

APPLICATION FOR THE CONDITIONAL GRANT OF A TAVERN LICENCE

FROTH CRAFT BREWERY GERALDTON

Craft Beer Taphouse & Family-Friendly Hospitality Venue

PUBLIC INTEREST ASSESSMENT

Applicant: Froth Craft Brewery Geraldton Pty Ltd

Trading Name: Froth Craft Brewery Geraldton

Premises: 1 Cathedral Avenue, Geraldton WA 6530

Licence Type: Tavern Licence

Authority: Director of Liquor Licensing, Western Australia

Prepared: September 2026

Prepared in support of an application under the Liquor Control Act 1988 (WA)



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1. Introduction and Background

This Public Interest Assessment (PIA) has been prepared in support of an application by Froth Craft Brewery Geraldton Pty Ltd (ABN 64 857 635 694) for the grant of a Tavern Licence in respect of premises trading as **Froth Craft Brewery Geraldton**, located at 1 Cathedral Avenue, Geraldton WA 6530 (the Premises), pursuant to the *Liquor Control Act 1988* (WA) (the Act).

This assessment has been prepared in accordance with the requirements of the Director of Liquor Licensing and addresses the matters set out in section 38(4) of the Act. It demonstrates that the grant of the proposed licence is in the public interest, having regard to the nature and character of the proposed venue, the characteristics and needs of the local community, and the expected impact on the wellbeing of the community in the locality of the Premises.

The proposed venue is a craft brewery taproom and dining venue, offering a premium, family-friendly hospitality experience anchored to a proudly Western Australian craft beer brand. Froth Craft Brewery was established in Exmouth in 2016 and commenced trading in 2017 and has since expanded to Bunbury, North Beach (Perth), and now proposes to open its fourth venue in Geraldton, the regional capital of Western Australia's Mid West region.¹

The grant of the proposed licence will contribute meaningfully to Geraldton's hospitality and tourism offering, provide employment and economic benefit to the local community, and demonstrate a model of responsible liquor service consistent with the harm minimisation objectives of the Act.

1.1 Legislative Framework

The *Liquor Control Act 1988* (WA) (the Act) provides the legislative framework governing the sale and supply of liquor in Western Australia. The objects of the Act, as set out in section 5, include to minimise harm or ill-health caused to people, or any group of people, due to the use of liquor; to cater for the requirements of consumers for liquor and related services, with regard to the proper development of the liquor industry, the tourism industry and the economy of the State; and to facilitate the use and development of licensed facilities, including facilities provided for the benefit of the tourism industry of the State.²

The Butterworth's Australian Legal Dictionary defines the term "public interest" as:

"an interest in common to the public at large or a significant portion of the public and which may, or may not, involve the personal or proprietary rights of individual people."

The public interest is also to be consistent with the primary and secondary objects of the Act.

The primary objects of the Act (section 5(1)) are:

1. to regulate the sale, supply and consumption of liquor;
2. to minimise harm or ill-health caused to people, or any group of people, due to the use of liquor;

3. to cater for the requirements of consumers for liquor and related services, with regard to the proper development of the liquor industry, the tourism industry and other hospitality industries in the State.

The secondary objects of the Act are:

1. to facilitate the use and development of licensed facilities including their use and development for the performance of live original music, reflecting the diversity of the requirements of consumers in the State; and
2. to provide adequate controls over, and over the persons directly or indirectly involved in the sale, disposal and consumption of liquor; and
3. to provide a flexible system, with as little formality or technicality as may be practicable, for the administration of the Act.

Liquor is defined in the Act as a substance intended for human consumption which at 20 degrees Celsius contains more than 1.15% ethanol by volume, or such other proportion as is prescribed.

This PIA addresses all relevant aspects of the public interest in accordance with the Liquor Control Act 1988 (WA) ('the Act') and the licensing authority's current Public Interest Assessment requirements, last updated 25 August 2026. The Applicant has also had regard to applicable requirements of the City of Greater Geraldton. The level of detail required for a PIA is unique to each application, and this Assessment has been prepared accordingly. The Department of Local Government, Industry Regulation and Safety (LGIRS) has published guidance on the preparation of PIAs, which has been followed in the preparation of this document.³

Section 38 of the Act requires the licensing authority to have regard to whether the grant of the application is in the public interest. Section 38(4) identifies the factors to be considered, including the effect on the amenity of the locality; the opportunity for community participation in sporting, recreational, cultural or educational activities; the tourism, community and cultural benefits; the need of the community for the provision of services; and the extent to which the proposed venue will contribute to or detract from the wellbeing of the community in the locality.

2. The Applicant

2.1 Applicant Details

Applicant Information	
Entity Name	Froth Craft Brewery Geraldton Pty Ltd
Trading Name	Froth Craft Brewery Geraldton
Licence Type Sought	Tavern Licence
Premises Address	1 Cathedral Avenue, Geraldton WA 6530

Postal Address	1 Cathedral Avenue, Geraldton WA 6530
Contact	Pete Firth - 0420 228 104 - pete@frothcraft.com

2.2 Background of the Applicant and Brand

APPLICANT

Froth Craft Brewery Geraldton is owned and operated by directors Tyler Little, Phil Gray, Neil Rae, Peter Firth and Tyson Overstone.

The four directors (Little/Gray/Rae/Firth) are also the directors of Froth Craft Brewery Exmouth, Froth Craft Brewery Bunbury and Froth Craft Brewery North Beach:

- Little Phete Pty Ltd trading as Froth Craft Brewery Exmouth (ABN 21 578 763 582) under Tavern Licence no.602210985917. This venue started trading on 23 February 2017. Among others, this venue won A.H.A (W.A) Awards 2019 Best Boutique Brewery, Best Regional Venue and Best Outdoor Area.
- Froth Bunbury Pty Ltd trading as Froth Craft Brewery Bunbury (ABN 79 380 346 113) under Tavern Licence no.6020041236. This venue started trading on 8 July 2022. Among others, this venue won A.H.A (W.A) Best Craft Brewery Award 2024 and Best New Venue Award 2023.
- Froth Craft Beach Pty Ltd trading as Froth Craft Brewery North Beach (under Tavern Licence no. 602222650424). This venue started trading on 14 December 2023 under a Small Bar Licence and was granted a Tavern Licence on 21 February 2025.

Froth Craft Brewery was founded in 2016 in Exmouth, Western Australia, where it operated as the first microbrewery between Perth and Broome.⁴ It started trading on 23 February 2017. The brand was built on a philosophy of producing accessible, high-quality craft beer in a family-friendly venue environment that celebrates the Western Australian lifestyle.

Since its founding, Froth Craft Brewery has grown significantly. The group has expanded to include award winning venues in Bunbury (South West W.A) and North Beach (Perth), establishing a proven track record of responsible venue operation, positive financial growth, local employment provision and community integration. Geraldton represents the group's fourth location and its first venture into the Mid West region of Western Australia.

The Froth Craft Brewery brand is characterised by:

- A focus on craft beer produced with quality local and national ingredients;
- A family-friendly venue design that welcomes all members of the community;
- A commitment to responsible service of alcohol (RSA) as a core operational principle;
- A dining offering that complements the beverage offering and ensures food is available throughout trading hours;
- A strong connection to the local community and regional identity; and
- A demonstrated history of operating within the terms of relevant liquor licences without adverse incident.

The group has created over 200 beers to-date across its core range, seasonal releases, and limited edition offerings, encompassing but not limited to a wide variety of styles: lagers, pale ales, amber ales, sour beers, stouts and India Pale Ales.⁵ The diversity of the beer range ensures that the venue appeals to a broad spectrum of consumers while maintaining an emphasis on quality over volume.

Froth Craft Brewery was recognised on the national stage at the 2026 Australian Independent Beer Awards, held in Melbourne, when it won the Best New Exhibitor Award; along with 11 medals for the following products:

- GOLD: The Captain Lager, Gimme 'MO Stout
- SILVER: Sukoshi Rice Lager, The Local WA Pilsner, Lobo Dark Lager, Stoned Over Hazy Pale, Cheech Hazy IPA
- BRONZE: Opi Festbier, Frothy D Draught Lager, Hopmouth XPA, Plead the Fifth IIPA

The Applicant is committed to the highest standards of responsible hospitality management and will implement comprehensive Responsible Service of Alcohol (RSA) policies, security procedures, and management practices at the Geraldton premises. These are described in detail in Section 5 of this Assessment.

3. The Premises

3.1 Location and Description

The proposed Premises is located at 1 Cathedral Avenue, Geraldton WA 6530, situated on the corner of Cathedral Avenue and Foreshore Drive in the Geraldton city centre. The site was formerly occupied by Skeetas Restaurant Bar & Café, a well-established hospitality venue that operated at the Foreshore Drive location for many years prior to its closure.

The Premises occupies a prominent position within the Geraldton CBD, situated immediately adjacent to the Geraldton Foreshore and the Batavia Coast Marina precinct. The location provides direct visual and physical connection to the waterfront, placing the venue within the heart of Geraldton's tourism and dining precinct.

The proposed venue comprises:

- An indoor area incorporating a taproom, bar and dining space;
- An outdoor beer garden incorporating a kids' playground space
- Ancillary kitchen, coolroom, amenities, storage and service areas.

The indoor and outdoor areas together create a venue that caters for both intimate dining and casual socialising, consistent with the family-friendly positioning of the Froth Craft Brewery brand across all of its venues.

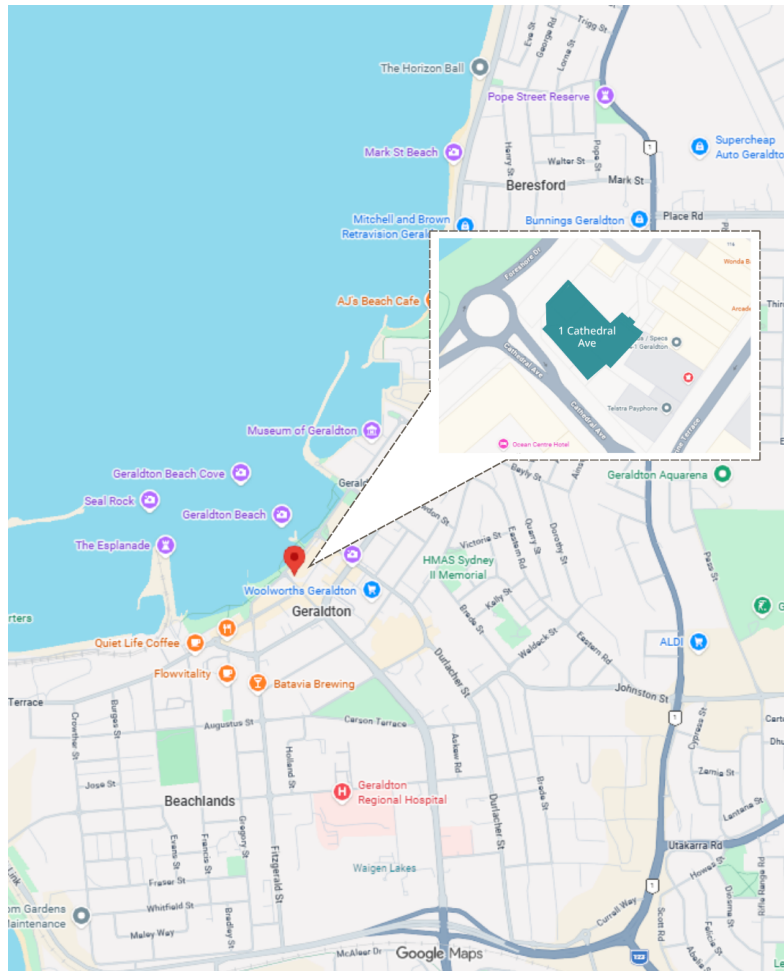


Figure 1. Location of the Premises within Geraldton CBD and Foreshore Precinct.

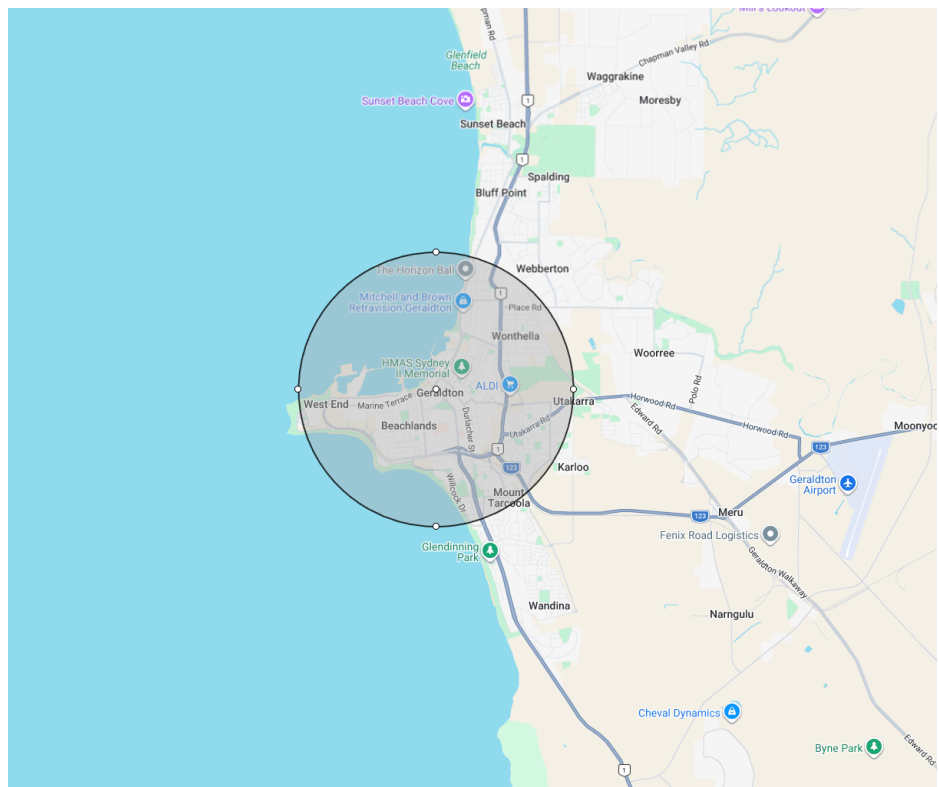


Figure 2. Geraldton and 3 km radius of the Premises (Source: Google)

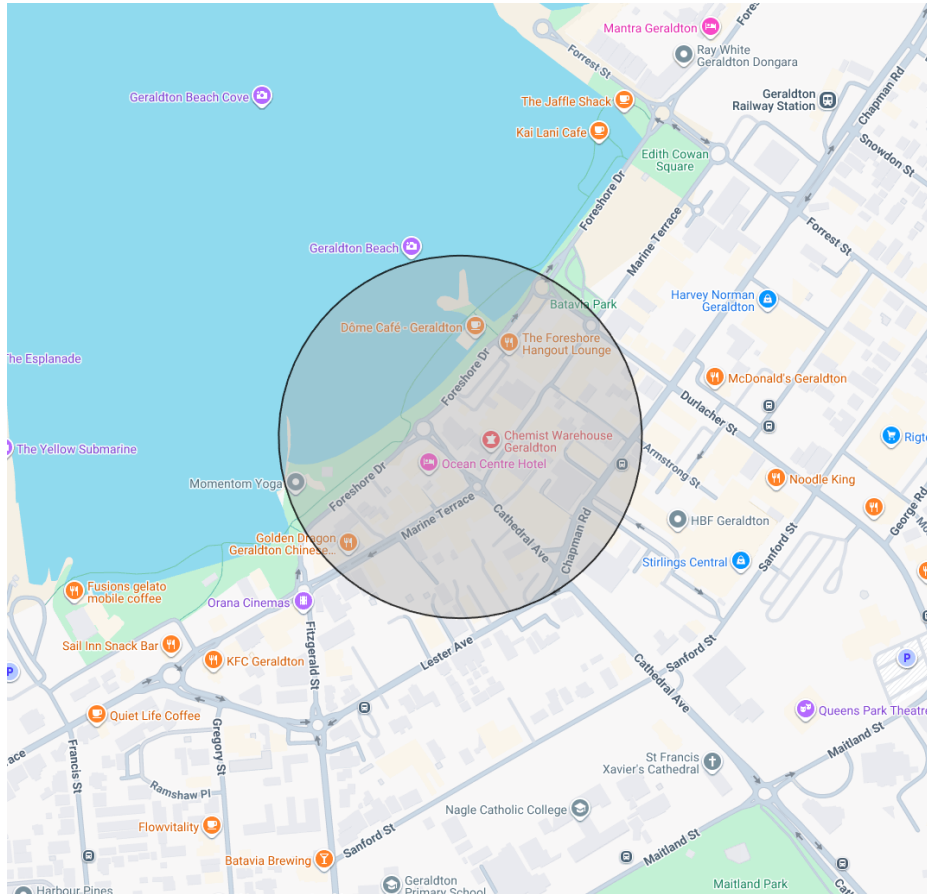


Figure 3. 1 Cathedral Ave and 220m radius of the Premises (Source: Google)



Figure 4. 1 Cathedral Ave Building Premises (Source: Google)

3.2 History of the Site

The site at the corner of Cathedral Avenue and Foreshore Drive has a long history of hospitality use in the Geraldton community. Skeetas Restaurant Bar & Café occupied the Foreshore Drive address from approximately 1992 - 2013 and was one of Geraldton's most recognised hospitality venues, trading for a significant period as a licensed restaurant and bar before ceasing operations. The historical use of the site is accordingly well-known to the Geraldton community as a prime location for a licensed hospitality premises.

The proposed development by Froth Craft Brewery Geraldton Pty Ltd represents a continuation and revitalisation of the hospitality use of the site, bringing a nationally recognised craft beer brand to a location that has historically served the Geraldton community in a licensed capacity.



Figure 5. Original Skeetas Restaurant & Cafe – Photo taken on 1 November 1996.

3.3 History and Significance of the Locality

Geraldton is the regional capital of the Mid West region of Western Australia, located approximately 424 kilometres north of Perth. The city has been the administrative, commercial and service centre of the Mid West region since European settlement in the mid-nineteenth century.⁶

The Geraldton city centre and foreshore precinct have undergone significant transformation over the past two decades, anchored by a \$40 million investment in foreshore redevelopment and city centre revitalisation.⁷ Key landmark developments have included the Batavia Coast Marina (Stage 1 completed March 2000), the Museum of Geraldton, the Bill Sewell Complex, the HMAS Sydney II Memorial, and the Champion Bay Foreshore Enhancement. These developments have collectively transformed Geraldton's foreshore from an underutilised industrial area into a vibrant public and tourism precinct that directly connects the city centre to the waterfront.

Cathedral Avenue itself is one of Geraldton's most significant thoroughfares. It traverses the CBD from the Geraldton Foreshore northward, passing the Cathedral of the Holy Cross (listed on the State Register of Heritage Places on 25 June 2004),⁸ the Geraldton Visitor Centre, and a range of commercial, hospitality and civic uses. The avenue is a primary route for both residents and visitors accessing the Geraldton foreshore and the Batavia Coast Marina.

The Geraldton Heritage Area is recognised as having significance because it maintains a maturity resulting from the existence of many older buildings, established landscaping and street trees.⁹ The proposed venue's location within this precinct makes it well-positioned to contribute to the area's character as a destination for dining, leisure and community activity.

The City of Greater Geraldton (CGG) is the local government authority with responsibility for planning and development in the area. CGG has an estimated resident population of approximately 42,322 as at mid-2024,¹⁰ making it the third most populous local government area in Western Australia outside of the Perth metropolitan area, following only Bunbury. The City generates an estimated annual economic output of \$8.259 billion.¹¹



Figure 6. Cathedral Avenue Precinct – Streetscape View. Photo taken on 15 March 2026.

4. The Application

4.1 Nature of the Application

Froth Craft Brewery Geraldton Pty Ltd seeks the grant of a Tavern Licence pursuant to the Liquor Control Act 1988 (WA) in respect of the Premises at 1 Cathedral Avenue, Geraldton WA 6530.

A Tavern Licence authorises the licensee, during permitted hours, to sell liquor on the licensed premises for consumption on the premises and, unless the licence is restricted, to sell packaged liquor on and

from the premises. The Applicant's proposed manner of trade, including its limited takeaway liquor model, is addressed in Section 4.2.

4.2 Suitability of a Tavern Licence

The Applicant has considered the licence category most appropriate to the proposed manner of trade and considers that a Tavern Licence best reflects the nature, scale and intended operation of Froth Craft Brewery Geraldton.

The Premises is proposed as a food-focused, family-friendly craft brewery, dining, entertainment and social venue. While substantial food will be available throughout trading hours, patrons will not be required or expected to attend principally for a meal. Patrons may attend for lunch or dinner, sample Froth craft beer, meet friends or colleagues, attend live entertainment, functions or community events, or otherwise use the Premises as a social hospitality venue. The target client base and anticipated manner of use are considered in greater detail in Section 5.

The proposed scale of the Premises is also relevant. The Applicant anticipates a maximum accommodation of approximately 300 persons, subject to final approvals and occupancy requirements. This capacity cannot be accommodated under a Small Bar Licence, which is limited to 150 persons. The proposed capacity reflects the overall size and range of facilities within the Premises, including indoor dining and taproom areas, an outdoor beer garden, children's playground, food service and spaces capable of accommodating entertainment, functions and events. The management of different patron groups and associated risks is considered further throughout Sections 5 and 7.

The proposed service model is another reason a Tavern Licence is well suited to the Premises. Froth intends to adopt the same general style of service used at its existing Exmouth, Bunbury and North Beach venues, all of which operate under Tavern Licences. Patrons generally order food and beverages directly from the bar rather than receiving conventional table service. Food orders use a buzzer or similar notification system, with patrons collecting completed meals from the kitchen collection point. The Applicant's experience is that this provides an efficient service model for larger casual hospitality venues, particularly during busy periods.

This model is also an intentional part of the Froth experience. The bar is designed as a central visual and social focal point rather than simply a service counter. Existing Froth venues incorporate distinctive reclaimed wooden boats and rustic materials into their bars, creating a warm and recognisable Froth environment. The Geraldton Premises is intended to continue this design philosophy.

The Applicant also prefers direct interaction between patrons and staff rather than reliance on QR-code ordering from tables. Ordering at the bar enables staff to engage with patrons, discuss the Froth beer range and food offering, answer questions and provide recommendations. This personal interaction is considered an important part of the Froth brand and particularly relevant to the craft brewery experience.

The service model also assists responsible service. Patrons seeking further liquor service will generally interact directly with trained bar staff, providing repeated opportunities to observe their presentation, speech, coordination and behaviour and assess whether continued service is appropriate. Movement through the Premises also provides additional opportunities for staff and management to observe patrons. These measures complement active floor supervision and the more detailed RSA, patron-monitoring and harm-minimisation measures addressed throughout Section 5.

Community consultation supports the broader style of hospitality this model is intended to provide. Of 1,096 respondents answering the question concerning desired services, facilities and initiatives, 775 (70.71%) selected a "Family-friendly and welcoming atmosphere", 772 (70.44%) selected live music and 691 (63.05%) selected a children's play area with activations and toys.

The anticipated manner of use is similarly broad. Of 1,120 respondents answering who they would like to visit with, 752 (67.14%) selected family and 512 (45.71%) specifically selected children, with respondents permitted to select multiple responses. Written comments also referred to a desire for a "family place with music and chilled vibe" and more broadly to food, families, live music, atmosphere

and contemporary hospitality. These matters, including the proposed response to family patronage and community expectations, are considered in greater detail in Section 5.

The Applicant does not suggest that the survey establishes a specific preference for bar ordering, buzzers or the absence of QR-code ordering, as those matters were not directly tested. Rather, the survey supports the broader social, welcoming and family-friendly environment which the Applicant's established service model is designed to provide.

A Tavern Licence is also appropriate because the beverage offering will extend beyond liquor manufactured by Froth. While at least 20 Froth craft beers are intended to be available on tap, the Applicant also proposes to offer wine, spirits and other beverages produced by third parties, providing appropriate choice for patrons who do not drink beer.

The Applicant does not, however, propose to operate a bottle shop or general packaged-liquor outlet. Takeaway liquor is intended to be limited to products manufactured by the Applicant or its associated entity, Froth Craft Brewery Bunbury, predominantly through growler fills of Froth craft beer. The Applicant does not propose to sell takeaway packaged liquor manufactured by unrelated third parties and would accept an appropriate licence condition giving effect to this restriction. The limited takeaway model and its relationship with existing packaged-liquor availability and potential alcohol-related harm are considered further in Sections 5 and 6.

A Tavern Licence also appropriately accommodates the entertainment, functions, community activities and special events intended to form part of the broader hospitality offering. The anticipated community and tourism benefits of these activities, together with their management and harm-minimisation considerations, are addressed further in Sections 5 and 7.

Importantly, the selection of a Tavern Licence does not mean that the Premises is intended to operate as a traditional alcohol-focused tavern or late-night drinking venue. Its proposed character is demonstrated by substantial food availability throughout trading hours, indoor and outdoor hospitality areas, a children's playground, low- and non-alcoholic beverages, entertainment and community activities, direct staff interaction, active management and a broad target clientele including families, couples, groups, residents and visitors.

The Applicant's associated entities already operate Froth venues under Tavern Licences in Exmouth, Bunbury and North Beach. The Applicant's directors therefore have practical experience operating this food-focused, family-friendly and bar-service model, including the management of substantial patron numbers, minors, entertainment, functions, outdoor areas, RSA and patron monitoring. This operating experience is relied upon throughout this Assessment where relevant to the Applicant's proposed harm-minimisation and management measures.

For these reasons, and having regard to the more detailed evidence concerning target clientele, community demand, family patronage, harm minimisation, locality, tourism and community benefits and trading arrangements addressed throughout this Assessment, the Applicant considers that a Tavern Licence most accurately reflects the proposed capacity, design, service model, liquor offering and broader hospitality function of Froth Craft Brewery Geraldton.

