plan of the Premises, will be 47 square metres. This is smaller in size than many standard packaged liquor outlets.
29. When considering the cumulative impact of adding another licence to the relevant communities, LGNSW liquor licence density data satisfies the Authority that the Hawkesbury City LGA has lower rates of liquor licences per 100,000 persons of *packaged liquor licences, registered club licences and full hotel licences* per 100,000 persons compared to the rates for New South Wales as a whole. The Authority does not consider that prevailing licence density *per se* gives rise to any particular cause for concern in the local and broader community.
30. There is moderate cause for concern with respect to the broader community arising from the BOCSAR *Report on Crime by LGA and Alcohol Related Status* for July 2010 to June 2015 which indicates that during the 2014/15 financial year the Hawkesbury City LGA had slightly higher rates per 100,000 persons than NSW for incidents of *domestic violence related assault*.
31. However, the Authority's concern is alleviated somewhat by the fact that the BOCSAR Crime Maps based upon data from July 2015 to June 2016 indicate that the Premises is not located within any prevailing hotspots for incidents of *domestic assault*. The Authority further notes that the crime data for the broader community has not translated into any evidence based objection from Police identifying concerns as to alcohol related crime pertaining to this local community or the area within that community where this business will operate. Furthermore, the Applicant's acceptance of the additional conditions proposed by Police is a factor that serves to minimise any potential negative impact that the licence may have on the *local and broader community*.
32. The Authority is further satisfied, on the basis of the ABS SEIFA data, that both the suburb of Kurrajong Heights and the City of Hawkesbury City LGA are relatively advantaged on the Index of Relative Socio-Economic Advantage and Disadvantage, with Kurrajong Heights the Hawkesbury City ranked in the 9th decile (with a decile ranking of 10 being the most advantaged).
33. With regard to the contention made by Police that there has been a substantial amount of liquor product theft in the Hawkesbury LGA, the Authority accepts this submission as credible but the Hawkesbury LGA is a broad and diverse geographic area and Police have not indicated the nature and extent of this problem within the

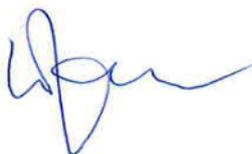
LGA or the State suburb of Kurrajong Heights – the local community being most likely to be directly affected by the operation of this new business.

34. The Authority further notes that the Applicant has consented to additional security measures designed to reduce the risk of alcohol product theft. For these reasons, the prevalence of alcohol product theft in the Police command, while accepted an adverse factor, has not been a decisive factor while assessing overall social impact of granting this Application.
35. The Authority notes that only one objection was received in response to the Application, notwithstanding the consultation engaged in by the Applicant. A neighbouring property owner expressed concern for the potential that the new licence will contribute to disturbance to the amenity of the area immediately outside of the Premises and that this location is sensitive by reason a Church is nearby and the road outside is used as a drop-off point for school children.
36. The Authority accepts that there is a nearby Church and a pickup point for school children, but it is not uncommon for licensed retail supermarkets to be located in close proximity to those sites.
37. The Authority accepts that residents may hold genuine concerns as to the potential adverse amenity impacts of enabling a supermarket to sell liquor. However, in the absence of any evidence or other material demonstrating the nature and extent of any existing public abuse of packaged liquor in these communities (notwithstanding that there are other venues licensed to sell packaged liquor) the Authority is unable to give substantial weight to this submission. The Authority notes that no adverse submission was made by the Church or the school. No objection was made by any law enforcement agencies (Council, Police or LGNSW) as to any localised alcohol related social problems nor have they made adverse submissions regarding the proximity of any sensitive facilities or areas.
38. When assessing the scope of negative impacts that may flow from granting this licence the Authority has taken into account the measures to be implemented by the business, disclosed in the Application and CIS to reduce the risk of alcohol related harms. They include security measures designed to reduce alcohol product related theft and the sale of alcohol to minors and other measures to separate the liquor section from the rest of the supermarket.
39. The Authority has also had regard to the reasonably detailed harm minimisation measures set out in the *Management Plan* dated April 2016 and the licence conditions to which the Applicant has consented, including additional measures sought by Police regarding CCTV.

Conclusion

40. 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 Applicant, Council, RMS, neighbouring occupiers, NSW Health and Department of Community Services and all other parties required to be consulted under the legislation.
41. Having considered together the positive benefits and negative impacts that the Authority is 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.
42. The Application is granted pursuant to section 45 of the Act.
43. 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: 16 November 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 on 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. Submission from Christopher Hallam and Associates Pty Ltd dated 5 April 2016, objecting to the proposal during the CIS consultation phase. This 2- page submission is made by the owners of Lochiel House, which adjoins the Premises. Briefly, the property owners object on the following grounds:
 - a) Lochiel House is being converted from a restaurant business to a residence.
 - b) Patrons of the Premises may choose to consume alcohol in or around the Premises.
 - c) St David's Uniting Church is located approximately 25 metres away from the Premises. A liquor store in such close-proximity is a community concern.
 - d) The road outside Lochiel House is presently used by school buses as a pickup and drop-off point. A liquor store in such close-proximity is a community concern.
 - e) There is already a bottle shop attached to the Archibald Hotel in Kurrajong Heights, a bottle shop located in the State suburb of Kurmond, and a bottle shop located in Kurrajong, as well as three liquor shops in the State suburb of North Richmond.
2. Email submission from Hawkesbury City Council dated 8 April 2016 noting that business proposed by the Application is consistent with the development consent for the Premises.
3. Application Form lodged on 10 May 2016, including:
 - a) Notices of the Application sent to various public agencies and other stakeholders, dated 9 May 2016.
 - b) Development Application No. DA0459/11 issued by Hawkesbury City Council on 25 January 2012 for the reinstatement and use of the existing building as a refreshment room and the construction of a building consisting of a shop.
 - c) Applicant *Management Plan* for the proposed business dated May 2016.
 - d) ASIC Current Organisation Extract dated 20 April 2016 for Flanjak Pty Ltd.
 - e) Plan of the Premises highlighting in pink the proposed licenced area. The licenced area is recorded as 47 square metres.
4. CIS document and supporting material dated 9 May 2016, filed with the Application on 10 May 2016.
5. Additional Information about the Application and CIS filed on 10 May 2016. In this 17-page document prepared by the Applicant's solicitors, Hatzis Cusack, the Applicant provides information about the Application, the location of the Premises, manner of operation and facilities to be provided, suitability of the site for a packaged liquor facility, responsible service of liquor, access to liquor by minors, position with Council, projected community growth/development, expected completion of the Premises, contended positive benefits of granting the Application, proposed conditions to be imposed on the licence, the proposed 6-hour closure period, the location of nearby community buildings, facilities and places, notification of stakeholders and issues raised during consultation.

