

# Howard Smith Wharves, Brisbane City

Application for Commercial Special Facility Licence and Approved Extended Trading Hours

**Community Impact Statement** 

Prepared for HSW Nominees Pty Ltd



#### **INDEX**

1.	Types	of public interest assessment
2.	Intro	duction
3.	Meth	odology 6
4.	Local 4.1	Community Profile
5.	5.1 5.2 5.3	Description of the local community area
6.	Com	nunity risk assessment data
7.	7.1 7.2 7.3 7.4 7.5 7.6 7.7 7.8 7.9 7.10 7.11 7.12 7.13 7.14 7.15 7.16	Nature and type of facilities to be provided 12 Impact on the community as a whole 12 Impact on vulnerable groups 12 Noise/Amenity 12 Employment created 13 Cultural and recreational benefits 13 Benefits to the local community 13 Tourism benefits 13 Impact on traffic 14 Safety issues 14 Impact on the character/identity of the locality 15 Proximity to community sensitive facilities 15 The impact of trading hours 15 Number, distribution and condition of existing licensed premises 16 The extent and quality of services currently provided in the area 16 Concentration of licensed venues in the locality 16
8.	Surv	ey consultation in the local community area
9.	Conc	lusion



#### Type of community impact statement 1.

This community impact statement has been prepared in accordance with the Office of Liquor and Gaming Regulation's ("OLGR") Guideline 38 and is a "Full" assessment. This is on the basis that the application is for a Commercial Special Facility Licence, with trading hours of 7.00am to 1.30am.

#### 2. Introduction

E.

In 2013, Brisbane City Council invited the development industry to submit Requests for Proposals (RFP) to revitalise the Howard Smith Wharves (HSW) site as a world-class riverfront destination.

Following an extensive evaluation process, Council announced in 2014 the HSW Nominees Pty Ltd were selected as the preferred candidate to develop the site. HSW Nominees directors have a track record in refurbishing heritage listed and derelict buildings into successful, high profile, unique and iconic operations and in creating and operating hospitality, tourism and event spaces. Their projects include Victoria Park Golf Complex, Halcyon House, Bunk Backpackers and Birdie Num Num in Fortitude Valley and Leckhampton House at Kangaroo Point.

The redevelopment of the Howard Smith Wharves will include a new riverside parkland and commercial development, helping to shape Brisbane's city centre while catering for its growing population and increased visitation.

The 3.43 hectare site will be vibrant, sustainable and iconic following the completion of its revitalisation. It will reactivate and re-energise a culturally important precinct. At its heart, Howard Smith Wharves will provide a high-quality public realm that celebrates its history and prime waterfront location, delivering an inclusive space for residents, workers and visitors alike.

In December 2015, the development application for the design was approved with construction expected to start in 2017.

The Howard Smith Wharves redevelopment is transforming an underutilised site to create a new Brisbane landmark. A world class recreation, lifestyle, event and tourism destination providing access to and from the river. The site will be transformed into a riverside precinct with more than 2.7 hectares of public open space, a 164 room hotel, an exhibition centre and restaurants and cafes. The development will connect the New Farm Riverwalk and the CBD, revitalise Petrie Bight and respect the heritage of the site.

The applicant's vision is to create a new riverside precinct loved by Brisbane's residents and visitors. The plan is low scale but high quality. Public space and parkland dominates the site and the existing heritage buildings will be restored and reused.

Key features of the proposed design include:

- a dining, retail and tourism centre utilising the existing heritage listed buildings
- new public open spaces that may be used for markets and festivals
- 164 rooms in a 5 star Art Series Hotel (this will be separately licensed under a Commercial Hotel Licence)



- a hotel façade that blends into the cliff face with natural tones and textures to keep the iconic Story Bridge as the main focus
- underground car park for 359 vehicles
- 33 employee bicycle spaces and a further 50 bicycle spaces for visitors throughout the parkland
- parkland and public open spaces including lifts linking the site to the top of the cliffs
- a 1500 square metre exhibition space.

The open space will be the venue for a range of public events. The buildings will be low scale, below the height of the cliffs and with lower building density than allowable under Brisbane City Council's code. Cycle connections will be maintained during construction and a dedicated cycle track through the precinct is being constructed.

