



Mr Ripple Parekh
Director
Postal Angels Pty Ltd
63 Aberford Street
COONAMBLE NSW 2898
Ripple.parekh@gmail.com

7 November 2016

Dear Mr Parekh,

APPLICATION NO: APP 1-4238597090
APPLICATION FOR: New Packaged Liquor Licence
PROPOSED TRADING HOURS: Monday to Saturday 10:00AM – 08:00PM
Sunday 10:00AM – 08:00PM

APPLICANT: Postal Angels Pty Ltd (ABN 13 115 900 224)

PROPOSED LICENSED PREMISES NAME: Coonamble Supa IGA

PREMISES LOCATION: 63 Aberford Street, COONAMBLE NSW 2829

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 –**

The Independent Liquor and Gaming Authority considered the Application at its meeting on 26 October 2016 and, pursuant to section 45 of the *Liquor Act 2007* (Act), decided to **refuse** the Application number APP-1-4238597090.

Attached is a statement of reasons for the Authority's decision. If you have any enquiries about this letter please contact the case manager, Ms Santina Causa via email to 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 31 March 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, obtained 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. Thirty-eight submissions from community stakeholders, mainly local businesses and residents, received within the submission period between 24 April 2016 and 23 May 2016. The submissions include a 39-page petition containing over 630 signatures that urge *refusal* of the Application. The overwhelming majority of the remaining submissions contend that there are ongoing negative social impacts from alcohol abuse occurring within Coonamble, exacerbated by poor local economic conditions and drought. Almost all submitters refer to Coonamble's high incidence of alcohol-related crime, with many contending that there is a high level of liquor availability within the Coonamble township.
4. Submission from Mr Rick Warren, General Manager of Coonamble Shire (Council), dated 16 May 2016. Council outlines the concerns it has regarding the risk of congestion around the Premises and the potential impacts that the new licensed business may have upon nearby declared alcohol free zones (AFZs) and community areas such as the Council's swimming pool and a nearby public park. Accompanying Council's submission is the Notice of Application from the Applicant to Council dated 21 March 2016. When actioned on 22 March 2016, Council indicated that no development consent was required to permit the proposed business or activity (selling liquor by retail) from the Premises.
5. Submission from Sergeant Lisa Jones of the Castlereagh Local Area Command (LAC) of NSW Police (Police), dated 26 May 2016. In this 28-page document Police strongly object to the Application, citing the potential for the new business to have an overall detrimental social impact upon the local and broader communities. Police have specifically noted the lack of detail within the CIS compiled by the Applicant, given the potential negative impacts upon the community by way of granting such a licence. A comment by Inspector Paul Stephens, member of the Castlereagh LAC Senior Management team, additionally noted a "distinct lack of consultation" with Police in the process of making the Application.