4.3 Proposed Operations

The proposed operations of Froth Craft Brewery Geraldton are consistent with the brand's successful operations at its existing venues in Exmouth, Bunbury and North Beach. The venue proposes to offer:

- A curated selection of (at least 20 at any given time) Froth Craft Brewery beers on tap; including a core range plus rotating seasonal and limited edition offerings;
- A wine, spirits and non-alcoholic beverage list;
- A food menu available throughout trading hours, ensuring that food is always available to complement the liquor offering;
- An indoor dining and taproom area suitable for families, couples and groups;

- An outdoor beer garden providing an al fresco dining and socialising environment with views of the Geraldton Foreshore precinct.
- A spacious outdoor kids' playground area; and
- A welcoming environment that caters to locals, tourists, families, business visitors and the broader community.

4.4 Hours of Operation

The proposed trading hours for Froth Craft Brewery Geraldton are set out in Section 7 of this Assessment.

5. Public Interest Assessment

5.1 Overview

This Assessment addresses the public interest considerations set out in section 38(4) of the Liquor Control Act 1988 (WA) and the Director of Liquor Licensing's current Public Interest Assessment requirements. The Applicant considers that the grant of a Tavern Licence for the Premises at 1 Cathedral Avenue, Geraldton is in the public interest for the following reasons:

Community Benefit: The proposed Premises will provide a food-focused, family-friendly craft brewery, dining, entertainment and social venue within the Geraldton CBD and foreshore precinct. Community demand, the proposed target client base, family patronage, community consultation and the facilities and experiences proposed at the Premises are considered in greater detail in Section 5.

Economic Benefit: The Premises is expected to create direct local employment, support local suppliers and service providers and contribute to economic activity within the Geraldton CBD and broader Mid West region. The Froth group currently employs 82 people across its existing venues in Exmouth, Bunbury and North Beach, comprising 19 full-time and 63 casual employees. Based on the Applicant's operational modelling and experience, the Geraldton venue is forecast to employ an average of approximately 30 people throughout the year, comprising 7 full-time and 23 casual positions across kitchen and front-of-house operations. This forecast takes into account anticipated seasonal variations in trade. The employment, local expenditure and broader economic benefits of the proposal are considered further in Section 5.

Tourism Benefit: The location of the Premises within Geraldton's CBD and foreshore precinct provides an opportunity to contribute to the city's hospitality offering, visitor experience and broader appeal as a destination within Western Australia's Coral Coast. The Applicant's proposed contribution to tourism, events, visitor activity and the activation of the CBD and foreshore precinct is considered in greater detail in Section 5.

Harm Minimisation: The proposed operating model incorporates food availability throughout trading hours, direct staff interaction with patrons, responsible service of alcohol practices, active patron monitoring, security and incident-management procedures, appropriate venue design and management of departing patrons. These measures are further detailed in the Applicant's Harm Minimisation Plan, which forms a governing operational document submitted with the Tavern Licence application. The relationship between the proposed Tavern Licence and this operating model is explained in Section 4.2, with relevant risks and mitigation measures also addressed throughout Sections 5, 6 and 7 of this Assessment.

Responsible Operator: The Froth group has established experience operating Tavern-licensed venues in Exmouth, Bunbury and North Beach, with no adverse licensing history at its existing premises. The relevance of this experience to the proposed Geraldton operation, including the management of RSA, families and juveniles, entertainment, functions, patron behaviour and amenity, is addressed throughout this Assessment where relevant.

Locality and Amenity: The Premises is situated within the Geraldton CBD and foreshore precinct. The existing licensed environment, nearby premises and sensitive uses, packaged-liquor availability, potential cumulative impacts and matters relating to the amenity, quiet and good order of the locality are considered in detail in Section 6.

Trading and Venue Management: The proposed trading hours, entertainment and functions, security, patron management and measures intended to minimise disturbance associated with the operation of the Premises are considered in Section 7. These matters are also relevant to the suitability of the Tavern Licence and proposed manner of trade described in Section 4.2.

These considerations are addressed in greater detail throughout the Assessment. In doing so, the Applicant has considered the characteristics and needs of the Geraldton community, including families and children, Aboriginal people and communities, workers, visitors and Geraldton's culturally diverse population. The Assessment identifies reasonably foreseeable risks relevant to these groups and the locality and sets out the operational and harm-minimisation measures proposed to address those risks.

5.2 Population

While the 2021 Census recorded 33,378 residents within the greater Geraldton (postcode 6530)¹², more recent evidence demonstrates that Geraldton has experienced significant population and migration growth in the years following the COVID-19 pandemic.

In July 2023, ABC News reported Regional Australia Institute data showing that Greater Geraldton had experienced a 395% increase in migration inflows over the preceding 12 months, placing it among the top five local government areas nationally for annual growth in migration inflows. At that time, City of Greater Geraldton Mayor Shane Van Styn stated that Geraldton's population had increased by approximately 5% to around 42,000 people in less than two years¹³.

Importantly, evidence indicates that the post-COVID migration trend has continued. In June 2026, the Geraldton Guardian reported data from the Regional Australia Institute's Regional Movers Index showing that internal migration to Greater Geraldton had increased by 69.1% in the 12 months to March 2026¹⁴. This provides more recent evidence that Geraldton continues to attract new residents from elsewhere in Australia.

The strength of Geraldton's population growth and demand is also reflected in the local housing market. In August 2025, REIWA reported that Geraldton was Western Australia's top-performing regional centre for house-price growth for the third consecutive quarter, with its median house price increasing by 26.8% in the year to June 2025. REIWA identified factors including employment opportunities, infrastructure investment and strong housing demand as contributing to the performance of the Geraldton market¹⁵.

More recent property data provides further evidence of the scale of change occurring in Geraldton. In February 2026, the Geraldton Guardian reported that Geraldton dwelling values had increased by 107.2% over the preceding five years¹⁶, meaning residential property values had more than doubled over that period.

Evidence of this change was apparent from the early stages of the COVID-19 pandemic. In November 2020, ABC News reported that Geraldton's rental market had tightened significantly, with the number of available rental properties falling 53% in one quarter and the residential vacancy rate falling below 1%¹⁷. This provides an early indication of the increased residential demand that subsequently became evident through population migration and property-market data.

The available evidence therefore indicates that Geraldton's population and residential demand have changed materially since the 2021 Census. The sustained movement of people to Greater Geraldton, combined with strong residential property demand, employment opportunities and investment in the region, indicates an expanding permanent population and an increasingly active regional centre.

This population growth is relevant to the proposed Froth Craft Brewery Geraldton, as an increasing permanent population creates additional demand for hospitality, dining, entertainment and social facilities and services.

5.3 Demographics

According to the 2021 Census data from the Australian Bureau of Statistics, there were 33,378 people living in the greater Geraldton (postcode 6530, W.A). Of these, 49.2% were male and 50.8% were female, comparable to the State figures of 49.7% male and 50.3% female, respectively. Children aged 0–14 years made up 19.6% of the population and people aged 65 years and over made up 18.1% of the population. The median age was 40 years, compared with 38 years across Western Australia.

Table 1. Age Groups in Geraldton, W.A and Australia

Age All people	6530, WA	%	Western Australia	%	Australia	%
Median age	40	N/A	38	N/A	38	N/A
0-4 years	1,930	5.8	161,753	6.1	1,463,817	5.8
5-9 years	2,222	6.7	172,654	6.5	1,586,138	6.2
10-14 years	2,371	7.1	171,377	6.4	1,588,051	6.2
15-19 years	2,096	6.3	153,263	5.8	1,457,812	5.7
20-24 years	1,836	5.5	158,817	6.0	1,579,539	6.2
25-29 years	1,980	5.9	176,045	6.6	1,771,676	7.0
30-34 years	1,965	5.9	196,312	7.4	1,853,085	7.3
35-39 years	2,056	6.2	200,904	7.6	1,838,822	7.2
40-44 years	2,033	6.1	178,589	6.7	1,648,843	6.5
45-49 years	2,165	6.5	174,632	6.6	1,635,963	6.4
50-54 years	2,317	6.9	173,622	6.5	1,610,944	6.3
55-59 years	2,211	6.6	162,778	6.1	1,541,911	6.1
60-64 years	2,133	6.4	150,667	5.7	1,468,097	5.8
65-69 years	1,781	5.3	132,186	5.0	1,298,460	5.1
70-74 years	1,576	4.7	115,196	4.3	1,160,768	4.6
75-79 years	1,109	3.3	78,012	2.9	821,920	3.2
80-84 years	821	2.5	53,115	2.0	554,598	2.2
85 years and over	771	2.3	50,106	1.9	542,342	2.1

The table above provides demographic data that supports the suitability of Froth Craft Brewery Geraldton's business model and its targeted customer demographics (see following section Target Client Base).

The 2021 Census data shows that the median age of residents within the greater Geraldton (postcode 6530) is 40 years, compared with the Western Australian median of 38 years. This indicates a substantial established and mature adult population within the immediate catchment of the proposed venue.

The age profile is particularly relevant to Froth Craft Brewery Geraldton's target client base. Residents aged 30–54 years account for approximately 31.6% of the 6530 population, representing more than 10,500 local residents within these five age brackets. The area also has strong representation among residents aged 45–64 years, with each of these age groups representing a higher proportion of the local population than the Western Australian average.

This demographic profile aligns strongly with Froth Craft Brewery Geraldton's intended target market of mature adults, both male and female, generally aged between 30 and 55 years. The venue's offering of locally produced craft beer, quality food, live entertainment and a comfortable social environment is designed to appeal to this demographic, while remaining accessible and welcoming to the broader adult community.

Accordingly, the Census data supports the proposition that there is a significant existing population within Froth Craft Brewery Geraldton's target demographic living in the venue's immediate catchment, providing a sound demographic basis for the proposed business model.

5.3.1 Target Client Base

Froth Craft Brewery Geraldton intends to appeal to a broad cross-section of the Geraldton community, with its core target clientele being mature adults, both male and female, generally aged between 30 and 55 years, together with families, couples, friendship groups and visitors to the region.

The results of the Applicant's community survey strongly support the suitability of this target market. Of the 1,195 respondents who answered the age question, 773 respondents (64.7%) were aged between 31 and 55 years. Further, 907 respondents (75.9%) were aged between 26 and 55 years. The largest individual age groups represented were those aged 31–35 years (17.66%), 36–40 years (16.40%) and 41–45 years (13.81%).

These results demonstrate that the proposal has generated particularly strong interest amongst the demographic that Froth Craft Brewery Geraldton intends to principally service. This is also consistent with the demographic characteristics of the surrounding community. As identified above, the median age of residents within postcode 6530 is 40 years, compared with a Western Australian median age of 38 years.

What is your age?

Number of responses: 1195

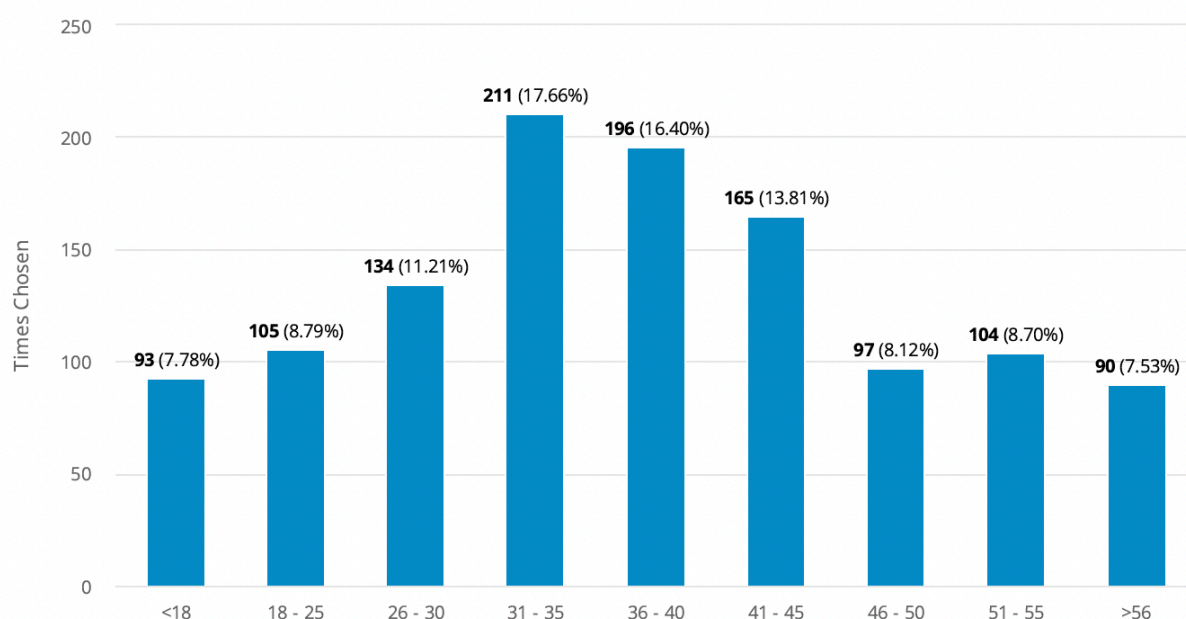


Chart 1. "What is your age?" question and answers in the Applicant's survey

The Applicant considers this demographic particularly suited to the proposed style of operation. Froth Craft Brewery Geraldton is not intended to operate as a conventional late-night drinking venue or nightclub. Rather, it will operate as a contemporary, experience-based, food-focused craft brewery and hospitality venue where patrons may meet for lunch, dinner or meals at any time with the All Day Menu, enjoy locally produced craft beer and other beverages, attend live music and community events, and/or socialise with partners, friends and family.

The age profile of survey respondents therefore supports the Applicant's expectation that a significant proportion of patrons will be mature adults visiting for a broader hospitality and social experience, rather than predominantly younger patrons attending principally for the consumption of liquor.

Importantly, the Applicant does not rely upon the age profile alone as a harm-minimisation measure. The proposed Tavern Licence necessarily requires consideration of the potential risks associated with the supply and consumption of liquor irrespective of patron age. Accordingly, the venue's operating procedures will include responsible service of alcohol practices, appropriately trained staff and management, active monitoring of patron behaviour and intoxication, substantial food availability, free drinking water, low- and non-alcoholic beverage alternatives, appropriate security and incident-management procedures, and the responsible management of entertainment and trading periods.

The Applicant's intention is to create an environment in which food, hospitality, social interaction, entertainment and locally produced craft beer collectively form the attraction of the premises, rather than liquor consumption being the predominant reason for attendance.

This position is further supported by the remaining community survey results, which demonstrate that respondents anticipate visiting Froth Craft Brewery Geraldton with partners, friends, family and children and across a broad range of daytime and evening trading periods. These results are considered further below.

5.3.2 Guests

The Survey provides further evidence as to the anticipated composition of patrons and the manner in which the community expects to use Froth Craft Brewery Geraldton.

Would you like to visit Froth Craft Brewery Geraldton:

Number of responses: 1120

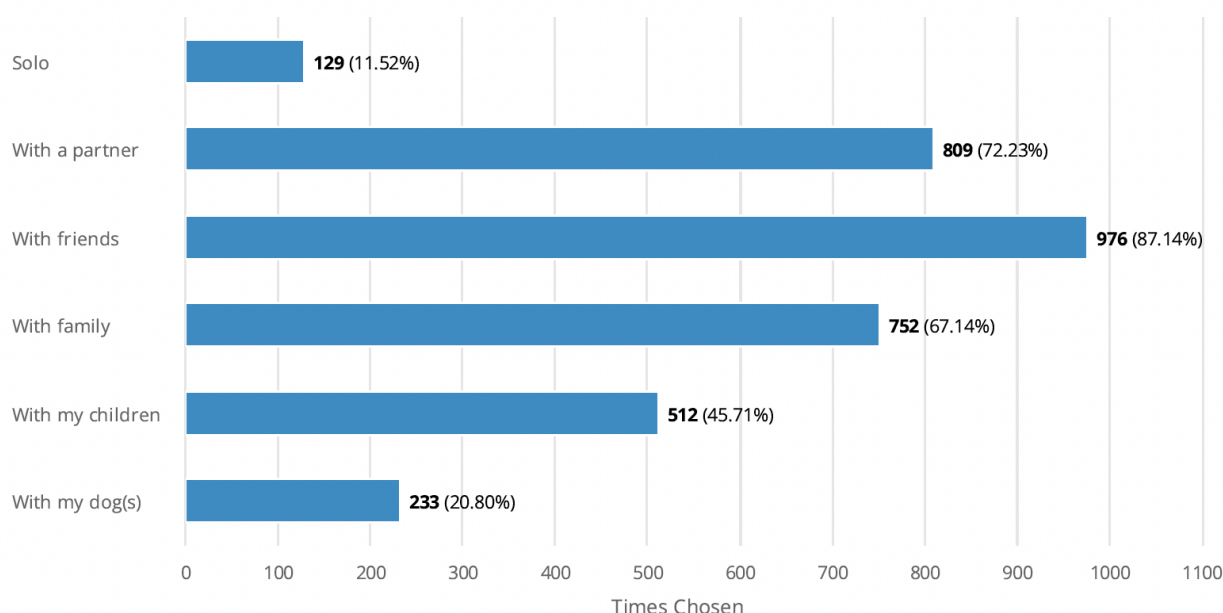


Chart 2. "Would you like to visit Froth Craft Brewery Geraldton?" question and answers in the Applicant's survey

When respondents were asked who they would like to visit Froth Craft Brewery Geraldton with, the results demonstrated a strong preference for attending the venue as part of a social or family group. Of the 1,120 respondents who answered this question:

- 976 respondents (87.14%) indicated they would visit with friends;
- 809 respondents (72.23%) would visit with a partner;
- 752 respondents (67.14%) would visit with family;
- 512 respondents (45.71%) would visit with their children;
- 233 respondents (20.80%) would visit with their dog(s); and
- 129 respondents (11.52%) indicated they would visit alone.

The results strongly support the Applicant's intended positioning of Froth Craft Brewery Geraldton as a social, family-friendly hospitality venue, rather than a premises principally associated with solitary or high-volume liquor consumption. The overwhelming preference to attend with friends, partners and family indicates that patrons anticipate using the Premises as a place to meet, dine, socialise and spend time with others.

Of particular relevance is the strong representation of families. More than two-thirds of respondents (67.14%) indicated that they would visit with family, while almost half (45.71%) specifically indicated that they would visit with their children. This provides direct community evidence supporting the Applicant's decision to incorporate family-oriented facilities, including a dedicated children's playground, an all-day food offering and indoor and outdoor areas capable of accommodating family groups.

These findings are consistent with the design and proposed operations of the Premises, which include an indoor dining and taproom area suitable for families, couples and groups, an outdoor beer garden, a spacious children's playground and food available throughout trading hours.

The Applicant considers the anticipated group-based and family-oriented patronage relevant to the overall risk profile and harm-minimisation strategy of the Premises. However, the Applicant does not assume that the presence of families or mature social groups removes the risks associated with the supply of liquor. The venue will continue to apply the same responsible service and patron-management standards to all guests irrespective of the composition of their group.

In particular, the Applicant has considered the potential interaction between children and the operation of licensed premises. The dedicated children's area is intended to make the venue suitable for family dining and social occasions, but will not diminish the responsibility of accompanying adults or the Applicant's obligations in relation to minors. Children will be required to be appropriately supervised by a responsible adult, staff will be trained in the management of minors on licensed premises, and the venue will maintain appropriate physical and operational controls around children's recreational areas and areas in which liquor is served. These matters are addressed further in Section 5.4 – Children and Young People.

The Applicant has also considered that accommodating different patron groups within the same Premises may create competing expectations regarding amenity. The community survey included requests for children's facilities and family-friendly spaces, while some respondents expressed a preference for areas or periods without children or dogs. This feedback demonstrates that the consultation process captured differing community views and has assisted the Applicant in considering how the Premises should be designed and managed.

These differing expectations will be taken into account through the design, layout and ongoing management of the Premises, including appropriate management and supervision of family, children's and outdoor areas. The Applicant will monitor the operation of these areas and respond appropriately should any aspect of their use adversely affect patron comfort, safety or the amenity of the Premises.

Overall, the survey results demonstrate that the Geraldton community envisages Froth Craft Brewery Geraldton primarily as a shared social and hospitality destination. The Applicant submits that this anticipated patron profile is consistent with the proposed food-focused, family-friendly and community-oriented, responsible operating model and supports the proposition that the Tavern Licence will cater to a genuine and demonstrated community demand, while being operated in a manner designed to minimise potential adverse social impacts.

5.4 Children and Young People

The Applicant recognises that children and young people comprise a significant component of the Geraldton community and require particular consideration in assessing the potential impact of the proposed Tavern Licence.

Children can also reasonably be expected to attend Froth Craft Brewery Geraldton. As described in Section 4.2, the Premises is deliberately intended to operate as a food-focused, family-friendly hospitality venue incorporating indoor and outdoor dining areas, food throughout trading hours and a dedicated children's playground.

The Applicant has therefore considered children and young people both as members of the surrounding community and as persons who may lawfully attend the Premises with a parent, guardian or other responsible adult.

The family-friendly nature of the Premises is intended to form part of a broader food, hospitality and social experience. It is not intended to create a child-focused environment in which alcohol consumption or promotion forms part of children's recreation or entertainment.

5.4.1 Community Survey Evidence

The Applicant's community consultation provides direct evidence that families expect to use the proposed Premises.

Of the 1,120 respondents who answered the question concerning who they would like to visit Froth Craft Brewery Geraldton with, 752 respondents (67.14%) selected family and 512 respondents (45.71%) specifically selected their children.

Almost half of respondents therefore expressly anticipate attending the Premises with children. The Applicant has responded to this anticipated manner of use through the proposed children's playground, substantial food offering and indoor and outdoor areas capable of accommodating family groups.

The broader community benefit associated with family patronage, including the availability of comparable family-oriented hospitality facilities within the locality, is considered further in Section 5.8.

5.4.2 Applicant's Experience Operating Family-Friendly Licensed Venues

The proposed family-friendly operating model is not new or untested for the Applicant.

Froth's existing venues in Exmouth, Bunbury and North Beach have been deliberately designed and operated to accommodate families and children within licensed hospitality environments. Beginning with the Exmouth venue in 2017, the Froth group has developed practical experience managing family dining, minors, liquor service, entertainment, busy trading periods, supervision requirements and the interaction between family-oriented and general licensed areas.

Across that operating history, the Froth group has not experienced any liquor licensing incident or infringement relating to juveniles.

The Applicant does not rely upon this history as demonstrating that no risk exists at the Geraldton Premises. Rather, it provides relevant practical evidence of the Applicant's experience in managing the responsibilities associated with children attending licensed premises.

That experience will inform the Geraldton operation together with the specific controls described below and in the Harm Minimisation Plan submitted with the Tavern Licence application.

5.4.3 Potential Risks to Children and Young People

The Applicant recognises that encouraging family attendance at licensed premises creates responsibilities that must be actively managed.

The reasonably foreseeable risks considered by the Applicant include:

- minors obtaining or consuming liquor;
- attempted secondary supply of liquor to minors;
- inadequate supervision of children by accompanying adults;
- exposure to intoxicated, disorderly or otherwise inappropriate patron behaviour;
- interaction between children using the playground and patrons consuming liquor;
- children entering the bar serverly, service areas or other areas not intended for recreational use;
- exposure to inappropriate language, behaviour or entertainment;
- inappropriate exposure to alcohol-focused advertising, promotions or other alcohol-related stimuli; and
- the possibility that family-oriented facilities could create an incorrect perception that the normal controls applying to licensed premises are relaxed.

The Applicant considers that acknowledging and actively managing these risks is an essential component of operating a genuinely family-friendly licensed venue.

5.4.4 Venue Design and Operational Controls

The Premises has been designed to accommodate families while maintaining appropriate controls associated with the operation of a Tavern Licence.

Relevant measures will include:

- a substantial food menu available throughout trading hours, including food suitable for children;
- a dedicated children's playground;
- no alcohol being permitted to be taken into or consumed within the children's playground;
- clear signage at the entrance to and within the playground stating that alcohol is not permitted in the playground area;
- active staff monitoring of the playground and enforcement of the no-alcohol requirement;
- juveniles not being permitted to order from the bar serverly;

- venue layout and furniture capable of accommodating families, prams and young children;
- appropriate separation and operational controls between the children's playground and liquor-service areas;
- active supervision of the Premises by management and staff;
- signage and staff procedures concerning the presence and supervision of minors;
- staff training concerning the management of minors on licensed premises;
- age-verification procedures to prevent the sale or supply of liquor to minors;
- free drinking water and a meaningful range of non-alcoholic beverages;
- no adult wagering facilities;
- no promotions designed to encourage rapid or excessive consumption of liquor; and
- management of entertainment and patron behaviour so that the character of the Premises remains consistent with its proposed family-friendly hospitality model.

The alcohol-free playground will therefore be clearly identifiable as a separate children's recreational area, with signage and active staff monitoring used to reinforce that liquor is not to be taken into or consumed within that area.

These controls complement the broader RSA, patron-monitoring, security and incident-management measures described throughout this Assessment and in the Harm Minimisation Plan submitted with the Tavern Licence application.

5.4.5 Supervision and Protection of Minors

The children's playground will operate as an amenity for families and not as a childcare facility. Responsibility for supervising children will remain with their accompanying responsible adult.

Venue staff will nevertheless monitor the playground and other family areas as part of their general supervision of the Premises. Where staff observe unsafe behaviour, inadequate supervision or circumstances that may compromise a child's safety or wellbeing, staff will address the matter with the accompanying responsible adult and escalate it to management where necessary.

The Applicant will comply with the requirements of the Liquor Control Act 1988 (WA) relating to juveniles and the sale, supply and consumption of liquor.¹⁸ Staff involved in liquor service will be appropriately trained and instructed in age-verification and refusal-of-service procedures.