#### Hotel, cafes and restaurants

The boutique five star hotel will be developed and operated by award winning hotel owners and operators Asian Pacific Group as their flagship property. Asian Pacific Group operates the 'Art Series' hotels and a portfolio of properties in Victoria, South Australia and Queensland. Although forming part of the development, the hotel will hold its own Commercial Hotel Licence.

The historic wharf buildings on the site are rare evidence of the pre-1940s Port of Brisbane. They have been unused for more than 20 years. These heritage buildings and wharf will be carefully converted into new restaurants and cafes run by some of Australia's leading operators.

There is a strong focus on making food on site with seasonal menus making use of the produce.

A craft brewery will add to the attraction of the precinct and Brisbane's growing reputation for quality craft brewing.

The air-raid shelters will be features of the landscaped public open space.

A place to play

Low scale development and a \$17 million landscaping budget will turn Howard Smith Wharves into a new riverside meeting place for residents and visitors with grassed play areas, gardens, a walking track and dedicated cycle path.

A range of events will be scheduled to make the open space an active destination.

An educational program is planned around the history of the site and sustainable urban practices.

Improved lighting, CCTV and activation will improve public safety in the area.

# A landscape for the people

Howard Smith Wharves' open space is an opportunity to create a unique inner city green space, with an edible landscape.



de la



Urban agriculture will be a focus, creating fresh produce for use at the restaurants and cafes throughout the precinct.

It will complement a range of other 'real food' activities on site – bread making, coffee roasting and beer brewing at the craft brewery.

#### Interaction with the river

In keeping with Brisbane City Council's "River's Edge" strategy, Howard Smith Wharves will be a place to engage with the river, with fun, water-based activities, stages for entertainment, dining and berthing facilities.

Brisbane City Council completed construction of the restoration of the 170 metre long timber wharf beneath Story Bridge in March 2013.

The restoration included structural repairs which make the area safe for public access and captures the site's history as a working wharf.

A ferry terminal and marina are not included in the initial stage of work but have been considered in the design process.

#### **Events**

Opening in late 2017/early 2018, Howard Smith Wharves will be Brisbane's newest and most exciting riverfront event space.

With remarkable views of the Story Bridge and city skyline, and an impressive portfolio of event spaces, Howard Smith Wharves is Brisbane's ultimate venue for every kind of special event. The precinct features two unique event spaces and unrivalled options for outdoor events, from rooftop terraces, pop up marquees and intimate private venues amongst the cliffs.

Howard Smith Wharves can cater for as little as 10 or as many as 1000 people at each event, with the core philosophy of showcasing the best of Queensland's food and drink. With onsite parking and accommodation, the cutting edge event spaces are suitable for conferences, trade shows, meeting, gala dinners, Christmas parties, intimate corporate dinners, team-building events, weddings, social events and private celebrations.

Steps such as sound proofing, appropriate management of ingress and egress, tasteful choices of signage and forward planning for the overall site should ensure the amelioration of any perceived negative impact of the development on the area. The ambience will suit the residential developments in the area whilst adding to the cosmopolitan nature of the CBD. Therefore the granting of the application is clearly in the best interests of the community.



### 3. Methodology

In the preparation of this report, Liquor & Gaming Specialists ("LGS") gathered information via the following sources and according to the following methodology:

- 3.1. Statistical information specific to the locality in which the relevant premises is situated was obtained from the Australian Bureau of Statistics and from the local authority for the area. Specifically, the following kinds of data were considered and reported upon:
  - Total population
  - Age breakdown
  - Weekly individual income levels
  - Employment
  - Occupation
  - Housing prices and rental rates
  - Growth

Ser.

- Tourism
- 3.2. Data was obtained from the Liquor Licensing Division in relation to existing numbers of licensed premises and the movement of licences within the locality.
- 3.3 Site specific information in relation to trading practices, service types and levels, premises layout, marketing activity and so on was obtained via detailed interviews and discussions with the applicant.
- In terms of the assessment, we have made certain assumptions based on our own experience and knowledge of the area, but have nevertheless drawn from the new guideline the following key indicators:
  - Profile of the local community area including social and demographic profile and tourism
  - Number and distribution of existing licensed premises
  - Location of sensitive facilities
  - Health and social impact criteria including:
    - impact on local community
    - vulnerable groups
    - noise, traffic, vandalism, litter, crime and other amenity considerations
    - employment creation
    - safety issues
    - potential change in character of local area



- trading hours
- Nature and type of facilities to be provided distinction between this and other facilities in the area
- 3.5 Research was undertaken with respect to each of these items, and the resultant data analysed and compared with known benchmarks. Both positive and negative outcomes have been identified and reported, and in appropriate cases, ameliorative strategies have been recommended.
- 3.6. The relevant information and LGS's analysis and conclusions appear in the body of this report in accordance with the table of contents.