6. Within the body of the submission, Police refer to the number of existing licenced premises within the town (State Suburb) of Coonamble, noting that a packaged liquor outlet (Coonamble Cellars) and a licenced club (Coonamble Bowling Club) are within 150m of the Applicant's premises. Police advise the names and addresses of 3 registered club licences, 5 full hotel licenced premises and 2 packaged liquor licenced premises. Police contend that the existing density of premises with liquor availability in a town of 4262 residents has contributed to Coonamble's high crime rates, citing research that demonstrates "*the concentration of licensed premises does correspond with an increase in alcohol-related anti-social behaviour, criminal activity and harm.*" (Allen Consulting Group, *The Cumulative Impact of Licensed Premises in NSW – Phase 1 Report*", report to the NSW Office of Liquor Gaming & Racing, (2012), p. 39.) Police advise that they focus upon patrolling Aberford Street, where the Premises is located, due to the high rates of crime within this area.
7. Police compare prevailing high levels of alcohol-related crime in Coonamble to the rates recorded for New South Wales. Police submit that there is a correlation between alcohol fuelled domestic violence and at-home consumption of alcohol generally. Police refer to BOCSAR's report on *New South Wales Recorded Crime Statistics 2015* to illustrate that within Coonamble, alcohol is a contributing factor in **51%** of all incidents of *non-domestic assault*, **31%** of all incidents of *domestic violence assault*, and **58%** of all incidents of *offensive conduct*.
8. Police further address the health implications of alcohol-abuse, citing the 2013 National Drug Strategy Household Survey (NDSHS) conducted by the Australian Institute of Health and Welfare (AIHW) that identified excessive alcohol consumption as one of the major contributors to a wide range of health and social harms. Police note that Aboriginal and Torres Strait Islander (ATSI) people comprise approximately 36% of the Coonamble population, being the second-highest indigenous population in Western NSW. Police state that 85% of clients serviced by the Coonamble Aboriginal Health Service's (CAHS) Alcohol and other Drug (AOD) Unit identify drinking at a "hazardous" level, defined by the CAHS as someone who consumes more than ten standard drinks at one sitting. Police further note that CAHS' "hazardous" classification is "five times" higher the national average, based upon the NDSHS' definition of a "lifetime risky drinker" being a person who consumes more than two standard drinks per day (on average over a twelve-month period).
9. The Police submission annexes BOCSAR's report on *New South Wales Recorded Crime Statistics 2015*, focusing upon *trends, rate comparisons and recorded criminal incidents by regions and LGAs* in support of their submission. This is accompanied with specifically generated reports from the Police Enterprise Data Warehouse (EDW) focused upon crime statistics within the suburb of Coonamble, contained in Annexures 2-7.
10. Annexure 2 to the Police submission notes discrete incidents of alcohol-related crime in Coonamble from October 2015 to April 2016, showing a total of **226** incidents of alcohol-related crime in that period; Annexure 3 deals with time of day occurrence of alcohol-related crime, showing that the majority of such crimes occur within the timeframes of 21:00 to 24:00 hrs and 24:00 to 03:00 hrs; Annexure 4 arranges alcohol-related crime by time of week occurrence, showing that the majority of alcohol-related crimes occur on Friday, Saturday and Sunday; Annexure

5 deals with the *total* number of crimes in Coonamble, showing **1664** instances of crime between October 2015 to April 2016; Annexure 6 focuses specifically upon the location of alcohol-related crimes, and demonstrates that **29** of the total **226** instances of alcohol-related crimes in Coonamble were committed within the postcode of 2829, and **16** of those crimes occurred on Aberford St, near the location of the Applicant's premises and Annexure 7 indicates that **97** instances of *total crime* occurred on Aberford St from October 2015 to April 2016, out of **218** instances of *total crime* reported within the postcode of 2829.

11. Annexure 8 to the Police submission is a Computerised Operational Policing System (COPS) report from the Castlereagh LAC dated 27 February 2016 pertaining to an incident involving theft of alcohol products from a licenced premises, to demonstrate a local risk of alcohol related theft.
12. Email submission from the Applicant dated 29 September 2016, consenting to the imposition of a daily closure period, for the purposes of section 11A of the Act between 04:00am and 10:00am. In this email the Applicant provides a Record of Registration for the Applicant Company from the Australian Securities and Investment Commission (ASIC), and an undated Plan of Management.
13. In the same email, the Applicant attaches a 20-page submission responding to the public submissions made on the Application. The Applicant noted concerns as to the number of existing licenced premises within Coonamble and the negative impacts of alcohol abuse, while advising that the aim of this Application is to provide added convenience for those who are responsibly consuming alcohol in the community, not the promotion of alcohol consumption. The Applicant annexes a floor plan that depicting the proposed "liquor department" as comprising 75 square metres out of a total supermarket trading area of 780 square metres, with the total building area occupying 1128 square metres. The Applicant **submits** that since the liquor area would only form a relatively small proportion of the total building area, the effect would be added convenience for existing customers, rather than the promotion of excessive consumption of alcohol in the communities.
14. The Applicant also contends that many of the public submissions made in opposition to the Application were motivated by "pecuniary" interests, noting that submissions were made by Mr Rodney Vallett (owner of Coonamble Cellars, a packaged licenced premises), Ms S. Vallett (relation of Mr Vallett), Mr Garen Penell (owner of the Coonamble Bowling Club, a licenced club), Mr D Canham (an employee of the Coonamble Bowling Club), Mr Barry Nelson (owner of the Terminus Hotel, a licenced hotel), Mr P Wooding (relation of Mr Nelson), and Mr J Browne (employee of Coonamble Cellars).
15. In an email submission from the Applicant dated 17 October 2016, it was advised that no further Development Approval was required from Coonamble Shire Council to conduct the business activity that is the subject of this Application (to sell liquor from an existing IGA Supermarket). The email attached a revised "Plan of Management", also dated 17 October 2016, with the submission. The Plan is a document of four pages identifying the manager of the proposed liquor department and other "persons of responsibility". The Plan details the conditions to which the licence would be subject if granted (including mandatory 6-hour closure period), the proposed licensed trading hours, compulsory Responsible Service of Alcohol (RSA) training, measures to counteract the risk of sales to minors and intoxicated