A precautionary approach will be adopted where there is uncertainty regarding age. Staff will also be instructed to identify and respond appropriately to attempts by adults to purchase or supply liquor for consumption by minors.

The Applicant's approach is consistent with current guidance published by Racing, Gaming and Liquor concerning juveniles on licensed premises and proof of age.¹⁹

The family-friendly character of the Premises will not result in any relaxation of these controls. Staff and management will actively monitor intoxication and patron behaviour and intervene where behaviour may adversely affect children, families or other patrons. These procedures are addressed in greater operational detail in the Harm Minimisation Plan.

5.4.6 Exposure to Alcohol-Related Stimuli and Responsible Promotion

The Applicant has also considered the potential for children attending licensed premises to be exposed to alcohol advertising, imagery, consumption and other alcohol-related stimuli.

A 2024 peer-reviewed narrative review published in Drug and Alcohol Review, “The potential adverse effects of minors' exposure to alcohol-related stimuli via licenced venues: A narrative review”, considered available research concerning minors' exposure to licensed venues and alcohol-related stimuli.²⁰ The review identified evidence that exposure to alcohol advertising and observation of irresponsible alcohol consumption may contribute to the normalisation of alcohol use and positive alcohol expectations among children and young people. The review also acknowledged that research directly examining the effects of minors attending licensed venues remains limited.

The Applicant does not suggest that attendance by children at licensed premises necessarily causes future alcohol consumption or alcohol-related harm. However, the research identifies a reasonably foreseeable issue which the Applicant considers appropriate to address proactively.

The Applicant's objective is to distinguish between children observing responsible adult consumption within a broader hospitality environment and unnecessarily exposing children to alcohol-focused marketing, promotion or entertainment.

Accordingly:

- the children's playground, menus and activities will not be used as vehicles for liquor advertising;
- children's areas will not contain alcohol-branded games, amusement machines or promotional activities associating alcohol with play or reward;
- liquor promotions will not use cartoons, children's themes, games or imagery designed to appeal particularly to minors;
- tables and screens will not be routinely used for pervasive alcohol advertising;
- screens will principally display general entertainment such as sport, surfing and community content rather than repeated liquor advertising;
- the broader visual identity of the Premises will focus on food, hospitality, community, music, recreation, Geraldton's coastal environment and the Froth venue experience rather than presenting alcohol consumption as the principal source of enjoyment;
- substantial food, drinking water and non-alcoholic beverages will be readily available; and
- staff will actively manage intoxication and disorderly behaviour.

These measures are also consistent with the Director of Liquor Licensing's current guidance concerning responsible promotion and advertising of alcohol, which identifies promotions encouraging underage drinking or designed to appeal to persons under 18 as inappropriate.²¹

5.4.7 Children and Young People in the Surrounding Locality

The Applicant has also considered children and young people who may use the surrounding Geraldton CBD and foreshore precinct without entering the Premises.

The Premises is located within an established area used by families, residents and visitors for recreation, dining and tourism. Children and young people can therefore reasonably be expected to pass the Premises and use nearby public areas.

Responsible service, active patron monitoring, appropriate security arrangements and management of departing patrons will be used to minimise the potential for intoxicated, disorderly or otherwise inappropriate patron behaviour to affect surrounding public spaces. These matters are considered further in Sections 6 and 7 and in the Harm Minimisation Plan.

The family and recreational character of the surrounding foreshore also reinforces the Applicant's intention to avoid inappropriate or excessive alcohol-focused advertising or promotion visible from the surrounding public realm.

The Applicant recognises that actively encouraging family patronage and providing a dedicated children's playground creates responsibilities extending beyond simply complying with the statutory requirements relating to juveniles. The proposed operating model therefore addresses the principal foreseeable issues associated with children attending the Premises: appropriate supervision; prevention of the sale or supply of liquor to minors; interaction between children's and liquor-service areas; protection from intoxicated or disorderly behaviour; responsible promotion of liquor; and unnecessary exposure to alcohol-related stimuli.

The alcohol-free children's playground, clear signage and staff enforcement, prohibition on juveniles ordering from the bar, food-focused manner of trade, age-verification procedures, active patron monitoring and responsible promotional environment provide practical controls directed specifically to those risks.

These measures are supported by the Applicant's practical experience operating family-friendly licensed venues in Exmouth (since 2017), Bunbury (since 2022) and North Beach (since 2023) without liquor licensing incidents or infringements relating to juveniles. The Applicant nevertheless recognises that the Geraldton Premises must be managed according to its own physical layout, patron profile and operating experience.

The effectiveness of these arrangements will therefore be monitored following commencement of trade, with management responding to recurring supervision, patron-behaviour, playground or other issues where identified. This is consistent with the ongoing monitoring and adaptive-management approach described in Section 5.7.

Having regard to the demonstrated community demand for family-friendly hospitality, the Applicant's operating experience and the specific controls proposed, the Applicant considers that children and families can be appropriately accommodated within the Premises without compromising the safety and wellbeing of children and young people or the Applicant's obligations as the holder of a Tavern Licence.

5.5 Aboriginal People and Communities

The Applicant recognises that Aboriginal and Torres Strait Islander people comprise a significant component of the Geraldton and broader Mid West community and that the potential impact of a new licensed premises upon Aboriginal people and communities is an important consideration in this Public Interest Assessment.

The Applicant also recognises that alcohol-related harm can disproportionately affect some Aboriginal communities and that this issue requires careful and culturally respectful consideration. The Applicant does not seek to generalise about Aboriginal people or assume that Aboriginal identity itself represents a risk factor. Rather, the purpose of this section is to identify relevant characteristics of the locality, consider foreseeable risks associated with the sale, supply and consumption of liquor, and demonstrate the measures by which the Applicant proposes to minimise the risk of the Premises contributing to alcohol-related harm.

5.5.1 Aboriginal Population in Geraldton

According to the 2021 Census, 3,814 persons within the City of Greater Geraldton identified as Aboriginal and/or Torres Strait Islander, representing 9.7% of the population. This is substantially higher than the corresponding proportion across Western Australia of 3.3% and Australia of 3.2%²².

The Aboriginal and Torres Strait Islander population of Greater Geraldton also has a considerably younger age profile than the population generally. The 2021 Census records a median age of 24 years

for Aboriginal and Torres Strait Islander people within Greater Geraldton, compared with approximately 40 years for the Greater Geraldton population overall.

This younger population profile is relevant to the Applicant's consideration of harm minimisation because younger adults may form part of the potential patron population of licensed premises. It reinforces the importance of effective age-verification procedures, responsible promotion of liquor, active patron management and responsible service practices.

Geraldton also functions as an important regional service centre for communities throughout the Mid West and Gascoyne. Accordingly, the Applicant recognises that consideration of Aboriginal people and communities should not be confined solely to permanent residents within the immediate locality. Aboriginal residents and visitors from surrounding communities may access Geraldton for health, education, government, retail and other services.

5.5.2 Location of the Premises

The Premises is located within the Geraldton CBD and established foreshore commercial, hospitality and tourism precinct, an area identified by the City of Greater Geraldton for increased food, beverage, entertainment and tourism activity. The Applicant is not aware of any identified Aboriginal residential community or concentrated Aboriginal residential area immediately adjoining or in close proximity to the Premises. Rather, the immediate locality is predominantly characterised by commercial, hospitality, tourism, recreational and civic uses. This is considered relevant to the potential impact of the proposed licence, while recognising that Aboriginal people reside throughout Geraldton and may work in, visit or travel through the CBD. The strategic planning context of the Premises is considered in further detail in Section 6.1 of this Assessment.

5.5.3 Potential Harm Considerations

In assessing the proposed Tavern Licence, the Applicant has considered the potential ways in which the operation of licensed premises could contribute to alcohol-related harm affecting Aboriginal people and other potentially vulnerable members of the community.

These include:

- excessive or rapid consumption of liquor;
- service of liquor to intoxicated persons;
- promotions or pricing practices that encourage excessive consumption;
- the potential for intoxication to contribute to antisocial behaviour, injury or conflict;
- the potential for intoxicated patrons to adversely affect surrounding public areas;
- the risk of secondary supply of liquor to minors;
- the potential for vulnerable persons to remain on or around the Premises while intoxicated;
- the availability of safe transport and responsible management of patrons departing the Premises; and
- the need to ensure that venue policies are applied consistently, respectfully and without discrimination.

The Applicant considers that these risks should be addressed through the manner in which the Premises operates rather than through assumptions concerning particular individuals or groups.

5.5.4 Responsible Service and Harm-Minimisation Measures

The Applicant's proposed operating model incorporates a range of measures intended to minimise alcohol-related harm across the entire patron population.

These measures are particularly relevant in the context of the Aboriginal population identified above and will include:

- Food-focused operation: A substantial food menu will be available throughout trading hours, with the Premises positioned as a dining, social and hospitality venue rather than a premises principally directed toward liquor consumption.
- Responsible pricing and promotion: The Applicant does not intend to adopt a business model based upon cheap liquor, rapid-consumption promotions or other practices designed to encourage excessive consumption.
- Responsible Service of Alcohol: Staff involved in the sale and supply of liquor will hold the appropriate RSA qualifications and will be trained to identify signs of intoxication and intervene appropriately.
- Refusal of service: Liquor will not be sold or supplied to intoxicated persons, and management and staff will be supported in refusing service where required.
- Age verification: Identification procedures will be applied to reduce the risk of liquor being sold or supplied to minors.
- Food, water and alternatives to alcohol: Food will remain available throughout trading hours, free drinking water will be readily available and the beverage range will include low- and non-alcoholic alternatives.
- Patron monitoring: Staff and management will actively monitor patron behaviour and consumption rather than relying solely upon intervention after intoxication has become apparent.
- CCTV and venue supervision: CCTV and active staff supervision will assist in identifying inappropriate behaviour and managing incidents.
- Security where appropriate: Licensed security personnel will be engaged during periods where patron numbers, events or other operating circumstances warrant additional supervision.
- Incident management: Significant incidents, refusals of service and other relevant matters will be documented and reviewed so that recurring risks or patterns can be identified and operational procedures adjusted where appropriate.
- Management of departing patrons: Staff and management will take reasonable steps to manage intoxicated or disruptive persons and minimise adverse behaviour affecting the surrounding CBD and foreshore precinct.

These measures are consistent with the broader harm-minimisation strategy adopted throughout this Assessment and are intended to prevent problematic drinking behaviours from becoming established within the Premises.

5.5.5 No Targeting of Vulnerable Groups

The Applicant will not market or operate Froth Craft Brewery Geraldton in a manner specifically designed to attract persons experiencing alcohol-related vulnerability or to encourage high-volume consumption.

The proposed business model is instead based upon craft beer, food, hospitality, social interaction, family attendance and entertainment. Liquor forms an important component of the offering, but the Applicant's commercial model does not depend upon the sale of cheap liquor or encouraging patrons to consume liquor rapidly or excessively.

The Applicant has also considered the potential impact associated with the availability of packaged liquor for consumption away from licensed premises. Australian research and government policy recognise that the accessibility and density of packaged-liquor outlets can be relevant to alcohol-related harm, while evidence concerning alcohol restrictions in Aboriginal communities has identified reductions in alcohol-related harm associated with measures restricting access to particular high-strength and low-cost alcohol products.

The Applicant does not propose to operate Froth Craft Brewery Geraldton as a bottle shop or general packaged-liquor outlet. In particular, the Applicant does not propose to sell takeaway cask wine, spirits, fortified wine, mainstream packaged beer or other inexpensive or high-alcohol products manufactured by unrelated producers.

Any takeaway liquor sales are intended to be limited to products manufactured by the Applicant's associated Froth Craft Brewery entity, Froth Craft Brewery Bunbury, with takeaway craft beer expected to be sold predominantly through growler fills. The Applicant would accept an appropriate licence condition limiting takeaway sales accordingly.

This materially distinguishes the proposed operation from a conventional packaged-liquor outlet. The grant of the Tavern Licence would therefore not result in the establishment of an additional general bottle shop within the locality or create a new source of inexpensive packaged liquor for consumption away from licensed premises.

The Applicant considers this relevant to the assessment of potential alcohol-related harm, including potential impacts upon vulnerable members of the community. It does not remove the risks associated with the sale and supply of liquor generally, but it avoids introducing an additional general packaged-liquor outlet and the associated availability of low-cost takeaway alcohol into the locality.

5.5.6 Cultural Respect and Equal Treatment

The Applicant is committed to ensuring that Aboriginal patrons are treated with dignity and respect and receive the same standard of hospitality as every other patron.

Harm-minimisation measures, RSA procedures, identification requirements, refusal-of-service policies and behavioural standards will be applied on the basis of individual circumstances and observed behaviour, not a person's race or Aboriginality.

The Applicant considers this distinction important. Recognition of the potential for alcohol-related harm affecting some Aboriginal communities must not result in discriminatory treatment of Aboriginal patrons.

Staff will be expected to communicate respectfully when exercising RSA responsibilities, including when requesting identification, refusing service, managing patron behaviour or requiring a person to leave the Premises.

The Applicant will also remain receptive to engagement with appropriate local Aboriginal organisations, community representatives, WA Police, licensing authorities and other relevant bodies should concerns or opportunities for improved practices arise following commencement of operations.

5.5.7 Ongoing Monitoring and Response

The Applicant recognises that responsible venue management requires ongoing assessment rather than reliance solely upon measures established before commencement of trade.

Management will therefore monitor incidents, refusals of service, patron behaviour, complaints and other relevant feedback concerning the operation of the Premises. Where patterns or recurring issues are identified, management will consider whether additional or modified controls are appropriate.

If evidence emerges that a particular operating practice, promotion, event or trading period is contributing to an increased risk of alcohol-related harm, the Applicant will review that practice and implement reasonable additional controls where appropriate.

The Applicant will also cooperate with WA Police, licensing authorities, the City of Greater Geraldton and relevant community organisations where issues affecting community safety or wellbeing are identified.

This provides a mechanism for the Applicant's harm-minimisation strategy to respond to actual operating experience and emerging issues rather than remaining static.

5.5.8 Overall Assessment

The Applicant recognises that Aboriginal and Torres Strait Islander people comprise a significant proportion of the Greater Geraldton community and has expressly considered the potential impact of the proposed Tavern Licence upon Aboriginal people and communities.

The Applicant acknowledges that, as with any premises authorised to sell and supply liquor, the operation of the Premises carries potential alcohol-related risks which require appropriate and ongoing management. The Applicant has therefore considered both the characteristics of the locality and the manner in which the proposed Premises will operate in assessing and mitigating those risks.

The Premises is located within Geraldton's established CBD and foreshore commercial, hospitality, tourism and entertainment precinct. As far as the Applicant is aware, the Premises is not located within or immediately adjoining an identified Aboriginal residential community or concentrated Aboriginal residential area. This is considered a relevant factor in assessing potential exposure to alcohol-related harm, although the Applicant recognises that Aboriginal people reside throughout Geraldton, may work in, visit or travel through the CBD, and can reasonably be expected to form part of the Premises' patron population. The Applicant therefore does not rely upon the location of the Premises alone as a harm-minimisation measure.

Of particular relevance is the Applicant's proposed approach to takeaway liquor. The Premises is not intended to operate as a bottle shop or general packaged-liquor outlet. The Applicant does not propose to sell takeaway cask wine, spirits, fortified wine, mainstream packaged beer or other takeaway liquor manufactured by unrelated third-party producers. Takeaway liquor sales are intended to be restricted to products manufactured by the Applicant or its associated Froth Craft Brewery entity, Froth Craft Brewery Bunbury, with takeaway craft beer expected to be sold predominantly through growler fills.

This limitation is relevant to the assessment of potential harm because Australian research and government policy recognise that the availability and density of packaged-liquor outlets, and access to inexpensive and high-alcohol takeaway products, can contribute to alcohol-related harm. Evidence concerning alcohol restrictions affecting Aboriginal communities has similarly demonstrated that restrictions upon access to particular high-strength and low-cost takeaway alcohol products can form an effective component of broader harm-minimisation strategies. The proposed Tavern Licence would therefore not establish an additional general bottle shop or create a new source of inexpensive packaged liquor within the locality.

The Applicant nevertheless recognises that limiting the packaged-liquor component of the business does not remove the risks associated with the sale and consumption of liquor on the Premises. Those risks will be addressed through the Applicant's broader operating model, including a substantial food offering throughout trading hours, responsible liquor pricing and promotion, appropriately trained staff, strict RSA practices, active patron monitoring, age-verification procedures, ready availability of food, free drinking water and low- and non-alcoholic alternatives, appropriate CCTV and security measures, incident management procedures and responsible management of patrons departing the Premises.

These measures will be applied consistently to all patrons according to individual behaviour and circumstances and without discrimination. The Applicant's recognition of the potential for alcohol-related harm affecting Aboriginal people and communities will not result in different standards of service or treatment based upon a person's race or Aboriginality.

Having regard to the location and character of the Premises, the absence of a proposed general packaged-liquor or bottle-shop operation, the restricted nature of the proposed takeaway offering, and the operational and harm-minimisation measures described above, the Applicant considers that the proposed Tavern Licence can operate in a manner that is inclusive and respectful of Geraldton's Aboriginal community while appropriately identifying, monitoring and mitigating foreseeable alcohol-related harms.

5.6 Illicit Drug Abuse

The Applicant recognises that illicit drug use, possession and supply are potential risks that require consideration in the operation of licensed premises. While Froth Craft Brewery Geraldton is not intended to operate as a nightclub or late-night entertainment venue, the Applicant does not assume that its proposed style of operation eliminates the possibility of illicit drug-related activity.

The Applicant has therefore considered available evidence concerning illicit drug activity within Geraldton and regional Western Australia, together with the circumstances in which a licensed hospitality venue could potentially facilitate, encounter or be affected by such activity.

5.6.1 Geraldton and Regional Context

Illicit drug use is an existing community health and law-enforcement issue within Geraldton and the broader Mid West and is not confined to licensed premises or any particular patron group.

Published Geraldton LGA crime statistics, compiled from WA Police data, record 785 drug offences during 2024²³. The corresponding figures were 738 in 2023, 727 in 2022, 794 in 2021 and 753 in 2020. The figures demonstrate that drug offending is a recurring issue within the broader Geraldton community, although the Applicant does not suggest that these offences are associated with licensed premises or that fluctuations in recorded offences necessarily demonstrate changes in underlying drug use.

There is also clear evidence that alcohol and other drug-related harm is an established health consideration within the Mid West. WA Country Health Service operates the Midwest Community Alcohol and Drug Service, including a service based at Geraldton Health Campus. The service provides counselling, support, assessment, referral, education and other services intended to reduce alcohol and other drug-related harm.²⁵

In June 2026, the Western Australian Government advised Parliament that 6,104 alcohol and other drug treatment episodes had been opened through relevant Mid West services between 1 January 2016 and 30 December 2025. In 2025, 682 treatment episodes were recorded, comprising 633 community-treatment and 49 residential-treatment episodes. The Government notes that treatment episodes spanning more than one year can appear in multiple annual periods, meaning the individual annual figures should not simply be added together.²⁶

Broader regional evidence is also relevant. The Australian Criminal Intelligence Commission's National Wastewater Drug Monitoring Program reported that in August 2024 average methylamphetamine consumption in regional areas exceeded consumption in capital-city areas and that Western Australia recorded the highest average regional methylamphetamine consumption of the Australian jurisdictions measured.⁷⁷

The Applicant recognises that the wastewater program deliberately de-identifies individual testing locations and therefore does not rely upon this evidence as establishing a particular level of drug consumption within Geraldton itself. Rather, it provides broader context concerning illicit drug use within regional Western Australia.

The Applicant does not contend that these broader community issues are caused by, or necessarily associated with, licensed hospitality premises. Rather, the evidence demonstrates that illicit drug use is a relevant existing issue within Geraldton and regional Western Australia which should reasonably be considered when assessing the operation of a new licensed premises.

5.6.2 Potential Risks

The Applicant has considered the circumstances in which illicit drug-related activity could potentially arise in connection with the Premises.

Relevant risks include:

- possession or consumption of illicit drugs within the Premises;
- supply or attempted supply of illicit drugs between patrons;
- illicit drug activity occurring within toilets or other areas offering greater privacy;
- patrons entering or remaining within the Premises while affected by illicit drugs;
- the combined effects of illicit drugs and alcohol upon patron behaviour, judgement and wellbeing;
- drug-affected behaviour resulting in aggression, disorder, medical emergencies or risks to other patrons and staff;
- suspicious activity occurring around entrances, exits or immediately surrounding areas associated with the Premises; and
- drug-related behaviour adversely affecting the amenity or good order of the surrounding CBD and foreshore precinct.

The Applicant considers it preferable to identify these possibilities expressly rather than assume that they will not arise because of the intended character of the venue.

5.6.3 Character and Operating Model of the Premises

The proposed character of Froth Craft Brewery Geraldton is relevant when considering the likelihood and management of illicit drug-related activity.

The Premises is intended to operate as a food-focused, family-friendly craft brewery and hospitality venue incorporating substantial food service, indoor dining, an outdoor beer garden and a dedicated children's playground. The Applicant's community survey provides direct evidence that prospective patrons anticipate using the venue predominantly with friends, partners and family, including significant anticipated attendance with children.

The Premises is not proposed as a nightclub or venue principally dependent upon late-night entertainment, high-volume liquor consumption or a predominantly young late-night patron demographic. Liquor promotions will not be designed to encourage rapid or excessive consumption.

These characteristics are considered relevant to the overall risk profile of the Premises. However, the Applicant does not rely upon the character of the venue as a substitute for appropriate preventative and management measures.

5.6.4 Prevention, Detection and Staff Response

The Applicant will maintain a clear policy that illicit drug use, possession or supply is not acceptable within the Premises.

Management and staff will be instructed to remain alert to behaviour or circumstances that may reasonably indicate illicit drug use or supply. Relevant staff training and operational procedures will address the appropriate escalation and response where suspicious behaviour is observed.

Depending upon the circumstances, the response may include intervention by management, refusal of further liquor service, requiring a patron to leave where lawful and appropriate, involvement of security personnel, arranging medical assistance where a person's health or safety may be at risk, and contacting WA Police where circumstances warrant.

Staff will not be expected to place themselves at unnecessary risk or attempt to perform the role of police. Responses will be proportionate to the circumstances observed and the safety of patrons and staff will remain an important consideration.

Where an incident is sufficiently serious or relevant to the ongoing management of the Premises, appropriate details will be recorded in the venue's incident register and reviewed by management.

5.6.5 CCTV, Toilets and Venue Supervision

The design and supervision of the Premises will assist management in discouraging and identifying inappropriate behaviour.

CCTV will be utilised in appropriate areas of the Premises in accordance with the final approved venue and security arrangements. CCTV coverage may include entrances and exits, principal patron areas and relevant external areas under the Applicant's control.

CCTV will not be installed within toilet cubicles or other areas where patrons have a reasonable expectation of privacy. Toilet access areas may, however, be monitored where lawful and appropriate.

Toilet facilities and other areas offering greater privacy will be checked periodically as part of normal venue supervision and housekeeping. Staff will be instructed to remain alert to unusual behaviour or patterns of activity that may reasonably indicate illicit drug use or supply.

Where evidence of suspected illicit drug activity is identified, management will respond in accordance with venue procedures and determine whether further action, including contact with WA Police, is appropriate.

The outdoor beer garden, entrances, exits and other patron areas will similarly form part of normal staff and management supervision.

5.6.6 Patron Welfare and Medical Emergencies

The Applicant recognises that a suspected drug-related incident may involve a patron welfare issue as well as a behavioural or security issue.

Where a person appears seriously unwell, unconscious, significantly impaired or otherwise in need of medical assistance, the immediate priority will be the person's safety. Staff and management will obtain appropriate assistance, including contacting emergency services where circumstances warrant.

A person suspected of being affected by illicit drugs will not be supplied further liquor where their condition or behaviour makes continued service inappropriate or unlawful.

The Applicant considers this distinction important. A prohibition upon illicit drug activity should not prevent staff from responding appropriately and promptly where a genuine medical emergency or risk to a person's welfare arises.

5.6.7 Security and Management of the Surrounding Area

The Applicant recognises that responsible management of the Premises includes taking reasonable steps to prevent patron behaviour associated with the venue from adversely affecting the immediate locality.

Security arrangements will be proportionate to patron numbers, trading periods, entertainment, particular events and other relevant operating circumstances. Licensed crowd controllers or RSA marshals will be engaged whenever it is deemed to be appropriate, in accordance with an approved management plan or circumstances associated with the operation of the Premises.

Staff, management and security personnel will monitor entrances, exits and relevant external areas associated with the Premises as part of normal patron management. Where suspected drug supply, serious disorder or other potentially criminal activity is identified, the Applicant will cooperate with WA Police and other relevant authorities.

The Applicant does not suggest that it can control illicit drug activity occurring generally throughout the Geraldton CBD or public foreshore. Its responsibility is to appropriately manage conduct occurring within the Premises and take reasonable steps in relation to patron behaviour associated with the operation of the venue.

5.6.8 Experience of the Applicant

The Applicant's proposed controls are supported by substantial practical experience in the operation of licensed hospitality premises.

Four of the directors of Froth Craft Brewery Geraldton are also directors of Froth Craft Brewery Exmouth, Froth Craft Brewery Bunbury and Froth Craft Brewery North Beach. Those venues provide the Applicant's directors with substantial practical experience in RSA, patron supervision, incident management, security considerations and the management of family-friendly licensed environments.

The Froth Craft Brewery group has a demonstrated history of operating its existing venues within the terms of their respective liquor licences without adverse licensing incident.

Accordingly, the proposed Geraldton management framework is not based solely upon policies developed for the purpose of this application. It draws upon operational practices and experience developed through the group's existing licensed venues.