(



### 4. Local community area profile

### 4.1 Delineation of local community area

In Cosimo Riggio v Chief Executive (unreported decision of the Liquor Appeals Tribunal 13 August 1999), the Liquor Appeals Tribunal indicated the following in relation to locality:

In order to determine whether the "reasonable requirements" specified in s.116(2) are satisfied, it is necessary first to determine the reasonable boundaries of the "locality to which the application relates". The relevant locality can, in the Tribunal's view, be defined as an area in which a hotel is likely to exert an influence on liquor trading characteristics. In order to determine the relevant locality, it is necessary to have regard to the nature of the proposed premises, the services which are to be offered, and any geographical or man-made boundaries which will affect the influence any premises will have on a locality.

#### It is noted that Guideline 38 states:

For the purpose of this guideline the area that may be affected by a licence is called the "Local Community Area". It is insufficient to examine community impact in relation to the catchment area or primary trade area. The meaning of "Local Community Area" is considered synonymous with the term "locality" as used in the Liquor Act.

Local Community Area is defined as the community most affected by the application. The boundaries of the Local Community Area will normally be defined by examining the following factors:

physical proximity to the proposed licence; the presence of natural or human made boundaries that effectively separate one local community from another; the perception of the local community and/or key advisers relevant to that community.

These considerations clearly follow the precedents established in numerous earlier cases.

The local community area has been identified for the purpose of the Community Impact Statement as the Brisbane City ABS State Suburb.

# 5. Social profile of the local community area

# 5.1 Description of the local community area

Brisbane City roughly equates to the local community area suggested in Guideline 38. The area is bounded by the Brisbane River to the East, South and West and Roma Street/Countess Street/College Road/Wickham Terrace/Wharf Street/Boundary Street to the North.





### 5.2 Population

Statistics obtained from the Australian Bureau of Statistics estimate that the total residential population of Brisbane City as at the 2011 Census was 7,888.

The average annual growth rate from 2006 to 2011 was 0.8%.

It is also noted that many thousands of workers attend the Brisbane CBD on a daily basis. The majority of these persons would reside outside the CBD and would therefore also contribute to the population base that would be serviced by licensed venues in the CBD.

The following statistical information is derived from the ABS data regarding the Brisbane City State Suburb. The table includes statistics from the 2006 and 2011 Census.

Population Census 2006	Population Census 2011	% Growth	
7590	7888	3,9	

The following table provides a percentage breakdown of selected characteristics for the locality based on information obtained from Australian Bureau of Statistics Census 2006 Tables B01a and B04:

	Brisbane City (%)	Queensland %
Total Persons	7888	4332739
Persons Aged 18 years and over	7443 (94.4%)	75.7%
Aboriginal and/or Torres Strait Islander	26 (0.3%)	3.6%
Australia Born	2630 (33.3%)	73.7%
Born Overseas	3855 (48.9%)	20.5%

Due to its CBD nature, the profile disclosed in the above table varies notably from the State with a higher percentage of the population being over the age of 18 years, a lower percentage of Aboriginal/Torres Strait Islanders and a higher percentage of overseas visitors. All of these variations are favourable to the application suggesting a greater than average level of demand for licensed premises such as that proposed by the applicant, and a lesser likelihood of impact upon a vulnerable segment of the community.





#### 5.3 Selected medians

The following medians are based on Census 2011 data:

	Brisbane City	Queensland
Median Age	29	36
Median individual income (\$)	\$859	\$587
Median household income (\$)	\$1828	\$1235
Average household size	2	2.6
Median weekly rent	\$530	\$300
Median monthly housing loan repayment	\$2400	\$1850

The statistics suggest higher levels of individual and household income than the average for the State. The majority of Brisbane City residents are aged between 20 to 29 years; as a demographic they make up over 41% of the population. The dominance of this age group suggests high numbers of students and young professionals. This would tend to imply that the approval of the application would not have any detrimental impact upon individual or family income in the local community area. The conclusions which can be drawn from the data generally and any relevant deviations are also supported by an application of Guideline 38 criteria to the risk assessment data, which follows.