persons, use of appropriate signage required by LGNSW, discouragement of practices that may facilitate the irresponsible consumption of alcohol (including liquor marketing and promotions), consultation with local Police and security & safety measures to be implemented by the proposed licensed business.

Legislative Framework

16. 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.
17. 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.*
18. 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) to ensure that the overall impact of the licence, authorisation or approval being considered will not be detrimental to the local or broader community.
19. 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.
20. 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”.
21. 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 Coonamble.
22. 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 Coonamble Shire Council.

Analysis of Relevant Facts

23. The Authority is satisfied, based on 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 legislative requirements for the Application, CIS and community consultation have been satisfied.
24. 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 licensed venue of the kind proposed in the Application material. The Authority notes that no probity issues were raised in response to the Application following consultation with law enforcement agencies, including Police and LGNSW.
25. 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 licensed trading. This finding is made on the basis of the Plan of Management dated 17 October 2016.
26. 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 existing development consent for the Premises. This finding is made based on the submission from Council dated 22 March 2016 advising that no further development consent is required for the proposed activity that is the subject of this Application. The Authority notes that the Premises is already operating as a retail Supermarket.

Social Impact – Positive Benefits

27. The Authority has taken into account the Applicant's contentions about positive benefits from granting the licence and accepts that there will be some benefit of convenience provided by way of licensing a supermarket to those in the local and broader community who prefer to purchase liquor at the same time as purchasing groceries, or prefer to shop for liquor in a supermarket rather than local hotels.
28. The Applicant submitted a community petition of approximately 150 signatures from residents *in support* of their Application, collected between 29 February 2016 and 10 March 2016. In this sense granting the Application may be expected to advance the expectations, needs and aspirations of the communities, which is a statutory object of section 3(1)(a) of the Act. That evidence is met by a considerable number of local submissions and petitioners in opposition to the Application, so there is evidence of both significant local community support and opposition to the new licence.
29. LGNSW liquor licensing records and the Police submission indicate that the State Suburb of Coonamble currently accommodates 3 registered club licences, 5 full hotel licenced premises and 2 packaged liquor licenced premises – all of whom may potentially sell liquor for consumption off the premises.
30. The number, location and licence type of the incumbent liquor outlets servicing these small communities diminish the extent to which granting this Application at the Premises will advance community expectations, needs and aspirations for section 3(1)(a) and contribute to the balanced development of the liquor industry for

the purposes of section 3(1)(b) of the Act.