Experience gained at Exmouth, Bunbury and North Beach will inform staff training, management procedures, security arrangements and the Applicant's response to any illicit drug-related behaviour that may arise at Geraldton.

5.6.9 Ongoing Monitoring and Cooperation with Authorities

The Applicant recognises that responsible venue management requires ongoing assessment and that the appropriate response to illicit drug-related risk may evolve following commencement of trade.

Management will monitor relevant incidents, observations by staff and security personnel, patron behaviour and any complaints or information received concerning suspected illicit drug activity associated with the Premises.

Where recurring patterns or particular areas of concern are identified, the Applicant will review its procedures and consider whether additional measures are reasonably required. These may include

changes to staff supervision, security deployment, CCTV arrangements, management of particular areas or other appropriate operational controls.

The Applicant will cooperate with WA Police, the licensing authority, health services and other relevant agencies where concerns relating to illicit drug activity arise.

This approach allows the Applicant's controls to respond to actual operating experience rather than assuming at the application stage that every potential scenario can be predicted.

The available evidence demonstrates that illicit drug use and associated harm are existing issues within Geraldton and the broader Mid West and regional Western Australian community. The Applicant does not suggest that these issues arise because of licensed hospitality premises, nor does it contend that the proposed Premises is incapable of encountering illicit drug-related behaviour.

Rather, the Applicant considers that the appropriate response is to recognise the existing risk, identify the ways in which it could potentially interact with the operation of the Premises, and implement reasonable measures intended to prevent the Premises from facilitating or contributing to illicit drug-related harm.

The proposed character of Froth Craft Brewery Geraldton is relevant to that assessment. The Premises will operate principally as a food-focused, family-friendly craft brewery and hospitality venue rather than a nightclub or late-night, high-volume drinking venue. This operating model does not eliminate the possibility of illicit drug-related activity, but it provides a controlled hospitality environment in which management and staff can actively supervise patron behaviour.

The Applicant proposes a combination of staff awareness and training, active venue supervision, appropriate CCTV, responsible service practices, incident management, patron welfare procedures, proportionate security arrangements and cooperation with WA Police and other relevant authorities.

Importantly, these measures are supported by the practical experience of the Applicant's directors in successfully operating Froth Craft Brewery venues in Exmouth, Bunbury and North Beach. The group's existing operating history provides practical experience in responsible venue management upon which the proposed Geraldton procedures can be based.

Accordingly, the Applicant considers that the potential for illicit drug-related activity has been appropriately identified and that the proposed preventative, monitoring and response measures are proportionate to the nature and risk profile of the Premises. Should actual operating experience identify additional or emerging risks, the Applicant will review and adapt those measures accordingly.

5.7 Social Health Indicators

The Applicant recognises that the assessment of a new Tavern Licence requires consideration not only of community demand for the proposed facilities, but also of the existing social and health characteristics of the locality and the potential for the proposed licence to contribute to alcohol-related harm.

The Applicant has therefore considered available information concerning alcohol and other drug-related harm, community safety, antisocial behaviour, mental health and associated social-health considerations within Geraldton and the broader Mid West region.

The Applicant does not contend that the existence of alcohol-related or other social-health issues within a community is irrelevant to the present application. Nor does it contend that a licensed premises is incapable of contributing to those issues. Rather, the Applicant considers that the appropriate approach is to identify the existing risks, consider how the proposed Tavern Licence could potentially interact with

those risks, and demonstrate the measures by which the Premises will be operated so as to minimise the potential for alcohol-related harm.

This approach is consistent with the current Public Interest Assessment requirements of the Director of Liquor Licensing. The current Form 2A requires an applicant to provide sufficient information and supporting evidence to demonstrate why the proposed licence is in the public interest, including consideration of harm that might arise from alcohol use, impacts upon amenity, quiet and good order, effects upon persons living or working nearby, and broader tourism, cultural and community impacts.²⁴

5.7.1 Geraldton and Mid West Social-Health Context

Geraldton is the principal population, commercial, health and service centre for the Mid West region. Its social-health profile therefore reflects not only the permanent Geraldton population but also the broader regional population for which Geraldton provides health, welfare, employment, recreational and other services.

Alcohol and other drug-related harm is an identifiable health consideration within the Mid West.

WA Country Health Service operates the Midwest Community Alcohol and Drug Service, with clinics in Geraldton, Carnarvon and Meekatharra. The service provides free and confidential counselling and support and states that its purpose is to reduce alcohol and other drug-related harm through coordinated professional services. The Geraldton service is located at Geraldton Health Campus.²⁵

The existence of a dedicated regional service does not establish that Geraldton experiences a particular rate of alcohol-related harm, nor does it establish any connection between such harm and licensed hospitality premises. It does, however, demonstrate that alcohol and other drug-related harm is an existing health issue for which dedicated services are required and provided within the region.

Further evidence is provided by information supplied by the Western Australian Government to Parliament in June 2026. The Government reported 6,104 alcohol and other drug treatment episodes opened through the relevant Mid West services over the period from 1 January 2016 to 30 December 2025.²⁶

For 2025, 682 treatment episodes were recorded, comprising 633 community-treatment episodes and 49 residential-treatment episodes.

The Applicant acknowledges the limitations of those figures. They relate to treatment episodes rather than necessarily representing separate individual persons, and the Government advises that episodes spanning more than one annual period can be counted in multiple years. They should therefore not be interpreted as a Geraldton-specific prevalence rate or simply aggregated across individual years.

Nevertheless, the figures provide contemporary evidence that alcohol and other drug-related harm is an established health consideration within the broader Mid West region.

5.7.2 Local Health and Support Infrastructure

The Applicant has also considered the health and support infrastructure available within Geraldton.

Geraldton Health Campus provides a range of regional health services, including a 24-hour emergency department, mental-health services, community alcohol and drug services, intensive and high-dependency care and other hospital and community-health services.²⁷

The Applicant does not rely upon the existence of health, mental-health or alcohol and drug treatment services as a substitute for responsible venue operation.

As a responsible licensee the Applicant will seek to prevent or minimise alcohol-related harm rather than assume that emergency, health or community services will manage the consequences of inappropriate service or patron behaviour.

Rather, the availability and continuing development of these services provides relevant context concerning the social-health needs of the Geraldton and Mid West community and reinforces the importance of responsible alcohol-service practices.

5.7.3 Broader Alcohol and Other Drug-Related Health Context

At a broader Western Australian level, alcohol and other drug-related harm continues to impose a measurable burden upon the health system.

The Western Australian Mental Health Commission's Annual Report 2024–25 records an age-standardised rate of hospitalisations attributable to alcohol and other drug use of 848.1 per 100,000 population for the 2024 calendar year.²⁸

The Commission reported that this was 3.4% lower than the 2023 result, while also noting that there had been an upward trend in alcohol and other drug-related harm following the lifting of COVID-related restrictions.

The Applicant does not apply this statewide rate directly to Geraldton. It is included as broader context demonstrating why alcohol-related harm remains an appropriate consideration in assessing the responsible operation of licensed premises in Western Australia.

The Applicant recognises that excessive liquor consumption can contribute to a range of adverse social and health outcomes, including intoxication, injury, accidents, aggression and violence, family conflict, chronic health effects, mental-health impacts and antisocial behaviour.

Accordingly, the relevant issue for this application is not whether alcohol-related harm exists, but the proposed manner of trade adequately identifying foreseeable risks and incorporating reasonable measures intended to prevent or minimise the Premises contributing to those risks.

5.7.4 Community Safety and Antisocial Behaviour

Community safety is also an identified priority within Greater Geraldton.

The City of Greater Geraldton has adopted a Community Safety and Crime Prevention Plan 2024–2029. The Plan was developed following consultation with residents and stakeholders concerning perceptions of crime prevention and community safety and informs the City's approach to community safety and crime prevention.²⁹

The Applicant considers this particularly relevant because the proposed Premises occupies a prominent position at the intersection of Cathedral Avenue and Foreshore Drive within Geraldton's CBD and public foreshore environment.

The surrounding locality is used by residents, visitors, families, pedestrians and neighbouring businesses. The Applicant has therefore considered not only behaviour occurring within the licensed Premises, but also the potential for intoxicated, disorderly or otherwise inappropriate patron behaviour to adversely affect the surrounding public realm.

The Applicant recognises that the grant of a licence creates responsibility to manage these potential impacts rather than assuming that conduct ceases to be relevant once patrons leave the internal licensed areas.

5.7.5 Potential Interaction Between the Proposed Licence and Existing Social-Health Risks

In developing the proposed operating model, the Applicant has considered the ways in which the proposed Tavern Licence could potentially interact with existing social-health and community-safety risks.

These include:

- excessive or rapid consumption of liquor resulting in intoxication;
- service of liquor to persons who are already intoxicated;
- aggression, conflict, disorder or other antisocial behaviour associated with intoxication;
- interaction between alcohol consumption and illicit drug use;
- alcohol-related accidents or medical emergencies;
- inappropriate behaviour affecting children, families or other patrons;
- minors obtaining or consuming liquor;
- secondary supply of liquor to minors;
- irresponsible pricing or promotional practices encouraging vulnerable persons or other patrons to consume excessively;
- intoxicated or disruptive patrons leaving the Premises and affecting surrounding public areas;
- noise, disorder or inappropriate behaviour affecting neighbouring businesses, residents, pedestrians and users of the foreshore; and
- takeaway liquor being consumed away from the supervised environment of the Premises.

The Applicant considers that expressly acknowledging these potential pathways to harm provides a more appropriate basis for the assessment than simply describing the Premises as inherently "low risk".

The proposed character of Froth Craft Brewery Geraldton is relevant to the probability and manner in which these risks may arise, but the Applicant does not rely upon venue character alone as a harm-minimisation measure.

5.7.6 Community Survey Evidence

The Applicant's community survey provides additional local evidence concerning the manner in which prospective patrons expect to use Froth Craft Brewery Geraldton.

The Applicant does not rely upon the survey as evidence that alcohol-related harm cannot occur at the Premises. Rather, the results assist in identifying the anticipated patron profile, anticipated use of the venue and preferred trading periods. These matters provide useful context for assessing the manner of trade and the environment within which the Applicant's harm-minimisation measures will operate.

Of the 1,120 respondents who answered the question concerning who they would like to visit Froth Craft Brewery Geraldton with:

- 976 respondents (87.14%) indicated that they would visit with friends;
- 809 respondents (72.23%) indicated that they would visit with a partner;
- 752 respondents (67.14%) indicated that they would visit with family;
- 512 respondents (45.71%) indicated that they would visit with their children;
- 233 respondents (20.80%) indicated that they would visit with their dog or dogs; and
- 129 respondents (11.52%) indicated that they would visit alone.

Respondents were able to select more than one option and percentages therefore do not total 100%.

The results indicate that prospective patrons principally envisage the Premises as a shared social, dining and family destination. In particular, the strong intention to attend with friends, partners, family and children is consistent with the Applicant's proposed positioning of the Premises as a broader hospitality and social venue rather than one principally directed toward liquor consumption.

The survey also indicates anticipated attendance across daytime, afternoon and evening periods.

Of the 1,125 respondents to the preferred-time question:

- 556 respondents (49.42%) selected 11am–2pm;
- 786 respondents (69.87%) selected 2pm–6pm; and
- 683 respondents (60.71%) selected after 6pm.

Respondents were permitted to select more than one trading period.

A. What time would you usually prefer to visit Froth Craft Brewery Geraldton?

Number of responses: 1125

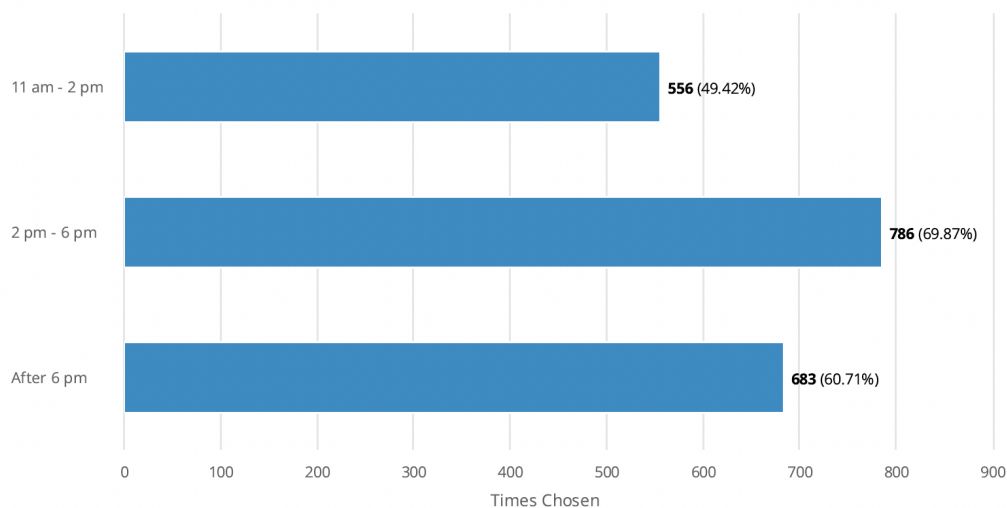


Chart 3. "What time would you usually prefer to visit Froth Craft Brewery Geraldton?" question and answers in the Applicant's survey

The highest level of stated preference was therefore for the 2pm–6pm period, while approximately half of respondents indicated an intention to attend during the lunchtime period and a substantial proportion also indicated an intention to attend after 6pm.

The Applicant considers this relevant because the survey indicates anticipated patronage distributed across a broad range of trading periods rather than community demand being concentrated solely in late-evening trading.

B. What days would you usually prefer to visit Froth Craft Brewery Geraldton?

Number of responses: 1124

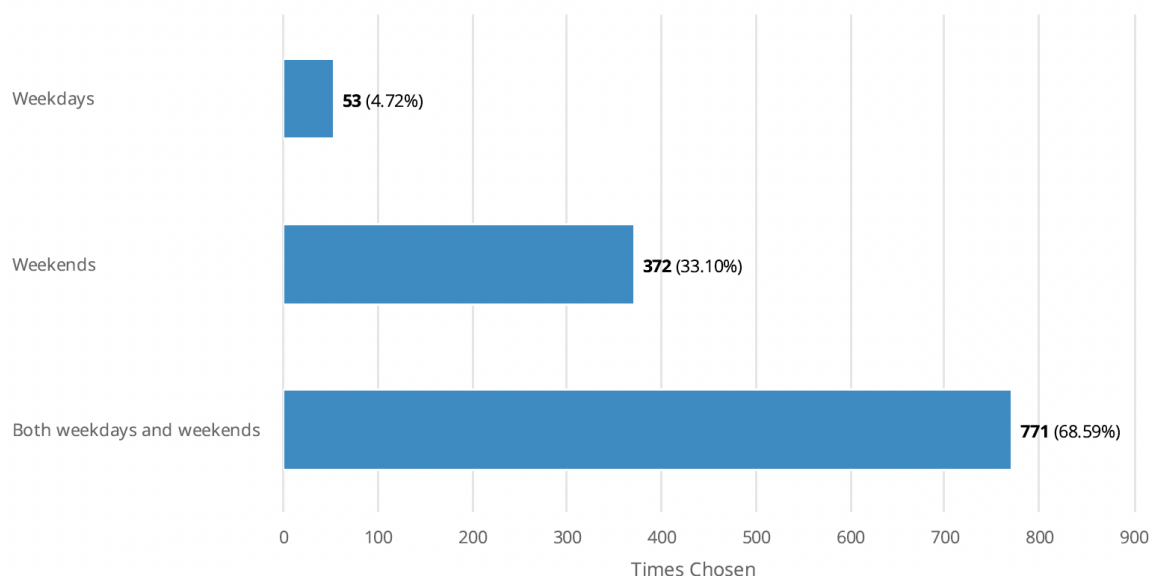


Chart 4. "What days would you usually prefer to visit Froth Craft Brewery Geraldton?" question and answers in the Applicant's survey

Similarly, of the 1,124 respondents answering the preferred-days question (see above), 771 respondents (68.59%) indicated that they would usually visit across both weekdays and weekends. A further 372 respondents (33.10%) selected weekends and 53 respondents (4.72%) selected weekdays. Respondents were again able to select more than one option.

The qualitative survey responses provide further context concerning community expectations.

Some respondents expressly described the type of environment they wished the venue to provide. Comments included a desire for a safe family environment, a safe social venue for younger adults, and a relaxed atmosphere based around spending time with friends and family and enjoying live music. Other respondents referred positively to their experience attending Froth's existing Exmouth venue with children and expressed a desire for a similar family-oriented offering in Geraldton.

The Applicant considers these responses relevant because they demonstrate that community expectations broadly align with the proposed manner of trade: a food-focused, family-friendly and socially oriented hospitality venue rather than a premises principally directed toward rapid, excessive or late-night liquor consumption.

However, the Applicant does not suggest that group attendance, family visitation or daytime patronage eliminates the risks associated with the sale and supply of liquor.

Instead, the survey provides direct local evidence supporting the intended character and anticipated pattern of use of the Premises while reinforcing the importance of implementing appropriate RSA, patron monitoring, food service, security and other harm-minimisation measures throughout all trading periods.

5.7.7 Proposed Operating Model and Harm Minimisation

The Applicant has designed the proposed manner of trade to reduce the likelihood of the Premises contributing to the social-health risks identified above.

The principal features and controls include:

- a food-focused hospitality model, with a substantial food menu available throughout trading hours;
- a family-friendly environment incorporating indoor dining, an outdoor beer garden and dedicated children's facilities;
- an emphasis upon craft beer, dining, hospitality, social interaction and entertainment rather than high-volume liquor consumption;
- liquor pricing and promotional practices that are not designed to encourage rapid or excessive consumption;
- appropriately trained staff and management;
- strict Responsible Service of Alcohol practices;
- refusal of service to intoxicated persons where required;
- active monitoring of patron consumption, intoxication and behaviour;
- appropriate age-verification procedures and controls concerning minors;
- ready availability of free drinking water;
- a range of low- and non-alcoholic beverage alternatives;
- CCTV and active supervision in appropriate areas of the Premises;
- licensed security personnel where patron numbers, entertainment, particular events or other operating circumstances warrant additional supervision;
- appropriate incident-management and recording procedures;
- management review of significant incidents and recurring risk patterns;
- reasonable management of intoxicated, disruptive or vulnerable departing patrons; and
- ongoing review and adaptation of operating procedures where experience indicates that additional controls are reasonably required;
- ongoing membership and engagement with Australian Hotel Association to help ensure continuous compliance through training regulatory updates and specific advice

These measures are consistent with the broader harm-minimisation framework already adopted throughout this Assessment.

The Applicant considers that harm minimisation is most effective when it is embedded throughout the manner of trade rather than being treated solely as an intervention once a patron has already become intoxicated.

Accordingly, food availability, patron observation, responsible promotion, appropriate venue design and staff supervision are intended to reduce risk before an incident arises, while RSA, refusal of service, incident management, security and patron-welfare procedures provide additional controls where circumstances require intervention.

5.7.8 Takeaway Liquor and Off-Premises Harm

The Applicant has also considered the potential social-health implications associated with takeaway liquor.

This is relevant because liquor purchased for takeaway may be consumed away from the licensed Premises and therefore outside the direct supervision of the licensee. The Applicant has accordingly considered both the nature of the proposed takeaway offering and the measures required to reduce the risk of takeaway liquor being consumed inappropriately in the immediate vicinity of the Premises.

The Applicant does not propose to operate Froth Craft Brewery Geraldton as a bottle shop or general packaged-liquor outlet. The Applicant does not propose to sell takeaway cask wine, spirits, fortified

wine, mainstream packaged beer or a broad range of packaged liquor manufactured by unrelated third-party producers.

Any takeaway liquor sales are intended to be restricted to products manufactured by the Applicant or its associated Froth Craft Brewery entity, Froth Craft Brewery Bunbury, with takeaway craft beer expected to be sold predominantly through sealed growler fills.

The Applicant would accept an appropriate condition upon the licence restricting takeaway liquor sales accordingly.

This approach is consistent with the manner in which takeaway liquor has previously been addressed in Froth's other Tavern Licence applications. In the North Beach application, the proposed packaged-liquor offering was expressly described as limited craft beer for takeaway consumption "at home", including growlers produced by the associated Froth brewery.

Importantly, the Applicant also proposes operational controls concerning the point of sale and the movement of takeaway liquor from the Premises.

Staff involved in the sale or supply of takeaway liquor will be trained in the Responsible Service of Alcohol as it applies to packaged liquor. Purchasers will be informed that the liquor is being supplied for takeaway consumption and is not to be opened or consumed within the immediate vicinity of the Premises.

Staff and management will remain alert to the conduct of patrons who purchase takeaway liquor as they leave the Premises. Where staff can reasonably observe a purchaser opening or consuming takeaway liquor in the immediate vicinity, or attempting to supply it to a minor, management will intervene where appropriate and take such further action as the circumstances require.

This is consistent with the existing operations at Froth Craft Brewery Exmouth, Froth Craft Brewery Bunbury and Froth Craft Brewery North Beach. Likewise, the Applicant adheres to the statutory requirement that packaged liquor not be consumed in the immediate proximity of the licensed premises and proposed staff supervision of departing purchasers for that purpose.

The Applicant's management framework for Geraldton already includes a commitment to ensuring measures are in place to control the conveyance of liquor both into and out of the Premises.

The Applicant proposes to apply that principle specifically to takeaway liquor at Geraldton through staff training, clear instructions to purchasers and active observation of the areas immediately adjoining the Premises where reasonably practicable.

The Applicant recognises that staff cannot control the lawful actions of purchasers once they have left the immediate vicinity of the Premises. The purpose of these measures is therefore not to suggest ongoing supervision of a purchaser after departure, but to take reasonable steps to ensure that takeaway liquor is genuinely taken away from the Premises for later consumption rather than being opened or consumed immediately outside the venue or within surrounding public areas visible to staff.

The Applicant does not contend that the restricted takeaway model or these operational measures eliminate the possibility of alcohol-related harm occurring away from the Premises.

However, the proposed model materially distinguishes Froth Craft Brewery Geraldton from a conventional bottle shop or general packaged-liquor retailer. The licence would not create an additional general source of low-cost, high-volume packaged liquor within the locality, and the limited takeaway offering would be supported by active controls intended to ensure that it operates as a genuine ancillary takeaway service rather than an extension of on-premises drinking into the surrounding foreshore or CBD.

The Applicant considers that the combination of a restricted product range, sealed takeaway containers, RSA-trained staff, clear communication with purchasers, active supervision of departing patrons where reasonably practicable, and the Applicant's willingness to accept an appropriate licence condition provides a proportionate response to the potential off-premises risks associated with takeaway liquor.

5.7.9 Venue Location, Surveillance and the Public Realm

The Premises occupies a highly visible location, on a busy corner, within Geraldton's CBD and foreshore precinct. The Applicant recognises that this location creates both opportunities and responsibilities.

It places the venue within an existing commercial, hospitality, tourism and recreational environment, but also means that patrons of the Premises will interact with pedestrians, families, visitors, neighbouring businesses and users of surrounding public spaces.

The Applicant considers that appropriate venue design, lighting, staff presence, signage, CCTV and passive surveillance can contribute to responsible management of the Premises and its immediate interface with the public realm.

CCTV will be utilised in appropriate areas in accordance with the final approved venue and security arrangements. Staff and management will actively supervise patron areas, entrances and exits and relevant external areas associated with the operation of the Premises.

The Applicant will take reasonable steps to prevent intoxicated or disruptive patrons from adversely affecting the surrounding locality and will involve security personnel, emergency services or WA Police where circumstances warrant.

The Applicant recognises the limits of its responsibility. It cannot control conduct occurring generally throughout the Geraldton CBD or public foreshore.

Its responsibility is to appropriately manage conduct occurring within the licensed Premises and take reasonable steps in relation to patron behaviour arising from or associated with the operation of the venue.

This approach is consistent with the City of Greater Geraldton's broader emphasis upon community safety and crime prevention within the locality.³⁰

5.7.10 Cooperation with WA Police and Local Community-Safety Initiatives

The Applicant recognises that responsible liquor management within Geraldton is supported by cooperation between licensees, WA Police, the City of Greater Geraldton and other relevant agencies.

The City of Greater Geraldton supports the Geraldton Liquor Accord as part of its broader community-safety and partnership framework. Available local-government material identifies the Accord as contributing to the management of alcohol-related issues and antisocial behaviour within the community.³¹

The Applicant intends to participate constructively in the Geraldton Liquor Accord, subject to the applicable membership and participation arrangements following commencement of trade.

Through participation in the Accord, the Applicant will seek to maintain appropriate communication with WA Police, the City of Greater Geraldton, other licensees and relevant community stakeholders concerning matters including responsible service of alcohol, patron behaviour, community safety, antisocial behaviour and emerging issues affecting licensed premises within the locality.

The Applicant considers participation particularly appropriate given the prominent CBD and foreshore location of the proposed Premises. Information sharing and cooperation between licensees and relevant authorities can assist in identifying recurring issues, coordinating appropriate responses and ensuring that individual licensed premises contribute positively to broader community-safety objectives.

The Applicant's participation would also be consistent with its broader commitment to ongoing monitoring and adaptive management. Where the Geraldton Liquor Accord, WA Police or the City identifies an emerging issue relevant to the operation of the Premises, the Applicant will consider whether its procedures, staffing, security arrangements or other operational controls should be adjusted in response.

5.7.11 Experience and Track Record of the Applicant

An important consideration in assessing the proposed controls is the Applicant's practical ability to implement them.

The Geraldton venue will form part of an established Froth Craft Brewery hospitality group. Four directors of Froth Craft Brewery Geraldton are also directors of the existing Froth Craft Brewery venues in Exmouth, Bunbury and North Beach. The Applicant's existing venues provide substantial practical experience in the operation and management of licensed hospitality premises.