In any case, it appears that the proposed application should not to be affected adversely by a consideration of age, income or household size statistics.





### 6. Community risk assessment data

Section 7 of Guideline 38 requires a consideration of specific data in relation to identified risk indicators. These are set out in the table below. Comparative statistics for Queensland are provided to determine if there is a relatively higher proportion of residents in any of the groups.

Section 7 of the Guideline defines "relatively higher proportion" as 5 or more percentage points higher than Queensland as a whole.

Description	Brisbane City %	Queensland %	Weighting
Persons aged 15 years and over with no qualifications	46.9	56.7	0
Aboriginal or Torres Strait Islander people	0.3	3.6	0
Recent migrants from non-English speaking countries	1.2	0.08	0
Occupied private dwellings with two or more families	Not available	Not available	0
Households renting	54.5	33.2	0.5
One parent families with dependent offspring	5	11	0
Male (in labour force) unemployed	6,9	6.1	0
Females (in labour force) unemployed	7.3	6.1	0
Employed males classified as 'labourers and related workers'	7	12.7	0
Employed females classified as 'labourers and related workers'	6	8.2	0

Each of the groups is assigned a weighting to determine the risk factor for the community and the community is considered to be at risk if the total score is 8 or more.

The total score for Brisbane City is 0.5. Therefore, for the purposes of assessing community impact, the community is not considered to be at risk. The higher rental figures can be attributed to the CBD nature of the locality. Much of the real estate purchased in the area is for investment purposes.





### 7. Likely health and social impacts

### 7.1 Number and type of facilities to be provided

The number, distribution and condition of existing licensed premises in the locality, as well as the extent and quality of services are discussed in Sections 7.14, 7.15 and 7.16 of this report.

The type of facilities to be provided at Howard Smith Wharves discussed in the introduction to this report at Pages 3, 4 and 5. Of the other licensed premises considered in this report, none appear to provide the unique atmosphere and facilities proposed for Howard Smith Wharves. Patrons will be attracted to the premises by the quality and standards in place.

# 7.2 Impact on the local community as a whole

The demographic characteristics of the locality indicate that groups vulnerable to the adverse impacts of liquor are at percentage levels below that of the State. The conclusion drawn from this is that the approval of the licence has a low risk of adversely impacting upon the locality.

The positive impacts include:

- An added level of diversity and quality in licensed venues within the locality which will benefit residents, workers, visitors and tourists of the city.
- A suitable style of venue for the residents of and visitors to the locality
- The increase of commercial activity in the immediate vicinity of the premises which benefits nearby businesses.
- Economic benefits through further job and wealth creation.

# 7.3 Impact on vulnerable groups

The absence of sensitive facilities in the immediate vicinity of the premises, and our experience with communications with the various community agencies in the area also tend to suggest that the application should not be compromised by the presence of any vulnerable groups.

The demographic analysis undertaken indicates only positive deviations from the State norms which further supports this conclusion.

# 7.4 Noise/amenity

(

The venue will be acoustically treated to appropriate standards. Provided these levels are maintained, there will be no noise impacts on residents of the locality.

The premises is situated within the CBD which is dominated by commercial uses including bar, dining, cultural, recreation and entertainment. The construction of the building and its position in relation to nearby residences, do not indicate that there will be any noise concerns which could not be adequately addressed through sound management practices. It is expected that this will be consistent with the findings of acoustic reports which will be lodged with OLGR upon completion. It appears to be a relatively safe conclusion to draw that the operation of this premises will not have any adverse impact upon the locality.





Being located in the CBD the venue is well serviced by public transport. Considering the volume of traffic in the locality at present, it is safe to say there will be little or no impact on traffic conditions as a result of the proposed development.

### 7.5 Employment created

There will be some employment creation resulting from the proposal. Employment opportunities will include managerial positions, kitchen and bar staff, waiting staff, security and administrative personnel.

## 7.6 Cultural and recreational benefits

The premises does not make any specific contribution to the broadening of the cultural diversity of the CBD as the operation of the premises will not be restricted to the promotion of a particular cultural identity. The applicant intends to foster a broad based suited to its central riverfront location.