Social Impact – Negative Impacts

- 31.** The Authority has noted a range of responsible persons, including local Police and the Aboriginal Health Service (AHS) objecting to the Application because of the prevailing local problems of alcohol abuse and alcohol related crime. While the Authority accepts the Applicant's submission that numerous local resident submitters have an association with commercial competitors, that is not the case with all the local submitters.
- 32.** The Authority gives weight to the local knowledge and experience of Police (who have provided a detailed and evidence based submission) and the AHS, whose submissions are reinforced by very poor BOCSAR alcohol related crime data and relatively high licence density.
- 33.** While the Applicant has prepared a CIS that meets the minimum requirements of the Act the Applicant had not persuasively addressed the negative crime data and adverse socio demographic factors in evidence in the material before the Authority. These are matters for which all applicants are on notice (through Authority Guideline 6) as matters that the Authority will consider when assessing the overall social impact of granting a new licence.
- 34.** While the Applicant has provided a Plan of Management to manage the usual risks associated with the sale and supply of alcohol for consumption off premises, the Plan provides little by way of indication as to what substantial measures, over and above the minimum requirements of the legislation, will be utilised to minimise or reduce harm given the elevated risks posed by alcohol abuse in these communities.
- 35.** The Application and CIS indicates that the scale of the proposed liquor department of the Supermarket is 75 square meters. The Authority notes that this is less extensive than many stand-alone liquor stores. The licensed trading hours sought by the Applicant are reasonably extensive across the course of the week. While the business will not trade after 8:00 pm, reducing to some extent the capacity of liquor sales to contribute to adverse impacts on higher risk weekend evenings, there remains considerable scope for liquor sales from this new business to contribute to prevailing adverse social impacts in the communities.
- 36.** There is insufficient evidence before the Authority to find whether the addition of another packaged liquor licence for a business of this scale will increase, decrease, or make no difference to the level of liquor consumed in the local or broader community.
- 37.** New South Wales does not mandate the collection of wholesale liquor sales data that has enabled researchers in other jurisdictions to identify an association between volumes of liquor sold and assault rates in a local government area (Liang W and Chikritzhs T: "Revealing the link between increased licensed outlets and violence: Counting venues versus measuring alcohol availability" (2011) *Drug and Alcohol Review* (September 2011)- as noted in *Authority Guideline 6*).
- 38.** Adopting a conservative approach and assuming for the purposes of this decision that the new business will do no more than cannibalise the existing local demand for

retail takeaway liquor, the business may nevertheless be expected to *contribute*, along with the incumbent retailers, to the relatively serious problems associated with the abuse of packaged liquor in these communities.

39. The rates of alcohol related domestic violence evident from the BOCSAR data are given weight when assessing the negative impacts arising from the grant of this type of licence, given that most packaged liquor will be consumed in private residences where most domestic violence occurs.
40. When considering the cumulative impact of adding another licence, LGNSW liquor licence density data indicates that Coonamble Shire already has significantly higher rates of *packaged liquor licences, registered club licences* and *full hotel licences* per 100,000 persons compared to New South Wales.
41. At the local level, LGNSW liquor licensing records establish that the State Suburb of Coonamble already accommodates 3 registered club licences, 5 full hotel licences, 4 on-premises licences, and 2 packed liquor licences.
42. The high levels of licence density in the local and broader community amount to an adverse factor when considered in the context of the relatively high prevailing rates of alcohol related crime.
43. The BOCSAR *Report on Crime by LGA and Alcohol Related Status* for July 2010 to June 2015 records that during 2015 Coonamble's incidents of crime per 100,000 persons of *alcohol related domestic violence assault* are *well above* the rate for New South Wales while *the alcohol related non-domestic assault* rate was also *substantially above* the State-wide rate.
44. At the local community level, BOCSAR Crime Maps for crime recorded between July 2015 and June 2016 indicate that the Premises is located within hotspots for the concentration of domestic assault, non-domestic assault and malicious damage to property events.
45. The ABS Socio Economic Index for Areas (SEIFA) data establishes that the State Suburb of Coonamble and the Coonamble Shire are very disadvantaged communities, ranking on the first decile on the Index of Relative Socio-Economic Advantage and Disadvantage. Socio economic disadvantage is a compounding factor of concern when assessing the resources available to these communities to respond to and manage adverse alcohol related social impacts when they occur.
46. Finally, the Authority accepts Council's advice in its submission dated 16 May 2016 that the Premises is situated within an established Alcohol Free Zone. This information provides a further objective adverse factor when considering the potential for a new takeaway liquor business in this location to frustrate attempts by Council to manage public drinking within the local community in the area surrounding the Premises.