The existing Froth business model is characterised by family-friendly venue design, responsible service of alcohol, substantial food availability, community engagement and a demonstrated history of operating within the terms of the relevant liquor licences without adverse licensing incident.

That experience is directly relevant to the proposed Geraldton operation.

Through its existing venues, the Applicant's directors have practical experience in RSA implementation, staff training, patron supervision, identification and management of intoxication, refusal of service, management of family-friendly licensed environments, provision of food alongside liquor service, entertainment management, incident response, patron welfare, venue security and management of departing patrons. Through the Froth Craft Brewery Bunbury venue (which opened on 8 July 2022), the Applicant has practical experience from its active involvement in the Bunbury Liquor Accord.

Accordingly, the harm-minimisation measures proposed for Geraldton are not merely theoretical controls developed for the purposes of the present application. They draw upon management procedures, practical experience and an operating model developed through the successful operation of three existing licensed Froth Craft Brewery venues. The Applicant considers this established operational history relevant to the Director's assessment of whether the proposed Geraldton controls can reasonably be expected to be implemented effectively in practice.

5.7.12 Ongoing Monitoring and Adaptive Management

The Applicant recognises that responsible harm minimisation does not end upon the grant of the licence. Following commencement of trade, management will monitor relevant incidents, refusals of service, patron behaviour, complaints, security issues, observations by staff and other information capable of identifying emerging or recurring risks associated with the operation of the Premises. Where recurring patterns or particular areas of concern are identified, management will consider whether additional or modified controls are reasonably required.

Depending upon the circumstances, this may include changes to staffing levels, security deployment, staff training, CCTV or supervision arrangements, management of particular areas, entertainment practices, service procedures, management of departing patrons or other operational measures.

The Applicant will also remain receptive to relevant information or concerns raised by WA Police, the City of Greater Geraldton, the licensing authority, neighbouring businesses, health or community organisations and members of the community.

The Applicant considers this ongoing review important because actual operating experience may identify circumstances or patterns that cannot reasonably be predicted in full at the application stage.

The Applicant's approach is therefore intended to be preventative but also adaptive: foreseeable risks are addressed before commencement of trade, while actual operating experience will inform whether further measures are required.

The Applicant's research demonstrates that alcohol and other drug-related harm, mental-health needs, antisocial behaviour and community safety are genuine social-health considerations within Geraldton and the broader Mid West. The Applicant does not seek to minimise those issues or contend that a new licensed premises is incapable of contributing to them. Instead, the existing social-health characteristics of the locality have informed the Applicant's consideration of the proposed manner of trade and its harm-minimisation strategy.

The relevant issue is therefore not simply whether alcohol-related harm already occurs within Geraldton, but whether the grant and operation of this particular Tavern Licence, having regard to its proposed manner of trade, is likely to materially contribute to those harms and whether reasonable measures are proposed to minimise that possibility.

The Applicant considers that the nature of the proposed operation is relevant to that assessment.

Froth Craft Brewery Geraldton will operate as a food-focused, family-friendly craft brewery and hospitality venue rather than as a nightclub or premises principally directed toward late-night or high-volume liquor consumption. The community survey provides direct evidence from Geraldton respondents that the proposed venue is expected to be used predominantly as a social, dining and family destination, consistent with the Applicant's intended manner of trade. Respondents in the survey overwhelmingly envisage attending with friends, partners and families, almost half indicated that they would attend with children, and anticipated attendance is distributed across lunchtime, afternoon and evening periods rather than being confined to late-evening trading.

The Applicant does not rely upon those characteristics as evidence that harm cannot occur.

Instead, they provide the context within which an extensive range of active controls will operate, including food availability throughout trading, responsible liquor pricing and promotion, trained staff and management, strict RSA, active patron monitoring, age verification, free drinking water, low- and non-alcoholic alternatives, CCTV, security where appropriate, incident management and responsible management of departing patrons.

The proposed takeaway component is also deliberately restricted. The proposed licence will not establish another conventional bottle shop or general packaged-liquor outlet, and the Applicant is prepared to accept an appropriate condition restricting takeaway liquor to Froth-produced products.

Importantly, the Applicant's ability to implement the proposed measures is supported by the practical experience of its directors in successfully operating the existing Froth Craft Brewery venues in Exmouth, Bunbury and North Beach under the same broader philosophy of food-focused, family-friendly and responsible licensed hospitality.

The Applicant recognises that these factors do not eliminate the possibility of alcohol-related harm.

Rather, they provide a practical framework by which foreseeable risks can be prevented where reasonably possible, identified at an early stage, appropriately managed where they arise, and reviewed where operating experience indicates that further measures are necessary.

Having regard to the social-health characteristics of Geraldton and the Mid West, the direct evidence obtained through community consultation, the nature and proposed manner of trade of the Premises, the restricted takeaway-liquor model, the harm-minimisation measures proposed, the Applicant's established operating experience and its commitment to ongoing monitoring and cooperation with relevant authorities, the Applicant considers that the proposed Tavern Licence can be operated in a manner that appropriately minimises the potential for the Premises to contribute to existing social-health problems within the locality and is consistent with the harm-minimisation and public-interest objectives of the Liquor Control Act 1988 (WA).

5.8 Families

Families comprise a substantial component of the Geraldton community and direct community consultation demonstrates that families are expected to form an important part of the patron base of Froth Craft Brewery Geraldton.

The relevance of families to the present application extends beyond the presence of children at licensed premises, which is considered separately and in detail in Section 5.4 – Children and Young People. This section considers the broader public-interest implications of the proposed Premises for Geraldton families, including the demographic significance of families within the community, demonstrated demand for family-oriented hospitality, the existing availability of comparable facilities within the locality, the proposed family-oriented manner of trade, differing patron expectations and the Applicant's capacity to operate such an environment responsibly.

The Applicant considers that Froth Craft Brewery Geraldton can provide an additional dining, social and recreational hospitality option for Geraldton families while maintaining appropriate controls over the sale and consumption of liquor.

5.8.1 Family Profile of Geraldton

Table 2: Family Composition – City of Greater Geraldton, 2021 Census

<i>Family composition</i>	<i>Number</i>	<i>% of families</i>
<i>Couple family without children</i>	<i>4,238</i>	<i>41.8%</i>
<i>Couple family with children</i>	<i>3,905</i>	<i>38.5%</i>
<i>One-parent family</i>	<i>1,851</i>	<i>18.2%</i>
<i>Other family</i>	<i>159</i>	<i>1.6%</i>

Families comprise a substantial component of the Greater Geraldton community. The 2021 Census recorded 10,147 families within the City of Greater Geraldton.³² Of these, 3,905 (38.5%) were couple families with children, 1,851 (18.2%) were one-parent families, 4,238 (41.8%) were couple families without children and 159 (1.6%) were classified as other families. For families with children, the average number of children was 1.9.

The Census therefore demonstrates that households and families with children form a significant component of the Geraldton community. This is also reflected in the age profile of the population and, importantly for the present application, in the Applicant's own community survey concerning anticipated use of the proposed Premises.

The Applicant considers this demographic context relevant both to the potential community benefit associated with providing family-oriented hospitality facilities and to the responsibilities arising from accommodating children and families within licensed premises.

5.8.2 Direct Evidence of Family Demand

The Applicant's community survey provides particularly relevant evidence concerning the anticipated use of the proposed Premises by families.

Would you like to visit Froth Craft Brewery Geraldton:

Number of responses: 1120

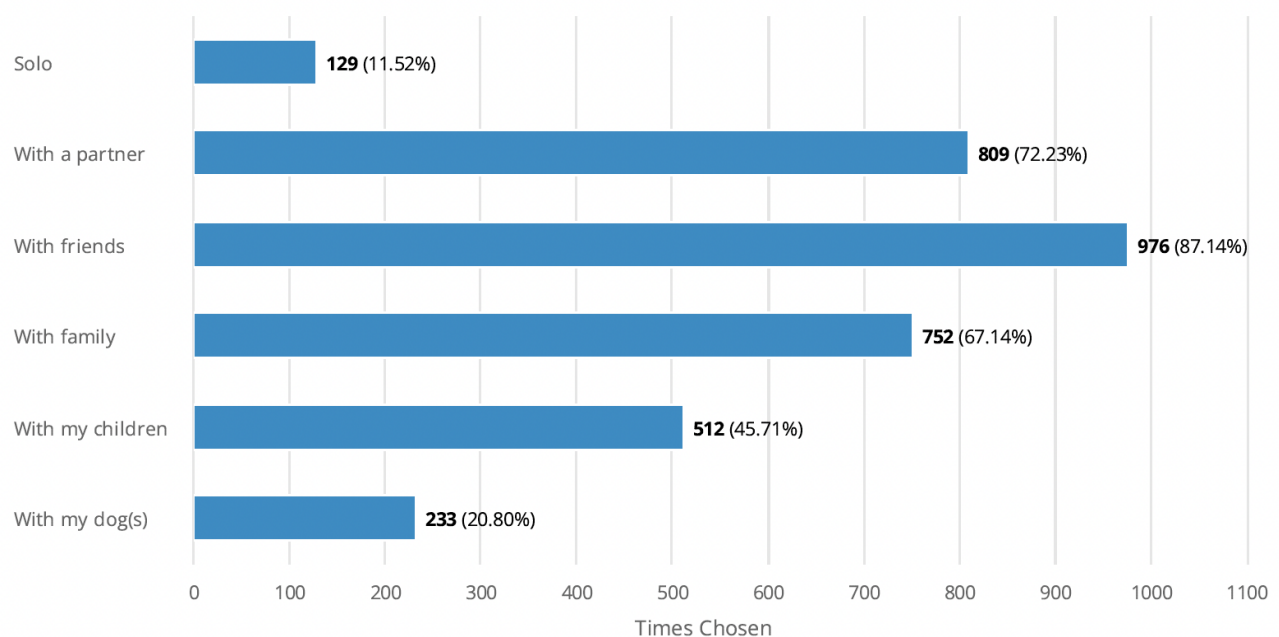


Chart 5. "Would you like to visit Froth Craft Brewery Geraldton?" question and answers in the Applicant's survey

Of the 1,120 respondents who answered the question concerning who they would like to visit Froth Craft Brewery Geraldton with:

- 752 respondents (67.14%) indicated that they would visit with family; and
- 512 respondents (45.71%) specifically indicated that they would visit with their children.

Respondents were permitted to select more than one response.

These results demonstrate that family use of the Premises is not merely an assumption made by the Applicant on the basis of demographic statistics. More than two-thirds of respondents expressly envisage attending with family and almost half envisage attending with children.

The Applicant has responded directly to that expressed community preference through the proposed design and operating model, including substantial food availability, family-suitable indoor and outdoor dining areas and a dedicated children's playground.

Importantly, the Applicant does not rely upon family attendance as a harm-minimisation measure in itself. The presence of families does not remove the risks associated with the sale and consumption of liquor. Rather, the survey establishes that families are an identifiable community group which intends to use the Premises and whose needs, safety and amenity therefore warrant specific consideration.

5.8.3 Existing Family-Oriented Licensed Hospitality within the 3 km Locality

The Applicant has considered the existing availability of family-oriented licensed hospitality within the 3 km locality surrounding the Premises.

Geraldton has a range of pubs, taverns, bars, breweries and other licensed hospitality venues, and a number expressly accommodate or promote themselves to families. The Applicant therefore does not contend that Geraldton families presently have no access to licensed dining or hospitality venues.

The Applicant's research does, however, identify a material distinction between venues which permit or welcome family attendance and venues which provide dedicated recreational infrastructure for children as part of the licensed hospitality experience.

The Applicant conducted a review of current comparable licensed hospitality venues within approximately 3 km of 1 Cathedral Avenue, including pubs, taverns, bars, brewery and distillery venues and other comparable licensed hospitality operations. The Applicant's review identified a range of current operating licensed hospitality venues within that approximately 3 km area.

The Applicant's review of current comparable licensed hospitality venues within approximately 3 km of the Premises identified a range of existing licensed hospitality venues, but publicly available venue information identified only one existing venue within that locality with a dedicated children's playground or play area. Tarcoola Tavern expressly provides a children's play area incorporating a sandpit, tugboat climbing feature, grassed area and games.³³

Other licensed venues within the locality demonstrate that family-friendly hospitality is available, but generally without a dedicated children's playground.

The Murchison Tavern expressly promotes a family pub experience and provides a children's menu, but its published venue facilities do not identify a children's playground.³⁴

Batavia Brewing provides a dedicated children's menu and operates under a Tavern Licence, but no dedicated children's play facility is identified in its published venue information.³⁵

The Foreshore Hangout Lounge is identified by Australia's Coral Coast as both family-friendly and fully licensed, and provides a children's menu and lawn games; however, its detailed published facilities do not identify a dedicated children's playground.³⁶

Old Man & the Sea Rooftop Bar is similarly identified as family-friendly and fully licensed and currently promotes a children's dining offer, but no dedicated children's playground is identified in its published facilities.³⁷

Other comparable venues within the locality include Bob's Boutique Bar, the Provincial Bar, Sirocco Bar & Café, Blue Healers Square, the Freemasons Hotel, Geraldton Hotel, 30 Knots Distillery and The Broady. While some of these premises accommodate families or provide children's menus or activities, the Applicant did not identify a dedicated children's playground in their publicly available venue information.

The broader Geraldton area provides further context. The Wintersun Hotel, approximately 4.5 km from the proposed Premises and therefore outside the 3 km locality, expressly provides an indoor children's playground.³⁸

Independent local tourism material also identifies the Wintersun Hotel and Tarcoola Tavern as pubs with onsite playgrounds.³⁹

The Applicant considers this independent tourism material consistent with its research that dedicated children's play facilities are comparatively limited within Geraldton's licensed hospitality offering and, in particular, within the 3 km locality surrounding the proposed Premises.

5.8.4 Relationship with the Geraldton Foreshore

The location of the proposed Premises is particularly relevant to the proposed family-oriented offering. The Premises is situated immediately adjacent to the Geraldton Foreshore, which the City of Greater Geraldton actively promotes as a significant family recreation destination.⁴⁰ The foreshore contains public playground infrastructure, an enclosed waterpark, recreational open space and the Youth Precinct, together with cafés and other facilities serving residents and visitors.

The proposed Froth venue will therefore not introduce family activity into an area otherwise unrelated to children or recreation. Rather, it will operate adjacent to an established public environment already extensively used by families.⁴¹

What is comparatively less common within the immediate hospitality offering is the combination proposed by Froth: a substantial licensed dining and social venue incorporating its own dedicated children's playground as part of the premises.

The Applicant considers that this provides a complementary hospitality use within the existing family-oriented foreshore environment.

5.8.5 Community Benefit for Parents and Families

The Applicant considers that the family-oriented design provides a broader community benefit by enabling parents, carers and other responsible adults to participate in Geraldton's dining and social environment together with their children.

A family-friendly licensed hospitality venue can allow a broader section of the community to dine, meet and socialise without requiring parents and carers to choose between participating in those activities and accommodating the recreational needs of younger family members.

The Applicant considers this particularly relevant given the direct survey evidence. Of the 1,120 respondents to the relevant question, 67.14% indicated that they would visit with family and 45.71% specifically indicated that they would visit with children.

The proposed children's playground, substantial food offering and family-suitable indoor and outdoor areas therefore respond to an expressly identified community preference rather than being included solely as a commercial amenity.

The Applicant does not suggest that the provision of family facilities is itself a harm-minimisation measure or that family attendance removes risks associated with liquor. These facilities instead form part of the broader hospitality and community benefit of the proposal, while the particular risks arising from children being present within licensed premises are separately and comprehensively addressed in Section 5.4.

5.8.6 Responding to Different Community Expectations

The Applicant's consultation also demonstrated that community expectations concerning family-friendly hospitality are not uniform.

While many survey respondents supported children's facilities and family-friendly spaces, some respondents expressed preferences for areas or circumstances in which children or dogs were not present.

The Applicant considers this feedback important because it demonstrates that different groups using the Premises may have differing expectations concerning atmosphere and amenity.

The Applicant does not interpret "family-friendly" to mean that every area of the Premises will operate as a children's environment or that the comfort and amenity of adult patrons should be diminished.

Rather, the intention is to provide an inclusive hospitality venue capable of accommodating families alongside couples, friendship groups, tourists and other adult patrons. The design, layout and ongoing management of the Premises will therefore seek to appropriately manage the interaction between children's recreational areas, dining areas, the outdoor beer garden and other patron areas.

Management will monitor the operation of those areas and respond where their use creates avoidable safety, supervision or amenity concerns.

The Applicant considers that acknowledging these differing views strengthens rather than detracts from the consultation evidence, as it demonstrates that the Applicant has considered both supportive and contrary community expectations.

5.8.7 Family-Oriented Design and Manner of Trade

The proposed physical design and manner of trade have been developed with the anticipated family patronage in mind.

The Premises will provide indoor dining and social areas, an outdoor beer garden, a dedicated children's playground, substantial food available throughout trading hours, free drinking water and non-alcoholic beverage choices.

The family-oriented component of the venue will centre upon food, outdoor space, recreation, social interaction and the playground rather than upon liquor promotion.

This distinction is particularly important in light of the matters considered in Section 5.4 concerning children's exposure to alcohol-related stimuli.

The Applicant does not propose to use the children's playground, children's menus or family facilities as vehicles for alcohol advertising. Children will not be provided with alcohol-branded games or arcade-style attractions and venue screens will not operate as continuous displays promoting beer or alcohol consumption.

The objective is therefore not simply to permit children within licensed premises, but to create a broader hospitality environment in which families can comfortably dine and socialise while the licensed component of the operation remains appropriately controlled.

5.8.8 Foreseeable Risks and Management

The Applicant recognises that actively accommodating families within licensed premises creates responsibilities as well as benefits.

Potential issues include exposure of children to intoxicated or disorderly behaviour, supervision of minors, attempted supply of liquor to minors, interaction between children's recreational areas and liquor-service areas, different expectations between family groups and other patrons, and inappropriate alcohol-focused advertising or promotion.

These issues are considered comprehensively in Section 5.4 – Children and Young People and are not unnecessarily repeated here.

More broadly, the Applicant considers that families using the Premises should be able to do so without being subjected to an environment characterised by excessive intoxication, aggressive behaviour or uncontrolled liquor consumption.

The family-oriented operation will therefore be supported by the broader controls detailed throughout this Assessment, including food throughout trading hours, appropriately trained staff, strict RSA, active monitoring of intoxication and patron behaviour, age-verification procedures, free drinking water, low- and non-alcoholic alternatives, responsible liquor promotion, appropriate security and incident-management procedures.

The Applicant considers that describing licensed premises as family-friendly creates an operational expectation which must be demonstrated through the manner in which the venue is actually managed.

5.8.9 Applicant's Experience Operating Family-Friendly Licensed Venues

The proposed model is not new or untested for the Applicant.

Froth Craft Brewery Geraldton will be the group's fourth venue. The existing Froth venues in Exmouth, Bunbury and North Beach provide the Applicant's directors with practical experience operating licensed hospitality venues in which children, families, couples, adult friendship groups and other patrons use the same premises.

Those venues provide practical experience in managing family dining, liquor service, minors, entertainment, patron behaviour, busy trading periods, supervision requirements and the interaction between family-oriented spaces and general licensed patron areas.

The Applicant's proposed Geraldton controls therefore do not rely solely upon assumptions made prior to commencement of trade. Geraldton will apply the experience developed through the existing Froth operations to the particular physical layout, community characteristics and patron profile of the proposed Premises.

5.8.10 Ongoing Monitoring

The Applicant recognises that the effectiveness of the proposed family-oriented arrangements will ultimately need to be assessed through actual operating experience.

Management will monitor the children's playground and family areas, interaction between patron groups, supervision issues, complaints, incidents and recurring matters affecting patron safety or amenity.

Where experience demonstrates that an aspect of the layout or operation is creating an avoidable issue, the Applicant will consider appropriate adjustments to staffing, supervision, furniture or patron-area management, signage, entertainment arrangements or other operational procedures.

This approach is consistent with the broader adaptive-management framework described in Section 5.7.

Families comprise a substantial component of the Geraldton community and the Applicant's community consultation provides direct evidence of strong anticipated family use of the proposed Premises. Of the 1,120 respondents to the relevant survey question, 67.14% indicated that they would visit with family and 45.71% specifically indicated that they would visit with their children.

The Applicant's 3 km locality review provides further context. While a number of existing licensed venues accommodate or promote themselves to families, dedicated children's recreational facilities are comparatively uncommon. Of 13 current comparable licensed hospitality venues identified within approximately 3 km of the Premises, the Applicant's review of publicly available venue information identified only one existing venue with a dedicated children's playground or play area.

The proposed Froth venue will therefore add a comparatively uncommon combination of licensed hospitality, substantial food service, indoor and outdoor family dining and a dedicated children's playground within an especially prominent location immediately adjacent to Geraldton's existing family-oriented foreshore recreational precinct.

The Applicant does not rely upon this distinction to suggest that the grant of a Tavern Licence is justified merely because a playground is proposed, nor does it contend that Geraldton presently lacks family-friendly hospitality. Rather, the evidence demonstrates a particular community demand and a relative gap in the type of integrated family-oriented licensed hospitality experience proposed by the Applicant.

At the same time, the Applicant recognises that actively encouraging families and children to use licensed premises creates particular responsibilities concerning minors, supervision, intoxication, patron behaviour, exposure to alcohol-related stimuli, responsible promotion of liquor and differing patron expectations.

Those matters have been expressly considered in Section 5.4 and throughout this Assessment and will be managed through the Applicant's broader RSA and harm-minimisation framework.

The Applicant's demonstrated experience operating family-friendly licensed venues in Exmouth, Bunbury and North Beach provides further support for its capacity to implement those measures in practice.

Having regard to Geraldton's family demographic, the direct community-survey evidence, the existing availability of comparable facilities within the 3 km locality, the proposed location and manner of trade, the identified risks and corresponding controls and the Applicant's established operating experience, the Applicant considers that Froth Craft Brewery Geraldton will provide a meaningful additional family-oriented dining, social and recreational hospitality option within the Geraldton CBD and foreshore precinct while operating consistently with the harm-minimisation and public-interest objectives of the Liquor Control Act 1988 (WA).

5.9 Demographic Profile of Geraldton

The Applicant has considered the demographic characteristics of the community surrounding the proposed Premises as part of its assessment of the likely patron population, community requirements and potential social impacts associated with the proposed Tavern Licence.

The statutory locality adopted for this Assessment is the area within a 3 km radius of the Premises at 1 Cathedral Avenue. Australian Bureau of Statistics Census geographies do not correspond precisely with that circular 3 km locality. Accordingly, the Applicant has used available ABS geographic areas, principally the City of Greater Geraldton local government area and Geraldton urban-area data, as contextual demographic evidence rather than representing those datasets as exact measurements of the statutory locality.

Demographic matters already considered in greater detail elsewhere in this Assessment, including children and young people, Aboriginal people and communities, families and the Applicant's target client base, are not unnecessarily repeated in this section.

5.9.1 Population and Community Profile

The 2021 Census recorded 39,489 persons within the City of Greater Geraldton, comprising 49.4% males and 50.6% females. The median age was 40 years.⁴²

The Geraldton Urban Centre and Locality, which provides a more geographically focused representation of the Geraldton urban population, recorded 32,717 persons and also had a median age of 40 years.⁴³

More recent evidence considered in Section 5.2 demonstrates that Greater Geraldton has experienced material population and migration growth since the 2021 Census. The Applicant therefore recognises that Census figures provide a detailed demographic baseline rather than a current estimate of the total population.

The demographic evidence identifies Geraldton as a substantial regional urban centre rather than a small or narrowly constituted community. Its population includes families with children, working-age adults, older residents, Aboriginal people, people from culturally diverse backgrounds and workers across a broad range of occupations and industries.

This diversity is relevant to the proposed Premises because Froth Craft Brewery Geraldton is intended to operate as a broad hospitality venue rather than a premises directed toward a narrow patron demographic.

5.9.2 Age Profile

The age profile of Greater Geraldton demonstrates a broad distribution across children, younger adults, working-age residents and older persons.

The 2021 Census recorded⁴⁴:

Table 3. Age Profile in Greater Geraldton

Age group	Persons	Approximate proportion
0–14 years	7,864	19.9%

15–24 years	4,580	11.6%
25–44 years	9,550	24.2%
45–64 years	10,539	26.7%
65 years and over	6,970	17.6%

The median age of 40 years was slightly above the Western Australian median of 38 years.

The age profile is relevant to the proposed manner of trade because it demonstrates that the Geraldton community is not dominated by a single age cohort. There is a substantial working-age and mature-adult population, together with significant numbers of children and older residents.

The Applicant's own community survey provides more specific evidence concerning anticipated patrons of the proposed Premises. As addressed in Section 5.3, 64.7% of respondents to the relevant survey question were aged between 31 and 55 years and 75.9% were aged between 26 and 55 years.

The Applicant does not rely upon the age profile as a harm-minimisation measure. Rather, the demographic evidence assists in identifying the community within which the Premises will operate and supports the proposed broad hospitality model incorporating food, social dining, family facilities, craft beer, entertainment and non-alcoholic alternatives.

5.9.3 Income and Household Characteristics

The 2021 Census recorded a median weekly household income of \$1,536 within Greater Geraldton, compared with \$1,815 across Western Australia.⁴⁵ Median personal weekly income was \$777 and median family weekly income was \$2,003.

The Census also recorded:

- 17,969 private dwellings;
- an average household size of 2.4 persons;
- median monthly mortgage repayments of \$1,519;
- median weekly rent of \$260; and
- an average of 2.0 motor vehicles per dwelling.

These figures demonstrate that the Geraldton community encompasses households with differing financial circumstances. The Applicant does not interpret median income data as establishing the spending behaviour or vulnerability of individual patrons.

Socioeconomic disadvantage and the particular potential impacts of the proposed licence upon lower-income and disadvantaged members of the community are considered separately in Sections 5.11 and 5.12.