## 7.7 Benefits to the local community

As has been noted throughout this report, there does not appear to be any basis for a conclusion that there will be an adverse or negative impact upon the local community.

Positive impacts are readily identifiable with the added diversity and quality of venues if the proposal proceeds. These include social and recreational opportunities for persons in the area and economic benefits through job and wealth creation.

#### 7.8 Tourism benefits

Brisbane is a popular destination for tourists and continues to grow in visitor numbers. There were 6,479,000 international and domestic overnight visitors to Brisbane in the year ended June 2015, this was an increase of 5.5% on the year ended June 2015.

Of these, 29% were holiday visitors (down 3.8%), 41.5% were visiting friends and relatives (up 7.5%), and 21.5% were business related (up 21.6%).

The number of visitor nights to Brisbane increased 4.7%, in proportion to the increase in the number of visitors, This meant the average length of stay remained the same overall, however the large increase in business travellers increased their average stay.

The net result was a larger proportion of higher yielding business travellers to Brisbane, which drove a 6.7% increase in total domestic expenditure to a record \$3.4 billion.

A strong increase in the average length of stay of international VFR travellers was able to offset a decline for holiday visitors and slight declines in education and employment. The overall result was an increase of 3.8% in average length of stay for international visitors.

The strong increase in visitors and the lift in average length of stay combined to increase overall international visitor expenditure by 16.8% to a record \$1.8 billion.





Clearly the tourism industry is a major revenue earner for the State and Brisbane plays an important part in the state's tourism framework. Projects such as the applicant's create an improved destination for the recreational and entertainment pursuits of those visiting the area. The addition to the diverse range of licensed special facilities in the CBD will assist in achieving the desired outcomes for the area.

The applicant's premises is situated and designed to meet the public demand, both local and tourist, for better activities and attractions, and accommodation, dining and recreation facilities.

Therefore, the proposed facility will meet the reasonable requirements of visitors for liquor and related services.

### 7.9 Impact on traffic

The impact on traffic is likely to be minimal. Considering the volume of traffic in the locality at present, it is reasonable to suggest that any marginal increase in traffic levels are more than able to be accommodated by the roads that pass the site.

### 7.10 Safety Issues

The safety and security requirements for licensed premises of this kind are guided by several obligations. These include:

- Section 148A(4) of the *Liquor Act 1992* and Section 41 of the *Liquor Regulations 1992* (which in aggregate establish a statutory obligation to provide a safe environment for patrons);
- The obligation to diligently ensure compliance with the general requirements of licensees pursuant to the Liquor Act 1992, and licence conditions; and
- Duty of care obligations under the common law.

Consistent with these broad requirements, the applicant will ensure an appropriate security regime, and appropriate numbers of adequately trained personnel.

Safety is enhanced by the expected high level of activity in the area, creating casual surveillance, and people attending the range of services offered in the area. There is also sufficient lighting to assist in this regard.



Yang.



### 7.11 Impact on character/identity of the locality

The proposed premises is located in the CBD. The commercial centres of most regions throughout Queensland have significantly higher concentrations of licensed premises than the surrounding community which they support. Many residents of a population centre resort to these precincts for their entertainment and recreational pursuits precisely for this reason as it gives them a much greater selection of venues and the precinct serves as a central location to meet. The CBD has one of the highest concentrations of licensed premises in Queensland, and this is an accepted (and expected) feature of the locality's character.

The operation of the proposed premises is consistent with the character of the area and will contribute to and enhance that character.

## 7.12 Proximity to community sensitive facilities

The definition of sensitive facilities and the vicinity of the site are taken from OLGR's Guideline 38: Community Impact Statements.

Our investigations indicate that there are no sensitive facilities in the immediate vicinity of the premises.

### 7.13 The impact of trading hours

The applicant has requested approved trading hours to 1.30am daily. This is conservative for the CBD. For example, there are 39 Commercial Hotel Licences in the CBD, 21 of which have approved trading hours to 3.00am. There are also 6 Nightclub Licences with approved trading hours to 3.00am. Therefore, as the majority of bar and entertainment venues in the CBD operate beyond 12midnight, there will be an expectation of Howard Smith Wharves patrons and the venue performers that they should be able to remain in the premises until at least 1.30am as they could at most other bar and entertainment venues. These legitimate expectations of the applicant's patrons' and performers' have been created by administrative decisions to grant 3:00am trading in the immediate area and throughout the CBD.