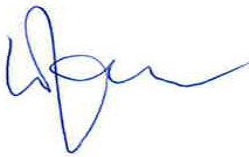
Conclusion

47. The Authority is satisfied that procedural fairness was afforded to the Applicant and interested parties regarding the decision whether 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 the Applicant, Police, Council, RMS, neighbouring occupiers, NSW Health, Department of Community Services and all other parties required to be consulted under the legislation.

48. 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 not 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.
49. The Application is **refused** pursuant to section 45 of the Act.
50. 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) but has given weight to the need to minimise harm associated with misuse and abuse of liquor (including harm arising from violence and other anti-social behaviour) for the purposes of section 3(2)(a) of the Act 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 for the purposes of section 3(2)(c) of the Act.

Decision Date: 26 October 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/ilqa/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. Notice of Application sent to various public agencies and stakeholders dated 3 February 2016.
2. Letter from Mr Tim Horan, CEO, Coonamble Aboriginal Health Service, dated 8 February 2016. This brief letter is addressed to the Coonamble Liquor Accord and objects to the Application, citing the impact of alcohol on nearly half of all domestic violence and child protection cases, and Coonamble's high relative rankings in 6 out of 10 recorded crime categories in NSW.
3. Submission from Mr Stephen Hind, President of the Coonamble Local Liquor Accord, dated 8 March 2016 to the Office of LGNSW, *objecting* to the Application. This submission outlines the potential negative social impacts of a new licenced premises in Coonamble, citing the number of existing licenced premises within Coonamble, which has a population of around 3000 people.
4. Community Impact Statement Form (CIS) and supporting material (including a community petition) dated 18 March 2016.
5. Application Form lodged on 31 March 2016.
6. Record of Registration issued by ASIC, for "Postal Angels Pty Ltd" dated 19 August 2015, with next listed renewal date 19 August 2018, annexed in support of the Application.
7. Company Statement issued 25 August 2015 for "Postal Angels Pty Ltd", the Organisation Applicant, annexed in support of the Application.
8. Email submission from Mr Rick Warren, General Manager of Coonamble Shire (Council), dated 16 May 2016. The submission specifies Council's concerns regarding the risk of traffic congestion around the proposed licenced premises, and potential social impacts upon nearby alcohol free zones and community areas. Council's response indicates that development consent was not required to permit the activity that is the subject of the Application.
9. Thirty-eight (38) submissions received during community consultation period from 24 April 2016 to 23 May 2016, mainly from local businesses and residents. The submissions include a 39-page petition of over 600 signatures urging refusal of the Application. The overwhelming majority of submissions concern the continued negative impacts of alcohol abuse within Coonamble, exacerbated by economic conditions of drought.
10. Submission from Sergeant Lisa Jones of the Castlereagh Local Area Command (Police) dated 26 May 2016, *objecting* to the Application. The submission annexes BOCSAR's report on *New South Wales Recorded Crime Statistics 2015*, focusing upon *trends, rate comparisons and recorded criminal incidents by regions and LGAs*, with further annexures based upon Police Enterprise Data Warehouse (EDW) statistics pertaining to the suburb of Coonamble. The Submission also provides a recent Coonamble police report generated from the Computerised Operational

Policing System (COPS) dated 27 February 2016 pertaining to an incident of theft of alcohol from a packaged liquor licenced outlet.

11. Report to the Authority dated 21 September 2016 from the Compliance Branch of Liquor and Gaming NSW (LGNSW). While LGNSW raise no concerns with the Applicant, the “location risk” for other licensed premises is assessed as moderate. LGNSW note that there are already 16 licensed premises in the suburb of Coonamble, thirteen of which may sell takeaway liquor, with two (Coonamble Bowling Club and Coonamble Cellars) within walking distance of the Premises. LGNSW submit BOCSAR crime data for July 2015-July 2016 indicates that Coonamble Shire Council recorded high levels of crime in the following categories:

(a) a rate of **1,025.2** *alcohol-related non-domestic assault* incidents per 100,000 persons, well above the state-wide average of **274.6**.