The relevance of the income and household data in this section is therefore primarily to demonstrate the diversity of the community within which the proposed Premises will operate.

5.9.4 Employment and Workforce Profile

Geraldton functions as the principal employment, service and commercial centre for the Mid West and supports a diverse workforce.

At the 2021 Census, 18,941 Greater Geraldton residents aged 15 years and over reported being in the labour force. Of those reporting labour-force status:

- 56.2% worked full-time;
- 32.2% worked part-time; and
- 5.2% were unemployed.

The occupational profile was diverse. The largest occupational groups included professionals (16.9%), technicians and trades workers (16.8%), community and personal service workers (13.5%), labourers (11.4%), clerical and administrative workers (11.3%), managers (10.5%), machinery operators and drivers (9.2%) and sales workers (9.0%).⁴⁶

Major individual industries of employment included hospitals, primary education, supermarkets and grocery stores, iron ore mining and social assistance services.

The Census also recorded that 24.8% of employed residents worked 45 hours or more during the week preceding Census Night, compared with 22.6% across Western Australia.

The workforce data is relevant because it demonstrates that Geraldton is not simply a tourism or resource-industry community. It supports a broad resident workforce spanning health, education, trades, resources, retail, community services, administration and other sectors.

The proposed Premises is intended to cater to this broad community through daytime and evening hospitality, food, social occasions, entertainment and beverage offerings rather than being targeted exclusively toward any particular occupational group.

The particular circumstances of mining and itinerant workers are considered separately in Section 5.13.

5.9.5 Relevance to the Proposed Tavern Licence

The demographic evidence demonstrates that Geraldton is a substantial and diverse regional community containing significant populations of families, children, mature adults, older residents, Aboriginal people, culturally diverse residents and people employed across a broad range of industries.

The Applicant has considered those characteristics throughout this Public Interest Assessment rather than relying upon demographic information simply to demonstrate commercial demand.

In particular, the demographic profile has informed consideration of:

- the anticipated target client base and manner of trade;
- children and young people;
- Aboriginal people and communities;
- families;
- people experiencing socioeconomic disadvantage;
- migrant and culturally diverse communities;
- mining and itinerant workers;
- the provision of food, non-alcoholic alternatives and family facilities;
- responsible service, patron management and harm minimisation; and
- the broader community and hospitality benefits of the proposed Premises.

The Applicant recognises that demographic characteristics do not determine how any individual will consume liquor or behave within licensed premises. The purpose of considering these characteristics is instead to identify the composition of the community which may be affected by or make use of the proposed Premises and to ensure that foreseeable risks and community requirements have been considered.

Having regard to the demographic evidence, the Applicant considers that the proposed broad, food-focused and family-oriented manner of trade is appropriate to the diverse character of Geraldton.

The Premises is not intended to be directed principally toward a narrow age group, occupational category or socioeconomic group. It is intended to provide a dining, social and recreational hospitality venue capable of serving a broad cross-section of residents and visitors, subject in all cases to the responsible service, patron-management and harm-minimisation measures described throughout this Assessment.

5.10 Migrant Groups and Culturally Diverse Communities

The Applicant has considered the cultural and linguistic diversity of the Geraldton community and the potential implications of the proposed Tavern Licence for people from migrant and culturally diverse backgrounds.

The Applicant does not consider migrant status, country of birth or cultural background to be an indicator of alcohol-related risk. Rather, these characteristics are relevant to ensuring that the proposed Premises is accessible to the diverse community it is intended to serve and that matters including responsible service of alcohol, identification requirements, patron behaviour and venue requirements are communicated clearly, consistently and without discrimination.

Cultural diversity is familiar to the Applicant through the operation of its existing venues. Across Froth Craft Brewery's Exmouth, Bunbury and North Beach venues, the group employs staff from a wide range of national and cultural backgrounds and serves a similarly diverse patron population.

As explained in Section 5.9, the statutory locality adopted for this Assessment is the area within a 3 km radius of the Premises. ABS Census boundaries do not correspond precisely with that circular locality. The City of Greater Geraldton data below is therefore used as contextual demographic evidence concerning the broader community served by the Premises.

5.10.1 Cultural Diversity within Greater Geraldton

The 2021 Census recorded 39,489 persons within the City of Greater Geraldton. Of those residents, 30,222 (76.5%) were born in Australia.⁴⁷ The most commonly reported overseas countries of birth were:

Table 4. Overseas Countries of Birth of Geraldton Residents

Country of birth	Persons	% of Greater Geraldton population
England	1,490	3.8%
New Zealand	689	1.7%
South Africa	481	1.2%

Philippines	469	1.2%
India	223	0.6%

Country of birth does not, by itself, capture the full cultural diversity of the community. The Census also recorded that 7,184 residents (18.2%) had both parents born overseas, while a further 4,724 residents had one parent born overseas.

These figures demonstrate that people from migrant and culturally diverse backgrounds form an established component of the Greater Geraldton community and can reasonably be expected to form part of the patron population of the proposed Premises.

5.10.2 Language Diversity

The 2021 Census recorded English as the only language used at home by 32,606 Greater Geraldton residents, representing 82.6% of the population.⁴⁸ The most commonly reported languages other than English were:

Table 5. Languages Spoken in Greater Geraldton

Language	Persons	% of Greater Geraldton population
Afrikaans	283	0.7%
Malay	281	0.7%
Tagalog	203	0.5%
Italian	159	0.4%
Vietnamese	154	0.4%

The Census separately recorded 1,411 households in which a non-English language was used, representing 9.8% of households.

These figures do not suggest that significant language barriers will necessarily arise at the Premises. They do, however, demonstrate that staff may interact with patrons for whom English is not their first or preferred language.

This is already a familiar aspect of the Applicant's operations. The Froth group employs staff from diverse national and linguistic backgrounds and serves patrons from similarly diverse backgrounds across its existing venues.

5.10.3 Potential Considerations for Licensed Premises

The Applicant has considered whether cultural or linguistic differences could give rise to foreseeable issues in the operation of the Premises.

Potential circumstances include:

- difficulty understanding venue rules, signage or conditions of entry;
- difficulty communicating identification requirements or reasons for refusal of liquor service;
- misunderstandings concerning RSA decisions or requirements to leave the Premises;
- differing levels of familiarity with Australian liquor licensing and responsible-service requirements;
- communication difficulties where a patron requires transport, medical assistance or other welfare support; and
- the need to ensure that identification, RSA and behavioural requirements are applied consistently and without discrimination.

The Applicant considers that these matters are appropriately addressed through responsible hospitality management, clear communication and appropriately trained staff rather than assumptions concerning particular cultural groups.

5.10.4 Responsible Service and Communication

All patrons will be subject to the same requirements concerning age verification, responsible service of alcohol, intoxication, behaviour and conditions of entry irrespective of nationality, country of birth, language or cultural background.

Where a patron appears not to understand an instruction, identification requirement or RSA decision, staff will, where reasonably practicable, communicate the requirement clearly and respectfully. Straightforward language will be used when explaining matters such as identification requirements, refusal of service, behavioural expectations and requirements to leave the Premises.

Where communication difficulties arise, assistance may be sought from another staff member or manager where appropriate. The diversity of the Froth workforce may also assist in circumstances where another staff member is better able to communicate with a patron, although the Applicant does not rely upon the availability of staff speaking any particular language as a formal harm-minimisation measure.

These procedures will not alter the Applicant's obligations under the Liquor Control Act 1988 (WA). Where liquor service must be refused, satisfactory identification is required or other intervention is necessary, those requirements will continue to be applied.

5.10.5 Inclusive and Non-Discriminatory Operation

Froth Craft Brewery Geraldton is intended to operate as an inclusive community hospitality venue accessible to residents and visitors from a broad range of backgrounds.

The Applicant will not target, exclude or treat patrons differently on the basis of nationality, ethnicity, language or cultural background. RSA decisions and behavioural requirements will instead be based upon individual circumstances and observed behaviour.

Staff will be expected to apply venue standards consistently and objectively while communicating decisions respectfully. The Applicant considers this approach particularly important where staff are required to exercise judgement concerning intoxication, identification or patron behaviour.

5.10.6 Applicant's Operational Experience

The proposed approach is supported by the Applicant's practical experience operating licensed hospitality venues in Exmouth, Bunbury and North Beach.

Across these venues, the Froth Craft Brewery group employs staff from a wide range of national and cultural backgrounds. The venues also attract a diverse patron base comprising local residents, domestic visitors and international tourists.

The Applicant's directors and management teams therefore have substantial practical experience operating hospitality environments in which cultural and linguistic diversity forms part of normal day-to-day trade. This includes applying RSA, identification requirements, patron-management procedures and behavioural standards consistently across a diverse patron population.

This experience will inform recruitment, staff training and management practices at Froth Craft Brewery Geraldton and provides an established operational framework for maintaining responsible liquor service within a welcoming and inclusive hospitality environment.

Migrant and culturally diverse residents form an established part of the Greater Geraldton community and can reasonably be expected to form part of the patron population of the proposed Premises.

The Applicant has identified communication, identification, RSA and patron welfare as the principal practical considerations arising from a culturally diverse patron population. These matters will be addressed through trained staff, clear and respectful communication, consistent application of venue requirements and non-discriminatory patron management.

The Applicant's existing culturally diverse workforce and patron base across Exmouth, Bunbury and North Beach also provide practical experience in managing these matters. The Applicant therefore considers that the proposed Premises can appropriately serve Geraldton's culturally diverse community while maintaining effective RSA, patron-management and harm-minimisation standards.

5.11 People of Low Socioeconomic Status and People Experiencing Disadvantage

The Applicant has considered the socioeconomic characteristics of the Geraldton community and the potential impact of the proposed Tavern Licence upon people experiencing lower incomes or socioeconomic disadvantage.

The Applicant does not assume that a person's income, employment status or socioeconomic circumstances determine their drinking behaviour or likelihood of experiencing alcohol-related harm. However, the Applicant recognises that excessive alcohol consumption can compound existing financial, health and social difficulties and that the manner in which liquor is priced, promoted and supplied can be particularly relevant where patrons are experiencing financial disadvantage.

Accordingly, the Applicant has considered both the socioeconomic characteristics of Greater Geraldton and the practical measures by which the proposed Premises can minimise foreseeable alcohol-related harm.

5.11.1 Socioeconomic Profile of Greater Geraldton

As identified in Section 5.9, the 2021 Census recorded a median weekly household income of \$1,536 within Greater Geraldton, compared with \$1,815 across Western Australia. Median personal weekly income was \$777 and median family weekly income was \$2,003.⁴⁹

The Census also recorded that 20.1% of Greater Geraldton households for which household income could be determined had a total weekly household income below \$650, compared with 16.3% across Western Australia.

These figures demonstrate that the community served by the proposed Premises encompasses households across a broad range of financial circumstances, including people experiencing lower incomes and potential socioeconomic disadvantage.

The Applicant does not interpret area-level or household-income data as establishing the circumstances or vulnerability of individual patrons. Rather, the evidence is relevant to ensuring that the potential impact of the proposed licence upon people experiencing socioeconomic disadvantage is expressly considered.

5.11.2 SEIFA and Relative Socioeconomic Disadvantage

The Australian Bureau of Statistics also publishes the Socio-Economic Indexes for Areas (SEIFA), which provide area-based measures of relative socioeconomic advantage and disadvantage.

SEIFA incorporates a range of characteristics rather than income alone. The Index of Relative Socio-Economic Disadvantage (IRSD), for example, considers factors including low household income, unemployment, lower educational attainment, low-rent housing, labouring occupations and families with children experiencing parental joblessness.⁵⁰

The Applicant considers SEIFA useful as contextual evidence that socioeconomic circumstances vary within communities. However, SEIFA is an area-based measure and does not identify the circumstances of individual residents or patrons. The Applicant therefore does not use an area's SEIFA ranking to infer that a particular person is disadvantaged or at increased risk of alcohol-related harm.⁵¹

This distinction is particularly relevant to Greater Geraldton, which contains a diverse population and workforce encompassing differing income levels, occupations, employment circumstances and household characteristics.

5.11.3 Employment and Economic Diversity

The employment profile considered in Section 5.9 further demonstrates the socioeconomic diversity of Greater Geraldton.

At the 2021 Census, 18,941 Greater Geraldton residents aged 15 years and over reported being in the labour force. The workforce included professionals, technicians and trades workers, community and personal service workers, labourers, clerical and administrative workers, managers, machinery operators and drivers, and sales workers. Major individual industries included hospitals, primary education, supermarkets and grocery stores, iron ore mining and social assistance services.

The Applicant considers this diversity important. Geraldton should not be characterised simply as either an affluent resource community or a disadvantaged regional community. It contains residents across a broad range of occupations, incomes and socioeconomic circumstances.

Froth Craft Brewery Geraldton is similarly intended to serve a broad cross-section of the community rather than being directed toward any particular income or occupational group.

5.11.4 Potential Harm Considerations

The Applicant has considered the circumstances in which the operation of licensed premises could potentially contribute to harm affecting people experiencing socioeconomic disadvantage.

Relevant considerations include:

- financial harm arising from excessive expenditure on liquor;
- pricing or promotions that encourage patrons to purchase or consume greater quantities of liquor than they otherwise would;
- low-cost or high-volume liquor offerings designed to encourage excessive consumption;
- intoxication compounding existing financial, health, housing, family or social difficulties;
- vulnerable or intoxicated patrons remaining at or around the Premises without appropriate assistance;
- the potential for alcohol-related behaviour to affect surrounding public areas; and
- the availability of takeaway liquor and its potential contribution to alcohol-related harm away from licensed premises.

The Applicant considers that these risks should be addressed through the manner in which the Premises operates rather than by seeking to exclude or make assumptions about patrons on the basis of their perceived financial circumstances.

5.11.5 Manner of Trade and Responsible Pricing

Froth Craft Brewery Geraldton is proposed as a food-focused craft brewery and hospitality venue rather than a premises principally directed toward low-cost or high-volume liquor consumption.

The commercial offering will centre upon locally produced craft beer, food, dining, social occasions, entertainment and the broader hospitality experience. A substantial food menu will be available throughout trading hours, together with free drinking water and a meaningful range of low- and non-alcoholic beverages.

The Applicant does not intend to adopt pricing or promotional practices designed to encourage rapid or excessive consumption. The business model will not depend upon very cheap liquor, high-volume discounting or promotions that reward patrons for consuming excessive quantities of alcohol.

The Applicant does not rely upon price alone as a harm-minimisation measure. Nor does the Applicant suggest that people experiencing financial disadvantage should be discouraged from attending the Premises. Froth Craft Brewery Geraldton is intended to remain accessible to a broad cross-section of the Geraldton community.

The relevant consideration is that pricing and promotions will be managed responsibly and will not be used as mechanisms to encourage harmful consumption.

5.11.6 Takeaway Liquor

The Applicant has also considered the potential relationship between socioeconomic disadvantage and the availability of packaged liquor for consumption away from licensed premises.

The Applicant does not propose to operate the Premises as a bottle shop or general packaged-liquor outlet. Any takeaway liquor sales are intended to be limited to products manufactured by the Applicant or its associated Froth Craft Brewery entity, Froth Craft Brewery Bunbury, with takeaway craft beer

expected to be sold predominantly through growler fills. The Applicant does not propose to sell takeaway packaged liquor manufactured by unrelated third-party producers.

The Applicant would accept an appropriate licence condition restricting takeaway liquor sales accordingly. This limitation is relevant because the grant of the Tavern Licence will not establish an additional general packaged-liquor retailer within the locality or create a new outlet offering the broad range of low-cost, high-volume packaged liquor products commonly associated with general bottle-shop retailing.

The Applicant nevertheless recognises that restricted takeaway sales do not eliminate alcohol-related risk. Takeaway liquor will remain subject to appropriate RSA, age-verification and responsible-sale procedures.

5.11.7 Responsible Service and Patron Welfare

Responsible service and patron-management requirements will apply equally to all patrons irrespective of their income, employment, housing circumstances or perceived socioeconomic status.

Staff and management will actively monitor patron behaviour and signs of intoxication, refuse liquor service where required, provide ready access to food and drinking water and respond appropriately where a patron's behaviour or condition raises concerns for their welfare.

The Applicant will also avoid promotions designed to encourage rapid or excessive consumption and will maintain incident-management and patron-welfare procedures consistent with the broader harm-minimisation measures described throughout this Assessment.

Importantly, staff will not be expected to make assumptions about a patron's capacity to purchase liquor based upon appearance, occupation or perceived financial circumstances. Intervention will instead be based upon observable behaviour, intoxication, responsible-service requirements and other relevant individual circumstances.

This approach allows people across the socioeconomic spectrum to access the Premises while maintaining consistent and non-discriminatory harm-minimisation standards.

The Applicant recognises that Greater Geraldton contains residents across a broad range of socioeconomic circumstances and that excessive alcohol consumption can compound existing financial, health and social disadvantage.

The proposed Premises will address these foreseeable risks through its food-focused manner of trade, responsible pricing and promotion, restricted takeaway offering, trained staff, RSA, active patron monitoring and ready availability of food, water and non-alcoholic alternatives.

These controls will apply consistently to all patrons without assumptions or discrimination based upon perceived socioeconomic status. The Applicant considers that the Premises can therefore serve a broad cross-section of the Geraldton community while appropriately managing the potential for alcohol-related harm affecting people experiencing socioeconomic disadvantage.

5.12 Mining, Resources and FIFO/DIDO Workers

Geraldton is an important service and transport centre for the Mid West resources industry and also functions as a point of origin for fly-in, fly-out (FIFO) and other working-away-from-home arrangements.

The Applicant has therefore considered resource-sector and FIFO/DIDO workers as a component of the potential patron population of Froth Craft Brewery Geraldton.

The Applicant does not consider employment in the mining or resources sector, or participation in FIFO/DIDO work, to be an indicator that an individual patron will consume liquor irresponsibly. However, the particular working arrangements associated with working away from home have been identified by government as presenting wellbeing and alcohol-related considerations that are appropriate to recognise when assessing the operation of licensed premises.

5.12.1 Geraldton's Role as a Regional Resources and FIFO Hub

The Mid West Development Commission identifies Geraldton as the major service hub for the Mid West, accommodating the majority of the region's population, public services and businesses and performing an important "hub and spoke" role in supporting communities and industries throughout the region.⁵²

Mining is now a leading component of the Mid West economic mix, alongside agriculture, fishing, manufacturing, energy and other industries.⁵³

There is also direct evidence of Geraldton's role in FIFO activity.

Geraldton Airport, operated by the City of Greater Geraldton, states that in addition to scheduled passenger services it accommodates general aviation charter services and FIFO charter flights to regional Western Australia.⁵⁴ The Airport's Greenough Terminal is used by regional airlines undertaking FIFO charter operations.⁵⁵

Rio Tinto also identifies Geraldton as one of its regional FIFO hubs. Its current Western Australian operations material identifies Geraldton alongside other regional FIFO locations, and current recruitment material includes FIFO employment opportunities involving direct travel from Geraldton to Pilbara operations.⁵⁶

The Applicant therefore considers it reasonable to expect that resource-sector employees, contractors and persons engaged in FIFO, DIDO or other working-away arrangements will form part of the potential patron population of the Premises.

5.12.2 Relevant Wellbeing and Alcohol-Related Considerations

The Applicant has considered available government evidence concerning the particular circumstances associated with FIFO and working-away-from-home employment.

Western Australian Government guidance recognises that FIFO working arrangements can involve psychosocial factors including extended periods away from family and community, work demands, fatigue, isolation and difficulties associated with transitioning between work and home environments.

The State has consequently developed specific guidance concerning mentally healthy workplaces for FIFO workers and provides a dedicated Working Away Alcohol and Drug Support Line for FIFO workers, their families and other working-away-from-home communities.⁵⁷

Government-commissioned research has also identified higher levels of psychological distress among FIFO workers than non-FIFO workers, while alcohol and other drug misuse has been recognised as a potential risk factor requiring appropriate management within FIFO populations.⁵⁷

The Applicant does not rely upon this evidence to suggest that FIFO or resource-sector workers generally engage in harmful drinking. The evidence instead identifies circumstances that justify ensuring that responsible service, intoxication management and patron welfare measures are applied effectively to this component of the community, as they are to all patrons.

5.12.3 Potential Considerations for the Premises

In considering the potential patronage of mining, resources and working-away-from-home employees, the Applicant has identified the following foreseeable matters:

- patrons attending the Premises during periods of leave or between work rotations;
- the potential for extended social occasions involving alcohol;
- rapid or excessive consumption where a patron has significant periods of leisure time;
- the interaction between alcohol consumption, fatigue or other wellbeing factors;
- patrons unfamiliar with Geraldton requiring assistance with transport or accommodation;
- intoxicated or vulnerable patrons requiring appropriate welfare assistance; and
- the need to ensure that occupational background or apparent financial capacity does not influence RSA decisions or standards of service.

These considerations are not unique to resource workers and may arise in relation to any patron. Their identification nevertheless demonstrates that the Applicant has considered the characteristics of this identifiable component of Geraldton's workforce rather than assuming that the proposed venue model removes all potential risk.

5.12.4 Manner of Trade and Harm-Minimisation Measures

Froth Craft Brewery Geraldton is not proposed as a late-night nightclub or premises principally dependent upon rapid or high-volume alcohol consumption.

Its manner of trade will centre upon craft beer, substantial food service, dining, social occasions, family attendance, entertainment and community use.

Relevant controls will include:

- food being available throughout trading hours;
- responsible liquor pricing and promotions that do not encourage rapid or excessive consumption;
- appropriately trained RSA staff;
- active monitoring of patron behaviour and intoxication;
- refusal of service where required;
- free drinking water and a meaningful range of low- and non-alcoholic beverages;
- appropriate management of patrons who appear fatigued, intoxicated or otherwise vulnerable;
- incident-management procedures;
- security appropriate to patron numbers, entertainment and operating circumstances; and
- reasonable assistance with safe departure and transport where required.

These controls will apply to resource-sector and FIFO/DIDO workers in exactly the same manner as they apply to every other patron.

5.12.5 Responsible and Non-Discriminatory Patron Management

The Applicant considers it important that recognition of published evidence concerning FIFO worker wellbeing does not result in stereotyping individual patrons.

Staff will not assume that a person is at greater risk of intoxication because they work in mining, participate in FIFO/DIDO employment, wear work clothing or are perceived to have significant disposable income.

RSA decisions will instead be based upon observed consumption, behaviour, signs of intoxication and the individual circumstances presented at the time.

Similarly, the Applicant will not specifically market promotions designed to encourage resource workers to consume large quantities of liquor during periods away from work or between rotations.

The objective is to provide resource-sector employees with the same responsible hospitality environment available to the broader Geraldton community.

5.12.6 Applicant's Existing Experience

The Applicant's existing venues provide relevant operational experience in serving workers from resources, construction, tourism and other industries involving travel and periods away from home.

In particular, Froth's regional operations have required staff and management to serve a varied patron population comprising permanent residents, workers, contractors and visitors while applying consistent RSA and patron-management standards.

That practical experience will inform the operation of Froth Craft Brewery Geraldton, including staff training, patron welfare, refusal-of-service procedures and management of busy periods or particular events.

Geraldton has an established role as a regional resources service centre and FIFO hub, and resource-sector and working-away-from-home employees can reasonably be expected to form part of the Premises' patron population.

The Applicant recognises published evidence identifying particular wellbeing and alcohol-related considerations associated with FIFO work, while avoiding assumptions about individual workers. These considerations will be managed through the same food-focused operating model, responsible liquor promotion, RSA, patron monitoring, welfare procedures and consistent behavioural standards applying to all patrons.

The Applicant therefore considers that Froth Craft Brewery Geraldton can appropriately accommodate mining, resources and FIFO/DIDO workers without the proposed licence giving rise to an unacceptable increase in alcohol-related harm.

5.13 Tourism Benefits

Tourism is an important component of Geraldton's economy, identity and future development and represents a relevant positive public-interest consideration in the assessment of the proposed Tavern Licence.

Geraldton is an established regional tourism destination and an important gateway to Western Australia's Coral Coast and the Houtman Abrolhos Islands. Its visitor offering incorporates coastal recreation, maritime and Aboriginal heritage, natural attractions, events, food and beverage, accommodation and access to the wider Mid West, Coral Coast and destinations further north.

The proposed Premises occupies a prominent location at 1 Cathedral Avenue within Geraldton's CBD and foreshore precinct and will provide visitors with an additional food, beverage and leisure experience within an area already frequented for recreation, sightseeing, events and hospitality.

The tourism opportunity is not limited to people for whom Geraldton is their principal destination. Geraldton is also an important stopping point for people travelling north or south along Western Australia's coast. The combination of substantial food service, refreshments, indoor and outdoor dining, a dedicated children's playground and the foreshore location provides an attractive opportunity for travelling families and other road travellers to stop and spend time in Geraldton rather than simply pass through the city.

The Applicant does not contend that the grant of the Tavern Licence, by itself, will materially increase total visitation to Geraldton. Rather, the tourism benefit arises from adding a distinctive hospitality experience to Geraldton's existing visitor offering, supporting the attractiveness and amenity of the CBD and foreshore precinct, providing an additional reason for visitors and passing travellers to stop and spend time within the city, and contributing to the range of experiences available within an established regional tourism destination.

5.13.1 Tourism and the Public Interest

Tourism is expressly relevant to the public-interest assessment of the Application. The objects of the Liquor Control Act 1988 (WA) include catering for the requirements of consumers for liquor and related services with regard to the proper development of the liquor industry, tourism industry and other hospitality industries in the State, and facilitating the use and development of licensed facilities, including facilities provided for the benefit of the tourism industry.⁵⁸

The current Public Interest Assessment requirements also identify potential effects upon tourism, culture and the community, together with matters including employment, food, entertainment and leisure opportunities, as relevant considerations.