In order to provide a venue of the highest quality, consistent with Brisbane's developing reputation as one of Australia's premier entertainment precincts and breeding grounds for Australian musical talent, flexible trading hours are necessary to meet the expectations of patrons and performers, and to allow the venue to operate at its optimum level of service. Given the prevalence of bar and entertainment venues in Brisbane which have authority to operate until 3.00am, with Howard Smith Wharves providing a superior venue to many in terms of its overall quality as a bar, dining and entertainment venue, including the quality of its management and security, it is only fair that it be permitted to compete on a level playing field with other, perhaps less desirable venues.

The proposed trading hours are designed to improve flexibility and services. This will result in the premises being able to more adequately and completely meet the needs of its clientele for late night food, liquor, entertainment and related services. It will also allow the applicant to attract higher profile musical talent.

With the commercial activity of these other licensed premises, it is highly unlikely that the operation of the proposed premises would have an adverse impact upon the amenity of the locality. The control of any possible adverse impacts has been addressed above.





# 7.14 Number, distribution and condition of existing licensed premises

There is only one Commercial Special Facility Licence in the CBD, namely Customs House. The nearest other Special Facilities are The Barracks, South Bank Parklands and Portside Wharf.

As mentioned above there are also 39 Commercial Hotel and 6 Nightclub licences in the CBD. The number and distribution of venues reflects the entertainment nature of the area in question, with high concentrations of licensed premises of varying descriptions.

Over recent years, the standard of licensed venues has risen quite perceptibly. Older hotels have systematically been renovated and refurbished, and new trendy nightclubs and bars being added to the area.

The premises in its proposed form will be unique world-class riverfront destination.

# 7.15. The extent and quality of services currently provided in the area

As the population of Brisbane and its surroundings continues to grow rapidly, so too does the entertainment and nightlife scene. Whilst the population of Brisbane may not be the magnitude of that in Sydney and Melbourne, the nightlife landscape has expanded significantly in the last decade. The arts culture in Brisbane is flourishing in all its varieties, from international stage acts to a plethora of eateries and nightclubs encompassing everything from jazz to a burgeoning dance music scene.

The applicant's style of services proposed are well suited to the immediate precinct of the premises and will respond to public demand. The applicant is an experienced and successful operator and the proposed Commercial Special Facility Licence will be another complementary addition to the diverse recreational, bar, dining and entertainment culture of the CBD.

# 7.16. Concentration of licensed venues in the locality

As has been discussed earlier, there is an expectation of residents and visitors to Brisbane that the CBD would provide a diverse range of facilities. A significant majority of tourists are highly unlikely to see parts of Brisbane other than the tourist attractions and the inner city areas, and are more likely than not to resort to the Valley or CBD when seeking licensed venues for recreational pursuit. Consequently, the concentration of licensed venues in the CBD whilst high, is not when considered in the correct context at saturation level or at a level which is having detrimental consequences in the locality.

# 8. Survey consultation in the local community area

It is noted that community consultation has been carried out on numerous occasions in the CBD and due to this, OLGR have not required consultation for certain applications of this type over recent times. It is noted that the development has already undergone a highly scrutinised impact assessable material change of use application which involved public advertising and consultation with referral agencies and was subsequently approved subject to a range of operational conditions. If consultation is required, the results will be provided in a supplementary report.





#### 9. Conclusion

The location of the premises in the CBD and the distinctive nature of the facilities to be offered, combined with the substantial growth which the area is experiencing, clearly demonstrate that the proposed development would be in the public interest and have a positive community impact, absenting any specific concerns relating to impacts upon vulnerable groups and facilities within the local community area.

As has been concluded above, there are no such sensitive facilities or groups of concern, and the analysis of the demographic profile of the area suggests that it is not at risk.

The available data supports the approval of the application on the basis of the community impact criteria set out in OLGR guidelines. In summary:

- There is an identifiable need for the licence proposed.
- There are no identifiable or demonstrable negative impacts which would occur as a consequence of the approval of the licence.
- Sensitive facilities in the area are not in a proximity which would cause any direct impact upon patrons of the agencies or the applicant's premises.
- The venue is suitable for the type of licence sought.
- The approval of the licence is generally in the interests of the local community

On the basis of the analysis and consultation undertaken, the application should therefore not be refused on the basis of community impact considerations.