(b) a rate of **279.6** *alcohol-related offensive conduct incidents* per 100,000 persons, substantially above the state-wide average of **79.6**.

12. Email submission from the Applicant dated 29 September 2016, consenting to the imposition of a daily closure period between 04:00am and 10:00am, as per s11A(3) of the Act. The Applicant also provided an Applicant company registration from ASIC, a revised Plan of Management dated 17 October 2016. The Applicant also addressed community submissions, annexing a floor plan of the proposed Premises within the Applicant’s existing business, depicting the “New Liquor Store” taking up 75sqm of the business’ 780sqm of trading area.

13. Email submission from the Applicant dated 17 October 2016, advising that no further Development Approval was sought from Coonamble Shire Council. The Applicant also attached a revised and dated Plan of Management dated 17 October 2016.

14. BOCSAR Crime Maps based upon data from July 2015 to June 2016 detailing hotspots for the concentration of offences near the location indicating that the Premises:

(a) Is located within a *medium density hotspot* for incidents of *domestic assault*

(b) Is located near a *low-density hotspot* for incidents of *non-domestic assault*

(c) Is located within a *medium density hotspot*, and near a *high-density hotspot*, for incidents of *malicious damage to property*

15. LGNSW liquor licensing records indicating that the suburb of Coonamble already has 3 registered club licences, 5 full hotel licences, 4 on-premises licences, and 2 packaged liquor licences.

16. Map prepared by licensing staff illustrating the locations of existing licenced premises in relation to the proposed Premises.

17. LGNSW liquor licence density data indicating that Coonamble Shire as a whole recorded:

(a) A rate of **321.86** *packaged liquor licences* per 100,000 persons, which is well above the NSW state wide rate of **32.85**.

(b) A rate of **123.79** *registered club licences* per 100,000 persons, which is substantially above the NSW state wide rate of **20.48**.

(c) A rate of **247.59** *full hotel licences* per 100,000 persons, which is well above the NSW state wide rate of **30.36**.

(d) A rate of **272.34** *on-premises licences* per 100,000 persons, which is significantly above the NSW state wide rate of **121.31**.

18. BOCSAR *Incident Counts and Trends* 2010-2013, comparing postcode 2829 and the suburb of Coonamble with NSW overall.

19. Crime data sourced by licensing staff from BOCSAR statistics for 2010-2013 on the seasonality of offences and noting that the Coonamble Shire (LGA) experiences higher instances of *domestic violence assault* in the months of January, February, March, April and October, as compared to NSW overall. Coonamble LGA also experiences high occurrences of *non-domestic violence assault* and *malicious damage to property* in relation to NSW overall. Further BOCSAR crime data compares alcohol-related offences by day of week and time of day and between Coonamble LGA and NSW overall.

20. The BOCSAR *Report on Crime by Local Government Area and Alcohol Related for 2010-2015* indicates that, during the final year of that period:

(a) Coonamble LGA has a rate of **198** *alcohol related assault police* incidents per 100,000 persons, well above the state-wide rate of **24**.

(b) Coonamble LGA has a rate of **768** *alcohol related domestic assault* incidents per 100,000 persons, well above the state-wide rate of **145**.

(c) Coonamble LGA has a rate of **1,089** alcohol-related incidents of *non-domestic assault* per 100,000 persons, well above the state-wide average of **191**.

(d) Coonamble LGA has a rate of **223** alcohol-related incidents of *offensive conduct* per 100,000 persons, substantially above the state-wide average of **83**.

21. ABS SEIFA data prepared based on the 2011 Census indicating that the State suburb of Coonamble ranked in the 1st decile and Coonamble LGA ranked also in the 1st 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).

22. Risk rating report on the Application generated by LGNSW, noting a high degree of potential negative community impact, and the relatively high rates of prevailing crime within Coonamble LGA.

23. Google geographical maps depicting an aerial view of the Premises and area.