The Applicant therefore considers the tourism contribution of Froth Craft Brewery Geraldton not simply as a commercial benefit to the Applicant, but as part of the broader assessment of whether the proposed licence will contribute positively to Geraldton's visitor economy, hospitality infrastructure and development as a regional destination.

5.13.2 Geraldton as an Established Tourism Destination

Geraldton is an established tourism destination and major regional centre within Australia's Coral Coast.

The Western Australian Government's Seven Cities Vision identifies Geraldton as a gateway to Australia's Coral Coast and the Houtman Abrolhos Islands and identifies expansion of the local tourism industry among the opportunities contributing to Geraldton's future growth.⁵⁹

Geraldton provides access to a diverse range of visitor experiences including the Geraldton Foreshore and coastline, the Houtman Abrolhos Islands, Museum of Geraldton, HMAS Sydney II Memorial,

Batavia and broader maritime heritage, Aboriginal cultural experiences, wildflowers, beaches and water-based recreation, events, hospitality and the wider Coral Coast touring route.

The Houtman Abrolhos Islands represent a particularly significant tourism asset accessible from Geraldton. They incorporate exceptional natural and maritime heritage, including the nationally heritage-listed Batavia Shipwreck Site and Survivor Camps Area 1629.⁶⁰ The islands add a nationally significant heritage and nature-based tourism dimension to Geraldton's role as a mainland visitor gateway.

Geraldton's standing as a visitor destination has also received repeated industry recognition. In 2026 Geraldton received Silver in the 7NEWS Top Tourism Town Awards for the fifth consecutive year.⁶¹ The City attributed this recognition to the continuing efforts of tourism operators, businesses and the community to strengthen Geraldton's visitor offering.

The proposed Premises will therefore operate within a regional city in which tourism is already an established industry and where strengthening and diversifying the visitor economy forms part of current State and local objectives.

5.13.3 Alignment with the City's Tourism Objectives

The proposed venue is consistent with the City of Greater Geraldton's continuing efforts to strengthen Geraldton as a visitor destination and encourage visitors to spend more time within the city.

In 2025, the City launched its "Stay and Play" tourism campaign specifically to encourage visitors to stay longer in Geraldton and explore the city's hospitality and visitor offering.⁶² The City described Geraldton as a hub for families and couples visiting the Mid West and promoted its foreshore, coastline, food scene, culture and other visitor experiences.

The City has also actively incorporated CBD cafés, restaurants and bars into its tourism marketing, including its Visit Geraldton Food and Beverage Trail and destination photography⁶³, demonstrating that local hospitality businesses are considered part of the visitor experience and broader strategy for encouraging people to spend time within Geraldton.

In announcing Geraldton's fifth consecutive Top Tourism Town Silver Award in 2026, the City again referred to its collaboration with local tourism operators and CBD food and beverage businesses through the Stay and Play campaign to position Geraldton as a holiday destination.

Froth Craft Brewery Geraldton will constitute a substantial new food and beverage business within this CBD and foreshore environment. Its proposed operation is therefore complementary to an existing tourism strategy in which hospitality, visitor experiences and increased visitor dwell time are actively encouraged.

5.13.4 Location within the CBD and Foreshore Visitor Precinct

The location of the proposed Premises is particularly relevant to its potential tourism contribution.

The Premises at 1 Cathedral Avenue is positioned at the interface of Geraldton's CBD and foreshore environment. Visitors to this part of Geraldton are already able to access recreational areas, beaches, cultural and heritage attractions, accommodation, retail, events and hospitality within the surrounding precinct.

The Geraldton Foreshore is itself one of the city's principal visitor and community assets and features prominently in the City's tourism promotion. The City's Stay and Play campaign specifically identifies Geraldton's "world-class Foreshore", coastline and food scene as elements of its destination appeal.

The City's broader strategic planning has also recognised the relationship between the city centre, foreshore, tourism, entertainment and food and beverage activity. This is relevant to the proposed use because Froth will add a substantial hospitality venue at the point where these activities intersect.

The proposed combination of substantial food service, indoor and outdoor dining, locally produced craft beer, family facilities, entertainment and a prominent foreshore setting will provide an additional hospitality experience within this established visitor environment.

5.13.5 Proximity to Visitor Information and Tourism Promotion

A further advantage of the proposed location is its proximity to Geraldton's visitor-information services and the concentration of tourism activity within the CBD and foreshore precinct. The Applicant intends to establish and maintain close working relationships with Geraldton's tourism and visitor-information organisations and to actively participate in the promotion of Geraldton as a destination, rather than operating the Premises in isolation from the wider visitor economy.

This will include making information about Froth Craft Brewery Geraldton available through appropriate visitor-information channels and seeking opportunities for the Premises to be included in local tourism, food and beverage, events and destination-promotion initiatives.

The Applicant also intends to make appropriate Geraldton and Mid West tourism information available at the Premises. This may include printed visitor guides, maps, event information, tourism brochures and promotional material supplied by local tourism organisations and operators, together with digital promotion of local attractions, events and visitor experiences through the Premises' digital screens, website, social media and other customer communication channels.

This relationship is intended to operate in both directions. Visitors obtaining information through Geraldton's tourism network may be made aware of Froth as a local food, beverage and family-friendly hospitality experience, while visitors to Froth will in turn be encouraged to discover other Geraldton and Mid West attractions, events, tourism operators and experiences.

This is particularly relevant given the location and anticipated patronage of the Premises. Patrons stopping at Froth while travelling north or south, cruise passengers visiting the CBD, and other tourists may not be familiar with the range of experiences available in Geraldton. The Premises therefore has the capacity to function not only as a hospitality destination, but also as an additional point through which visitors can be exposed to information about the wider destination.

The Applicant considers this collaborative approach preferable to viewing individual tourism and hospitality businesses in isolation. A strong visitor economy depends upon accommodation providers, attractions, hospitality venues, event operators, tourism businesses and visitor-information services collectively encouraging visitors to explore the destination and spend more time within it.

The Applicant's ability to develop these relationships is also supported by director Tyson Overstone's existing involvement and experience within Geraldton's tourism and events sector, including his previous role as a Director of Tourism Geraldton Mid West. This provides the Applicant with an established understanding of the local tourism industry and opportunities for collaboration between the Premises and the wider visitor economy.

5.13.6 Cruise Geraldton and the CBD

Cruise tourism provides a particularly tangible example of the relationship between Geraldton's visitor economy and the location of the proposed Premises.

Geraldton receives cruise vessels whose passengers are brought ashore and directed into the CBD and foreshore environment during their time in the city. Organised welcome arrangements have been developed to introduce visiting passengers to Geraldton's attractions, businesses, food, entertainment and local experiences.

For larger cruise vessels, the City's visitor information describes a dedicated Welcome Hub incorporating a small market, shade structures and seating, together with Meet and Greet volunteers and visitor-information services for cruise passengers.⁶⁴ The scale of this activity can be significant. Mid West Ports Authority reported that 11 cruise ships visited Geraldton during 2022/23, bringing more than 11,000 passengers and crew.⁶⁵ In collaboration with the City of Greater Geraldton and a local event activation company, passengers were greeted within the Geraldton CBD (directly across from the Premises) at a Welcome Area incorporating entertainment, food and drink and opportunities to purchase products from local businesses.

Cruise tourism has continued to form part of Geraldton's visitor economy, with welcome activities providing a mechanism through which large numbers of short-stay visitors are introduced directly to the city centre and surrounding attractions. This activity is relevant to the proposed Premises because Froth Craft Brewery Geraldton will operate within the same broader CBD and foreshore visitor environment into which cruise passengers are deliberately welcomed.

Cruise passengers generally have a limited period ashore in which to experience a destination. Accessible food, beverage, leisure and locally distinctive hospitality experiences within the CBD therefore form part of the overall shoreside visitor offering. Froth Craft Brewery Geraldton will provide an additional option for those visitors through its combination of substantial food service, Western Australian craft beer, indoor and outdoor dining and foreshore location.

The Applicant does not suggest that cruise passengers will necessarily patronise the Premises or seek to quantify future cruise-related expenditure. Rather, the established cruise program demonstrates an identifiable tourism market that is brought directly into the broader precinct in which the Premises will operate.

5.13.7 Community Survey Evidence Supporting a Tourism Role

The Applicant's community survey provides direct evidence that respondents see a role for Froth Craft Brewery Geraldton extending beyond the operation of the Premises itself and into the promotion of Geraldton and the wider Mid West as a visitor destination.

Respondents were asked:

"What services/facilities/initiatives would you like at Froth Craft Brewery Geraldton?"

What services/facilities/initiatives would you like at Froth Craft Brewery Geraldton?

Number of responses: 1096

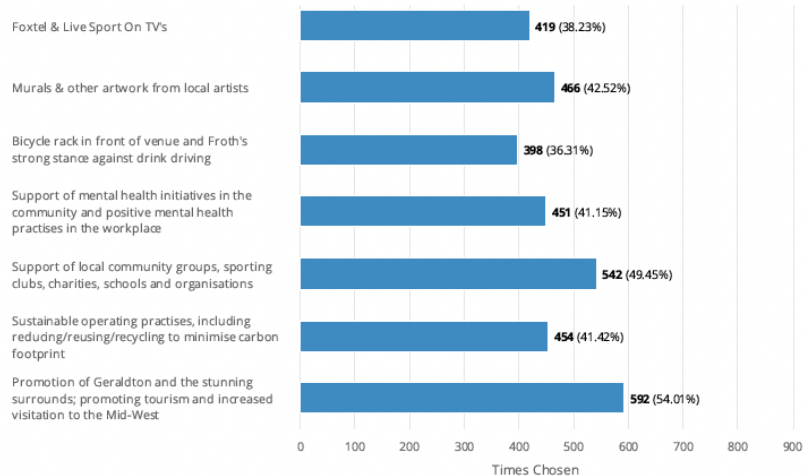
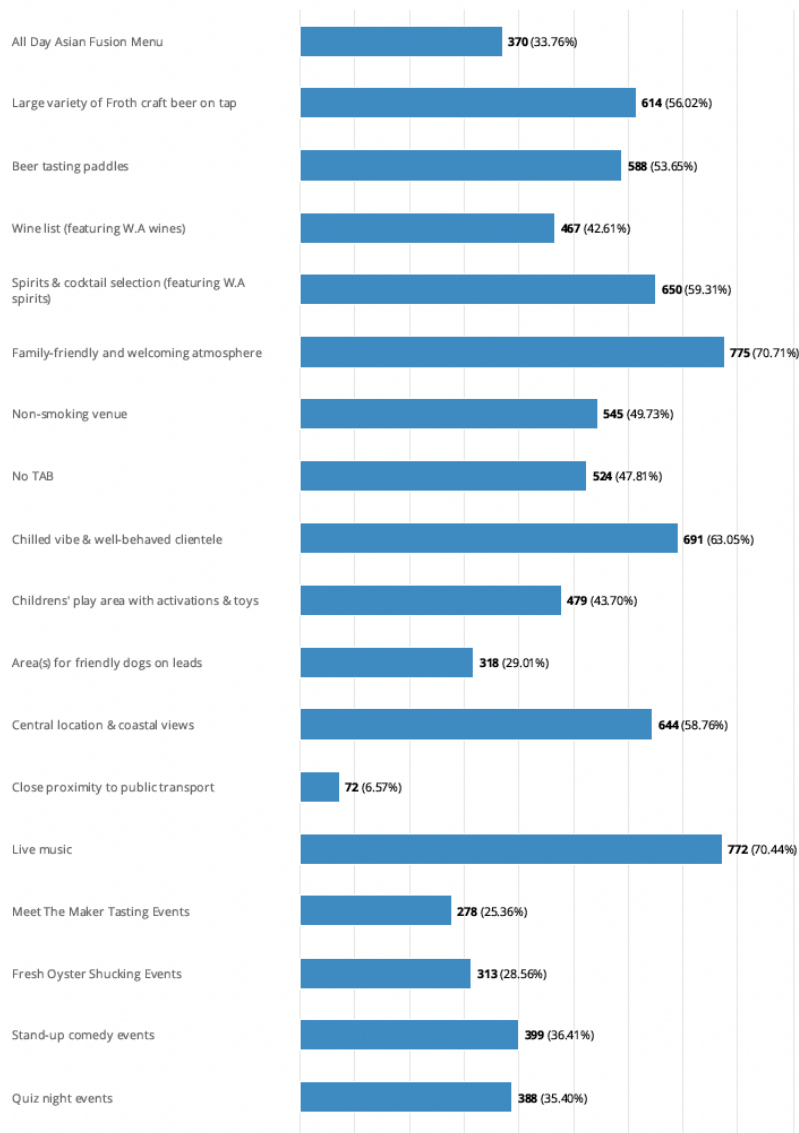


Chart 6. "What services/facilities/initiatives would you like at Froth Craft Brewery Geraldton?" question and answers in the Applicant's survey

Of the 1,096 respondents answering this question, 592 respondents (54.01%) selected:

“Promotion of Geraldton and the stunning surrounds; promoting tourism and increased visitation to the Mid-West.”

Respondents were able to select multiple options. Nevertheless, the result demonstrates that more than half of respondents to this question specifically identified promotion of Geraldton, its surrounds and regional tourism as an initiative they would like to see incorporated into the Froth Geraldton offering.

This is directly relevant to the Applicant’s proposed approach. As described above, Froth intends to develop close working relationships with Geraldton’s visitor-information and tourism organisations and to use both the Premises and Froth’s broader marketing channels to promote Geraldton and Mid West attractions, events, tourism operators and visitor experiences.

This may include displaying printed tourism information, visitor guides, maps and event material at the Premises; displaying appropriate tourism and destination content through digital screens within the venue; promoting local attractions and events through Froth’s website, social media and other digital channels; and participating in collaborative destination-marketing initiatives with tourism organisations and other local businesses.

The survey therefore provides direct community support for an aspect of the Applicant’s tourism strategy that extends beyond attracting visitors to Froth itself. The intention is that the Premises can also provide a platform through which visitors are encouraged to discover other attractions, businesses, events and experiences throughout Geraldton and the Mid West.

Other survey results reinforce the suitability of the proposed Premises for this broader visitor role. Of the 1,120 respondents answering who they anticipated visiting Froth with (*see Chart 5.*), 752 (67.14%) selected family and 512 (45.71%) selected children. Of the 1,125 respondents answering the preferred visiting-time question, 786 (69.87%) selected 2.00pm–6.00pm and 556 (49.42%) selected 11.00am–2.00pm. These results are consistent with anticipated use extending across family, daytime and afternoon hospitality rather than being concentrated solely upon late-night alcohol consumption.

The survey also indicates that this tourism initiative is strongly supported from within the Geraldton community itself. Of the 1,024 respondents for whom postcode information was available, 919 (89.7%) provided a Geraldton postcode of 6530, 6531 or 6532.

The Applicant considers this combination particularly relevant: the survey demonstrates substantial local interest in the proposed venue while, at the same time, more than half of respondents specifically indicated that they would like Froth to contribute to the promotion of Geraldton and the Mid West as a tourism destination.

5.13.8 Supporting Visitor Dwell Time and the Geraldton Experience

An important element of regional tourism is not simply attracting visitors to a destination, but providing sufficient experiences, services and amenities to encourage them to stay, explore and spend time within that destination. This is expressly reflected in the City’s Stay and Play strategy, which seeks to encourage visitors to stay longer in Geraldton and experience its hospitality, coastline, culture and other attractions.

The proposed Premises can contribute to this objective by adding another substantial hospitality and leisure experience to the city. Visitors may use the venue for lunch or dinner, to experience locally produced craft beer, for family dining, to spend an afternoon within the foreshore precinct, to attend entertainment or an event, or as one component of a broader visit to the Geraldton CBD.

The relevant public-interest benefit is that the proposed venue will increase the range and diversity of experiences and services available to visitors and contribute to the overall quality and depth of Geraldton's tourism offering.

5.13.9 Geraldton as a Stopover for Regional Road Travellers

The potential tourism contribution of the Premises is not limited to visitors for whom Geraldton is their final destination. Geraldton occupies an important position on the coastal road route between Perth and destinations further north in Western Australia. As a major regional centre, Geraldton provides a natural stopping point for people travelling north or south for holidays, recreation, work or to visit destinations throughout the Mid West, Gascoyne and Coral Coast.

For these travellers, the availability of attractive and easily accessible places to stop for a meal, refreshments and a break from driving can contribute to the decision to stop and spend time in Geraldton rather than simply pass through the city.

Froth Craft Brewery Geraldton is particularly well suited to this form of visitor use. The Premises will provide substantial food service, indoor and outdoor dining, alcoholic and non-alcoholic beverages, amenities and a dedicated children's playground within the CBD and foreshore precinct.

The children's playground is particularly relevant to travelling families. For parents undertaking longer road journeys with children, the opportunity to stop for lunch or another meal while children are able to take a break from travelling and use a dedicated play area provides a practical visitor amenity extending well beyond the provision of liquor.

The Applicant has observed this form of patronage at its existing Froth Craft Brewery Bunbury venue. Bunbury similarly functions as both a destination and a stopping point for people undertaking longer journeys through the South West. Through its operation of that venue, the Applicant regularly observes travelling patrons and families stopping at Froth Bunbury for lunch, refreshments and a break during longer road trips.

That existing operational experience informs the Applicant's expectation that Froth Craft Brewery Geraldton may perform a similar function for travellers moving north and south through Geraldton.

The Applicant does not suggest that the Premises will itself cause people to undertake journeys through Geraldton or seek to quantify the number of passing travellers who may patronise the venue. Rather, the benefit is the creation of an additional family-friendly hospitality experience capable of encouraging people already travelling through the region to stop in Geraldton, spend time within the CBD and foreshore and make use of local businesses and visitor amenities.

A stop initially made for lunch, refreshments or use of the children's facilities may also expose travellers to the Geraldton Foreshore and surrounding CBD and increase their awareness of Geraldton's broader attractions and visitor offering. In this way, the Premises has the capacity to contribute not only to the experience of tourists staying in Geraldton, but also to the City's broader objective of encouraging people travelling through the region to stop, engage with and spend time in Geraldton.

5.13.10 A Distinctive Regional Western Australian Hospitality Experience

The proposed Premises will offer a hospitality experience distinguishable from a conventional hotel, restaurant or bar. Froth Craft Brewery Geraldton will showcase beer produced by an independent Western Australian craft brewery alongside substantial food service, dining, entertainment and family-oriented hospitality.

The Froth brand originated in regional Western Australia, with Froth established in Exmouth in 2016. The group subsequently established Froth venues in Bunbury and North Beach, with Geraldton proposed as its fourth Western Australian location.

For visitors, the attraction is therefore not simply the availability of liquor. The experience combines Western Australian craft beer, food, venue design, outdoor hospitality, entertainment, family facilities and the character of the surrounding destination.

The Applicant does not contend that Geraldton lacks licensed premises or that tourists require another premises merely from which to purchase alcohol. The tourism benefit instead arises from adding a differentiated food, beverage and leisure experience to the range already available within the city.

5.13.11 Froth's Existing Regional Tourism Experience

The Applicant's capacity to contribute positively to a regional tourism destination is supported by the Froth group's existing experience.

Froth Craft Brewery Exmouth was awarded WA's Best Tourism Initiative at the 2018 Australian Hotels Association (WA) Hospitality Awards for Excellence.⁶⁶ The award was sponsored by Tourism Western Australia. This provides independent industry recognition of Froth's demonstrated contribution to the hospitality and tourism offering of another regional Western Australian destination.

Through the operation and promotion of its existing venues, particularly Froth Craft Brewery Exmouth, the Froth group has also developed practical experience engaging with Western Australia's tourism industry and working with tourism organisations, including Tourism Western Australia and Tourism Council Western Australia. This experience has provided the group with an understanding of destination marketing, tourism industry networks, visitor expectations and the role that distinctive food and beverage experiences can play within the broader tourism offering of a regional destination.

The Applicant does not suggest that the tourism outcomes associated with Exmouth will necessarily be replicated in Geraldton. Exmouth and Geraldton are different destinations with different visitor markets and characteristics. However, the Exmouth tourism award, together with Froth's experience working within Western Australia's tourism industry, demonstrates that the group has practical experience developing, operating and promoting hospitality venues as part of a broader regional visitor economy.

That experience is directly relevant to Geraldton. The Applicant intends to bring its existing tourism-industry knowledge and relationships to the proposed Premises and to engage constructively with Tourism Western Australia, Tourism Council Western Australia, Tourism Geraldton Mid West, the City of Greater Geraldton and local tourism operators in promoting Geraldton and the Mid West as a destination.

This may include participation in destination-marketing initiatives, tourism campaigns, familiarisations, industry events, visitor-information programs and other collaborative promotional opportunities, where appropriate. The Applicant also intends to use Froth's own marketing channels and the Premises itself to promote Geraldton and Mid West attractions, events and tourism experiences to visitors.

The Applicant therefore brings not only experience operating successful regional hospitality venues, but an existing understanding of how to work collaboratively with tourism bodies and other operators to contribute to the wider visitor economy.

5.13.12 Applicant Director's Tourism and Events Experience

The Applicant's capacity to participate meaningfully in Geraldton's tourism and events sector is further supported by the experience of Applicant director Mr Tyson Overstone. Mr Overstone is a director of Froth Craft Brewery Geraldton and not a director of Froth Craft Brewery Exmouth, Bunbury or North Beach.

Mr Overstone is the founder of Geraldton-based events business Sweet Orange Productions and has substantial experience in event production, hospitality and tourism. His experience includes the development and delivery of events within Geraldton and elsewhere in Western Australia, including tourism, music, food, community and regional events. Mr Overstone has also served as a Director of Tourism Geraldton Mid West.⁶⁷ His involvement in Geraldton's tourism industry has provided practical experience of the local visitor economy and established working relationships across the tourism, hospitality, events and business sectors.

Tourism Geraldton Mid West records Mr Overstone's experience operating and managing bars and restaurants and working as a tour operator and guide, together with his extensive events experience.⁶⁸ Through Sweet Orange Productions, Mr Overstone and his team have been involved with events including Laneway, Blues & Roots, Fremantle Seafood Festival, Gourmet Escape, Southbound and the Ningaloo Whale Shark Festival, as well as Geraldton and Mid West events including Funtavia, WOW Fest, the Geraldton Boating Camping Fishing Show, Rivergum Roots n Reggae and Beats on the Green.

This experience is directly relevant to the proposed Premises. It provides the Applicant with practical local knowledge of event development and delivery, visitor experiences, hospitality operations and collaboration with tourism operators, event organisers, businesses and community stakeholders.

These existing networks and experience provide opportunities for Froth Craft Brewery Geraldton to participate in and complement Geraldton's tourism and events calendar, collaborate with other operators and develop appropriate events and visitor experiences at the Premises. The Applicant does not rely upon Mr Overstone's contacts or experience as evidence that particular future events, visitor numbers or economic outcomes are guaranteed. Rather, they demonstrate that the Applicant includes a director with substantial and directly relevant local tourism and event experience and an established capacity to identify and develop opportunities that may support Geraldton's visitor economy.

5.13.13 Events, Entertainment and Destination Activation

Geraldton's events calendar forms an important part of its visitor offering and provides another opportunity for the proposed Premises to contribute to the visitor economy.

Events such as Shore Leave demonstrate the relationship between food, hospitality, entertainment, the foreshore and regional tourism. Shore Leave celebrates the food, adventure and experiences distinctive to Geraldton and the Mid West and includes activities within the Geraldton foreshore and surrounding visitor precinct.

If Froth Craft Brewery Geraldton is to be granted a tavern license, and trade under the conditions of said license, which of the following new services/experiences would you be supportive of?

Number of responses: 1029

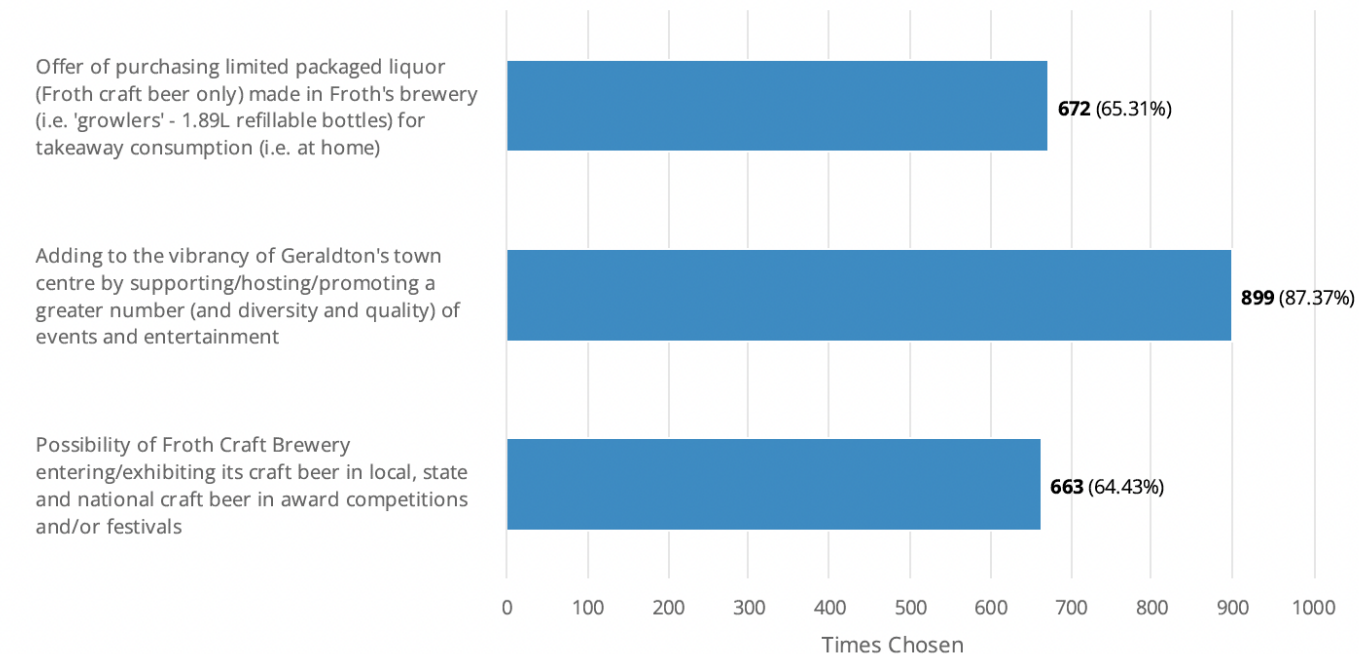


Chart 7. “If Froth Craft Brewery Geraldton is to be granted a tavern license, and trade under the conditions of said license, which of the following new services/experiences would you be supportive of?” question and answers in the Applicant’s survey

899 of 1,029 respondents (87.37%) in the survey (see chart above) supported Froth “adding to the vibrancy of Geraldton's town centre by supporting/hosting/promoting a greater number (and diversity and quality) of events and entertainment.”