6. The Authority notes that in response to a submission from a neighbouring property owner through Christopher Hallam & Associates, received by the Applicant during the pre-Application consultation process, the Applicant made the following contentions:
 - a) Council has issued development approval and was satisfied that the grant of the Application would meet all planning considerations and not result in undue environmental impact.
 - b) The proposed liquor department will be small and located within the IGA and measures will be implemented to minimise supply of alcohol to minors.
 - c) The Premises will operate in accordance with the Plan of Management.
 - d) There are various existing IGA stores in similar locations that do not result the type of conduct raised in the submission by Christopher Hallam & Associates.
 - e) There is no evidence that public drinking in Kurrajong Heights is an issue.
 - f) The Applicant understands that Lockiel House is intended to continue functioning as a commercial premises according to a listing on realcommercial.com.au accessed on 11 April 2016.
 - g) St David's Church has not raised an objection to the Application.
 - h) It is not uncommon for a licensed supermarket to be near facilities utilised by minors.

7. In its submission of 10 May 2016, the Applicant also discusses (by apparent reference to the social impact factors identified in Authority *Guideline 6*) the type, scale, hours of the Premises, licence density, SEIFA data, BOCSAR crime data, and measures to be implemented to reduce the potential for alcohol related harms and submits that there will be no adverse impact to the area.

8. The Applicant has also provided IGA Kurrajong Heights *House Policy* detailing policies for the responsible service of liquor including prevention of sale of alcohol to minors and intoxicated persons, consumption of alcohol on the premises, responsible service of alcohol training, signage, and CCTV.

9. BOCSAR Crime Maps based upon data from July 2015 to June 2016 indicating that there are no hotspots for the concentration of instances of *assault (domestic and non-domestic)* or *malicious damage to property* at or near the location of the Premises.

10. Liquor licensing records from LGNSW indicating that the suburb of Kurrajong Heights has 1 registered club licence, 1 full hotel licence and 0 packaged liquor licenced premises.

11. Liquor licence density data from LGNSW indicating that the Hawkesbury City LGA as a whole recorded:
 - (a) A rate of **20.86 packaged liquor licences** per 100,000 persons, which is below the NSW state wide rate of **32.85**.
 - (b) A rate of **8.02 registered club licences** per 100,000 persons, which is well below the NSW state wide rate of **20.48**.
 - (c) A rate of **16.05 full hotel licences** per 100,000 persons, which is substantially below the NSW state wide rate of **30.36**.

12. BOCSAR Report on *Crime by Local Government Area and Alcohol Related Status* for July 2010- June 2015:
 - (a) The rate of *alcohol related domestic violence related assault* incidents across Hawkesbury City LGA from July 2014 to June 2015 was **123.6** per 100,000 persons, slightly higher than the New South Wales rate of **122.6** per 100,000 persons.
 - (b) The rate of *alcohol related non-domestic violence related assault* incidents in Hawkesbury City LGA from July 2014 to June 2015 was **123.6**, slightly less than the State-wide rate of **144**.
 - (c) The rate of *alcohol related offensive behaviour* offences across Hawkesbury City LGA from July 2014 to June 2015 was **18.3** per 100,000 persons, well below than the State-wide rate of **88.2**.
 - (d) The rate of *alcohol related assault police* incidents across Hawkesbury City LGA from July 2014 to June 2015 was **15.3**, lower than the rate of **18.2** per 100,000 for New South Wales as a whole.
13. Data on alcohol related crime obtained from published BOCSAR sources for period between July 2014 and June 2015.
14. ABS SEIFA data prepared on the basis of the 2011 Census indicating that the State suburb of Kurrajong Heights and the Hawkesbury LGA both 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).
15. Google geographical maps depicting an aerial view of the location of the Premises.
16. Email submission from Aboriginal Affairs, dated 11 May 2016, recording no objection to the Application provided that the NSW Aboriginal Land Council and the Local Aboriginal Land Council has been afforded the opportunity to make comment.
17. Submission from RMS dated 17 May 2016.
18. Submission from Senior Constable Rochelle Blue, Hawkesbury Local Area Command dated 1 June 2016.
19. Report to the Authority dated 6 June 2016 from LGNSW.
20. Email from Authority staff to the Applicant dated 12 September 2016, acknowledging the conditions consented to by the Applicant in the CIS and inviting the Applicant to make comment on submissions made by Police and the Compliance Branch of the Office of LGNSW.
21. Email submission from the Applicant dated 19 September 2016 made in response to the email from Authority staff dated 12 September 2016.