This strong level of support is directly relevant to the tourism benefits of the proposed Premises. A greater diversity of events and entertainment within the Geraldton CBD and foreshore precinct has the capacity to enhance the visitor experience, complement Geraldton’s existing tourism and events calendar, encourage visitors to spend more time within the city centre, and provide additional reasons for both residents and visitors to engage with the precinct.

Froth’s operating model at its existing venues similarly incorporates live music, entertainment, community events and collaborations alongside its core food and beverage operation. Subject to the conditions of the Tavern Licence, applicable approvals and appropriate management of surrounding amenity, the Geraldton Premises will have the capacity to provide similar entertainment and events and to participate in broader Geraldton tourism, cultural and community activities.

The combination of the venue's location and the Applicant's existing local events expertise creates an opportunity for the Premises to complement Geraldton's existing event calendar and provide additional hospitality infrastructure for visitors attending events elsewhere within the CBD and foreshore.

The Applicant does not attribute particular visitor numbers to events that have not yet been programmed. The relevant benefit is the additional venue capacity, experience and operational capability that the Premises will introduce into the CBD.

5.13.14 Broad Visitor and Family Appeal

The tourism contribution of the Premises is also supported by its intended appeal to a broad visitor market rather than a narrowly alcohol-focused clientele. The proposed venue has been designed to accommodate families, couples, groups of friends, independent travellers, business visitors and other visitors to Geraldton.

Substantial food service, indoor and outdoor dining, the dedicated children's playground, low- and non-alcoholic beverages and the foreshore location will allow the Premises to be used for purposes extending well beyond the consumption of liquor. The family-oriented characteristics of the Premises are particularly relevant to both destination visitors and families undertaking longer road journeys through Geraldton. They provide a place where adults and children can stop, eat and spend time together, with the playground providing an additional amenity for children during a meal or break from travelling. This is consistent with the City's positioning of Geraldton as a destination for families and couples and its promotion of the city's coastline, food, culture and recreational experiences.

The proposed Tavern Licence enables liquor to form part of that hospitality experience, but the tourism contribution of the Premises derives from the overall food, beverage, leisure, entertainment and social offering rather than alcohol consumption alone.

5.13.15 Local Economic and Employment Benefits Associated with Tourism

The operation of the Premises will also allow visitor expenditure to contribute to local employment and the broader Geraldton economy. Froth Craft Brewery Geraldton will employ local people across hospitality, kitchen, management, cleaning, maintenance and associated functions and will procure goods and services required for its operation. The Premises will operate as part of a broader visitor economy incorporating accommodation providers, tourism operators, attractions, transport, retail, hospitality and events.

The City's current tourism activity expressly recognises the connection between tourism and CBD food and beverage businesses, including through the incorporation of hospitality businesses into its destination marketing initiatives.

The Applicant does not seek to assign a speculative dollar value to future tourism expenditure attributable specifically to Froth Craft Brewery Geraldton. Rather, the economic benefit arises from the Premises becoming another local business capable of servicing visitors, employing local people and participating in the network of businesses that collectively deliver Geraldton's visitor experience.

5.13.16 Tourism Benefits and Harm Minimisation

The Applicant recognises that positive tourism outcomes do not override the harm-minimisation objectives of the Liquor Control Act. Visitors may be less familiar than local residents with transport

options, accommodation locations and the surrounding locality. Cruise visits, festivals, major events and peak tourism periods may also produce periods of increased patron demand.

The Applicant will apply the same responsible service of alcohol, intoxication monitoring, food availability, patron welfare, security, incident-management and safe-departure measures described elsewhere in this Assessment to visitors as it does to local patrons. Staff will provide reasonable assistance to patrons requiring information concerning transport or safe departure, and staffing and security arrangements will be capable of being adjusted having regard to anticipated patron numbers, events and periods of increased visitation.

The tourism contribution of the proposed Premises is therefore intended to operate consistently with, rather than at the expense of, the harm-minimisation objectives of the Act.

The Applicant considers that the proposed Tavern Licence will make a positive contribution to Geraldton's tourism and visitor economy.

Geraldton is an established and repeatedly recognised tourism destination. The State Government identifies Geraldton as a gateway to Australia's Coral Coast and the Houtman Abrolhos Islands, while the City of Greater Geraldton is actively seeking to encourage visitors to stay longer, experience the city's food and beverage offering and spend time within its CBD and foreshore. Geraldton also has established cruise, events and regional touring markets that bring visitors into and through the city. The proposed Premises is particularly well positioned to form part of the hospitality infrastructure servicing those visitors.

Importantly, the tourism opportunity extends beyond visitors staying overnight in Geraldton. Froth Craft Brewery Geraldton will provide an additional reason for people travelling north or south through the region to stop within the city for food and refreshments. This is particularly relevant to travelling families, who will be able to combine a meal and break from driving with use of the venue's dedicated children's playground.

The Applicant's experience at Froth Craft Brewery Bunbury provides a practical example of this form of visitor use, with the Applicant regularly observing families and other travellers stopping at that venue for lunch and refreshments while undertaking longer road journeys. Froth Craft Brewery Geraldton will add a distinctive regional Western Australian craft brewery, food and leisure experience with broad appeal to families, couples, groups, business travellers and other visitors. The Froth group also brings demonstrated regional tourism experience, including Froth Craft Brewery Exmouth being awarded WA's Best Tourism Initiative at the 2018 AHA(WA) Hospitality Awards for Excellence.

The Applicant further brings substantial Geraldton-specific tourism and events capability through director Tyson Overstone, whose experience through Sweet Orange Productions and Tourism Geraldton Mid West provides practical local knowledge, industry relationships and experience in developing and delivering events and visitor experiences.

Importantly, the Applicant does not rely upon speculative estimates of additional visitor numbers, overnight stays or expenditure. The public-interest benefit is more directly demonstrated by the addition of substantial hospitality infrastructure, increased diversity of visitor experiences, support for visitor dwell time, activation of the CBD and foreshore, local employment, an additional reason for regional road travellers to stop in Geraldton, the capacity to complement Geraldton's established tourism and events calendar, and an Applicant with demonstrated regional tourism and local event experience.

For these reasons, the Applicant considers that the tourism contribution associated with Froth Craft Brewery Geraldton is a significant positive public-interest consideration in favour of the grant of the proposed Tavern Licence.

6. Locality Assessment

In accordance with the locality requirements of Racing, Gaming and Liquor's current Public Interest Assessment guidance, the Applicant has undertaken detailed inquiries into the locality surrounding the proposed Premises.⁶⁹ As Geraldton is located outside the 15 km radius of the Perth CBD and is not considered a remote location for the purposes of the guidance, a 3 km radius from the Premises has been adopted as the locality for this Assessment. The Applicant has undertaken this locality due diligence to identify and assess the characteristics of the surrounding community, relevant existing licensed premises and other facilities, persons and groups who may potentially be affected by the Application, and any reasonably foreseeable alcohol-related, amenity or community impacts requiring consideration or mitigation.

This is consistent with the locality adopted elsewhere in this Assessment and provides an appropriate basis upon which to consider the existing licensed environment, the character and amenity of the surrounding area, the availability of comparable hospitality facilities and the potential interaction between the proposed Tavern Licence and the existing community.

The locality assessment is not relied upon merely to demonstrate that other licensed premises already operate in Geraldton. The existence of other licences does not, of itself, establish that the present Application is in the public interest.

Rather, the assessment has been undertaken to identify the existing licensed environment and to consider:

- the number, type and distribution of relevant licensed premises within the locality;
- the nature of the hospitality and liquor services presently available;
- the extent to which the proposed Froth Craft Brewery Geraldton operation is similar to, or distinguishable from, existing premises;
- the potential cumulative implications of introducing an additional licensed premises;
- the relationship between the proposed Premises and Geraldton's established CBD, foreshore, hospitality and visitor precinct;
- the potential for impacts upon the amenity, quiet and good order of the locality and upon people living or working nearby; and
- the particular public-interest benefits and risks associated with the proposed manner of trade.

This approach is consistent with the Applicant's broader methodology throughout this Assessment: identifying the existing circumstances of the locality, considering reasonably foreseeable risks associated with the proposed licence and identifying practical measures by which those risks will be managed.

6.1 Existing Licensed Premises within the 3 km Locality

The Applicant has reviewed licensed hospitality and packaged-liquor premises operating within approximately 3 km of the proposed Premises.⁷⁰

Geraldton contains a range of hotels, taverns, bars, restaurants and packaged-liquor outlets, with a notable concentration of hospitality premises within the CBD, Marine Terrace and foreshore areas.⁷¹

This existing concentration is relevant because it demonstrates that the proposed Premises will operate within an established hospitality environment rather than introducing licensed hospitality activity into an otherwise predominantly residential or alcohol-free locality.

However, the Applicant does not rely upon the existence or previous approval of those premises as establishing that the proposed Tavern Licence should itself be granted. Each application must be assessed according to its own circumstances and the Applicant accepts that the public-interest implications of the present Application must be independently considered.

The locality review instead provides context for assessing the nature of the proposed operation, the existing availability of liquor and hospitality services and the proposed Premises' likely interaction with the existing licensed environment.

Table 7: Relevant Licensed Premises within Approximately 3 km of 1 Cathedral Avenue, Geraldton WA 6530

#	Premises	Address	Licence Type / Category	Relevance to Locality Assessment
1	Ocean Centre Hotel / Sirocco Bar & Café	Corner Foreshore Drive & Cathedral Avenue, Geraldton	Hotel	Immediately adjacent to proposed Premises; established hotel, restaurant and bar operation within foreshore/CBD precinct
2	The Gerald / Bob's Boutique Bar	25 Cathedral Avenue, Geraldton	Small Bar / hotel-associated hospitality	Nearby CBD accommodation and licensed hospitality offering
3	Old Man & the Sea Rooftop Bar	Level 3, 25 Cathedral Avenue, Geraldton	Small Bar / hotel-associated hospitality	Rooftop bar within The Gerald and part of existing CBD evening hospitality offering
4	Geraldton Hotel	19 Gregory Street, Geraldton	Hotel	Established hotel and licensed hospitality premises within CBD locality
5	Harbour View Restaurant & Bar	Top Floor, 87 Marine Terrace, Geraldton	Restaurant / licensed hospitality	Food and beverage venue within CBD and Marine Terrace hospitality precinct
6	BWS Geraldton	54 Sanford Street, Geraldton	Liquor Store	Existing general packaged-liquor retailer; relevant to assessment of proposed restricted Froth takeaway offering
7	Cellarbrations Central	41 Chapman Road, Geraldton	Liquor Store	Existing general packaged-liquor retailer within locality
8	Cellarbrations Queens	79 Durlacher Street, Geraldton	Liquor Store	Existing general packaged-liquor retailer within locality
9	The Provincial	167 Marine Terrace, Geraldton	Licensed restaurant / hospitality venue	Established food and beverage venue within Marine Terrace hospitality precinct
10	Topolinis Caffè	158 Marine Terrace, Geraldton	Restaurant	Licensed restaurant offering within CBD
11	RT Restaurant and Café	84 Marine Terrace, Geraldton	Restaurant	Licensed restaurant and dining venue within CBD

12	Emerald Room Restaurant / Hospitality Geraldton	169 Cathedral Avenue, Geraldton	Restaurant	Licensed dining/hospitality venue within broader Cathedral Avenue locality
13	Batavia Brewing	60 Fitzgerald Street, Geraldton	Tavern	Existing Geraldton craft brewery and tavern and therefore a particularly relevant comparator

The proposed Premises occupies the site of the former Skeetas Restaurant at the corner of Cathedral Avenue and Foreshore Drive (**see section 3.2 History of the Site**). The site has an established history of restaurant and hospitality use. Skeetas subsequently relocated to the Geraldton Marina and continues to operate there. The former operation of Skeetas is relevant to the historical use and character of the location, including its established relationship with hospitality activity. However, the Applicant does not count the former Skeetas operation as a current licensed premises when assessing the existing licensed environment.

The proposed Froth Craft Brewery Geraldton will therefore reactivate and substantially redevelop a site with an established history of hospitality use, rather than introducing hospitality activity to a location with no previous association with that use.

6.2 Nature of the Existing Licensed Environment

The Applicant recognises that the existence of a number of licensed premises within the locality requires consideration of cumulative alcohol-related harm rather than simply being characterised as evidence of demand for another licence.

The proposed Tavern Licence will increase the number of licensed premises operating within the locality. The Applicant has therefore considered whether its proposed manner of trade could contribute to excessive alcohol consumption, intoxication, antisocial behaviour, disturbance, displacement or movement of patrons between licensed premises or other cumulative impacts.

A number of characteristics of the proposed operation are relevant to that assessment.

Froth Craft Brewery Geraldton is proposed as an integrated craft brewery, food, dining, social, family and entertainment venue. The Premises will provide:

- substantial food service throughout trading;
- indoor and outdoor seated hospitality areas;
- at least 20 Froth craft beers together with wine, spirits and non-alcoholic beverages;
- low- and non-alcoholic alternatives;
- a dedicated children's playground;
- accommodation for families and mixed patron groups;
- live entertainment, events and community activities where appropriate; and
- a hospitality model intended to operate across daytime, afternoon and evening periods rather than being principally dependent upon late-night liquor consumption.

The Applicant's community survey provides evidence consistent with this anticipated manner of use. Of the 1,120 respondents answering the relevant question, 67.14% indicated that they anticipated visiting Froth with family and 45.71% indicated that they anticipated visiting with children. Of the 1,125 respondents answering the preferred visiting-time question, 69.87% selected 2.00pm–6.00pm and 49.42% selected 11.00am–2.00pm.

The Applicant does not suggest that these characteristics eliminate alcohol-related risk. Rather, they are relevant to the manner in which the Premises is expected to operate and the range of harm-minimisation measures required.

6.3 Comparison with Existing Licensed Hospitality Premises

The Applicant has considered whether the proposed Premises merely duplicates the hospitality offering already available within the locality.

Geraldton already has a diverse hospitality sector. The Applicant does not contend that Geraldton lacks licensed restaurants, hotels, bars, family-friendly hospitality or craft beer.

Batavia Brewing is particularly relevant because it demonstrates that craft brewing already forms part of Geraldton's licensed hospitality environment. Accordingly, the Applicant does not rely upon any proposition that Froth will be Geraldton's only craft brewery or brewery-style venue.

Rather, the proposed Premises will add a further distinctive hospitality offering through the particular combination of the established Froth Craft Brewery brand, a broad range of Froth-produced craft beer, substantial food service, indoor and outdoor dining, a dedicated children's playground, events and entertainment, community engagement and a prominent CBD/foreshore location.

Table 8: Comparison of Proposed Froth Venue with Selected Existing Hospitality Premises

Criterion	Froth Craft Brewery Geraldton	Batavia Brewing	Ocean Centre Hotel / Sirocco	Bob's Boutique Bar	Old Man & the Sea Rooftop Bar	The Provincial
General venue type	C r a f t brewery / tavern / dining venue	C r a f t brewery / tavern	Hotel / restaurant / bar	Boutique bar / tapas	Rooftop bar / dining	Restaurant / bar
Food offering	Substantial menu throughout trading	F o o d available	Restaurant / dining	Tapas / small plates	Meals / dining	Restaurant / dining
Craft brewery identity	Yes – Froth Craft Brewery	Yes	No	No	No	No
Own-produced beer	Yes – Froth products	Yes	No evidence identified	No evidence identified	No evidence identified	No evidence identified
Indoor dining	Yes	Yes	Yes	Yes	Yes	Yes

O u t d o o r hospitality	Yes – dedicated beer garden	Available	V e n u e dependent	Primarily indoor	Yes – rooftop	V e n u e dependent
D e d i c a t e d c h i l d r e n ' s playground	Yes	No dedicated playground identified	No dedicated playground identified	N o dedicated playground identified	No dedicated playground identified	No dedicated playground identified
E v e n t s / entertainment	Proposed as part of operating model	E v e n t s / functions	Hospitality/ events	Live music/ events	Live music/ events/functions	Hospitality

The comparison is not intended to suggest that the proposed Premises is superior to existing Geraldton businesses. Nor does differentiation alone establish that a Tavern Licence should be granted.

Rather, it demonstrates that the proposed Premises will add another form of hospitality choice to the existing locality through a particular combination of brewery, dining, family, recreation, entertainment and tourism-oriented characteristics.

6.4 Takeaway Liquor and Existing Packaged-Liquor Availability

The Applicant has separately considered the availability of packaged liquor within the locality because the proposed Tavern Licence is intended to permit limited takeaway sales. As addressed elsewhere in this Assessment, the Applicant does not propose to operate the Premises as a bottle shop or general packaged-liquor outlet.

Any takeaway liquor sales are intended to be limited to products manufactured by the Applicant or its associated Froth Craft Brewery entity, Froth Craft Brewery Bunbury, with takeaway craft beer expected to be sold predominantly through growler fills. The Applicant does not propose to sell takeaway packaged liquor manufactured by unrelated third-party producers.

The proposed takeaway component is therefore ancillary to the broader craft brewery and hospitality experience and materially different from the operation of a conventional liquor store carrying a broad range of beer, wine, spirits and other packaged liquor.

The Applicant would accept an appropriate condition restricting takeaway liquor sales to liquor produced by the Applicant or its associated Froth Craft Brewery entity.

The locality already contains general packaged-liquor retailers, including BWS Geraldton and Cellarbrations outlets identified in Table 7.

The Applicant does not rely upon their existence to suggest that further packaged-liquor availability is required. Rather, their presence is relevant to assessing the incremental effect of Froth's proposed takeaway privileges. The proposed restriction materially limits that incremental effect. Grant of the Tavern Licence as proposed would not establish another conventional bottle shop or general packaged-liquor retailer within the locality.

In particular, the Applicant does not propose to compete across the broad packaged-liquor market or sell the range of low-cost, high-volume packaged liquor products commonly associated with general bottle-shop retailing. Packaged liquor purchased for takeaway will be supplied for removal from the

Premises and not for consumption in the immediate vicinity. Applicable age-verification, RSA and refusal-of-service requirements will apply to takeaway transactions.

6.5 Relationship with the Geraldton CBD and Foreshore Precinct

The proposed Premises occupies a prominent position at 1 Cathedral Avenue at the interface between Geraldton's CBD and foreshore.

As addressed elsewhere in this Assessment, the City of Greater Geraldton's planning and revitalisation material recognises the city centre as an important focus for entertainment, food and beverage, tourism and visitor activity.^{72, 73}

The location is therefore relevant not because licensed premises should automatically be approved within the CBD, but because the proposed use is consistent with the broader hospitality, tourism and recreational character already established and strategically encouraged within the city centre and foreshore precinct.

The proposed Premises will also interact with substantial existing public activity in the surrounding area, including residents, workers, families using the foreshore, tourists, event attendees and cruise passengers. Those characteristics create both opportunities and responsibilities.

The location provides an opportunity for the Premises to contribute to activation, tourism, visitor dwell time, food and beverage choice and the broader attractiveness of the CBD and foreshore.⁷⁴ At the same time, the Applicant recognises the need to manage noise, patron behaviour, pedestrian movements, intoxication, interaction with members of the public and the safe departure of patrons.

6.6 Cumulative Impact and Potential Alcohol-Related Harm

The Applicant has considered whether the addition of another Tavern Licence within an established licensed precinct could contribute to cumulative alcohol-related harm or adverse amenity impacts.

Potential issues reasonably foreseeable in an established hospitality precinct include:

- increased movement of patrons between licensed premises;
- persons seeking entry to the Premises after consuming liquor elsewhere;
- intoxicated persons entering or attempting to enter the Premises;
- congregation of patrons within surrounding public areas;
- noise associated with patrons arriving at or departing from licensed premises;
- interaction between patrons of different venues;
- increased demand during weekends, major events, cruise visits and peak tourism periods; and
- potential impacts upon residents, businesses, workers and other users of the surrounding CBD and foreshore.

The Applicant does not seek to minimise those potential risks merely because the locality already contains other licensed premises.

Rather, those risks have informed the operational controls proposed throughout this Assessment.

The Applicant will apply RSA requirements to all patrons irrespective of whether liquor has previously been consumed at the Premises or elsewhere. A patron will not be presumed sober merely because they have recently entered Froth. Staff will monitor observable signs of intoxication and patron behaviour and will refuse service or entry where required.

The Applicant's broader controls include:

- RSA-trained staff and approved managers;
- monitoring of patrons upon entry and throughout their attendance;
- refusal of service to intoxicated persons;
- substantial food availability throughout trading;
- free drinking water;
- low- and non-alcoholic alternatives;
- responsible liquor promotion;
- CCTV;
- incident recording and management;
- appropriate staffing and security having regard to anticipated patron numbers, entertainment and identified risk;
- active management of outdoor areas;
- management of departing patrons; and
- reasonable assistance with safe transport and departure where required.

The Applicant intends to participate constructively in the Geraldton Liquor Accord, subject to applicable membership arrangements, providing an additional mechanism for communication and cooperation with WA Police, the City of Greater Geraldton, other licensees and relevant community stakeholders.

The Applicant's experience operating licensed premises in Exmouth, Bunbury and North Beach, including practical experience participating in the Bunbury Liquor Accord, provides relevant operational experience in implementing these controls in active hospitality environments.

6.7 Amenity, Quiet and Good Order

The Applicant recognises that the public-interest assessment extends beyond conduct occurring within the licensed Premises itself.

The operation of the proposed venue has the potential to affect the amenity, quiet and good order of the surrounding locality through matters including music and entertainment, patron noise, outdoor-area use, vehicle movements, pedestrian movements, departing patrons and interaction with surrounding businesses and residents.

The prominent CBD and foreshore location does not remove the Applicant's responsibility to manage these matters.

The Applicant will manage the Premises having regard to the nature and intensity of trade occurring at particular times. This includes appropriate management of entertainment and amplified music, monitoring outdoor areas, maintaining reasonable control of patron behaviour, adjusting staffing and security where necessary and taking reasonable steps to minimise disturbance associated with patrons departing the Premises.

Where particular events or periods of increased visitation are anticipated, management will assess whether additional staffing, security or other operational controls are appropriate. The Applicant will also maintain communication with relevant authorities and community stakeholders and will review its operational procedures where recurring or emerging amenity issues are identified.

This adaptive-management approach is consistent with the broader harm-minimisation framework described throughout this Assessment.

6.8 Existing Licensed Premises and Consumer Choice

The Applicant does not submit that the existence of other licensed premises demonstrates an unmet requirement for liquor within Geraldton. Nor does the Applicant contend that the public interest requires additional liquor availability merely to increase competition between existing businesses.

The relevance of consumer choice is instead considered in the context of the complete hospitality experience proposed.

Froth Craft Brewery Geraldton will introduce an additional established Western Australian craft brewery brand into the Geraldton market and combine that offering with substantial food service, indoor and outdoor dining, a dedicated children's playground, entertainment, events, tourism engagement and community activity.

The Applicant's community consultation provides direct evidence of anticipated community use of these characteristics, including substantial anticipated family and daytime/afternoon patronage.

The survey also demonstrates support for broader contributions associated with the proposed Premises. In particular, 592 of 1,096 respondents (54.01%) selected "promotion of Geraldton and its surrounds and increased tourism visitation to the Mid West" as an initiative they would like incorporated into Froth Geraldton. See section **5.13 Tourism Benefits** for more detailed analysis.

Separately, 899 of 1,029 respondents (87.37%) supported Froth adding to the vibrancy of Geraldton's town centre by supporting, hosting or promoting a greater number, diversity and quality of events and entertainment.

These results do not establish the public interest of the licence by themselves. They do, however, provide direct community evidence concerning the type of hospitality, tourism, events and community role respondents would like the proposed venue to perform. The proposed Premises should therefore be assessed as an integrated hospitality and community offering rather than simply as an additional point of liquor supply.

6.9 Overall Locality Assessment

The Applicant's locality assessment demonstrates that the proposed Premises will operate within an established Geraldton CBD and foreshore hospitality environment containing a range of existing licensed premises.

The Applicant does not contend that the existence of those premises itself establishes a requirement for, or public-interest justification for, another Tavern Licence. Nor does the Applicant suggest that the addition of another licensed premises is incapable of contributing to cumulative alcohol-related harm.

Rather, the relevant considerations are the particular nature of the proposed operation, the community it is intended to serve, the manner in which liquor will be supplied, the public-interest benefits identified throughout this Assessment and the measures proposed to manage foreseeable harm and amenity impacts.

Froth Craft Brewery Geraldton is proposed as a substantial food-focused, family-friendly craft brewery and hospitality venue rather than a premises principally directed toward high-volume liquor consumption.

Its proposed takeaway component will be deliberately restricted to products manufactured by the Applicant or its associated Froth Craft Brewery entity and will not operate as a conventional bottle shop or general packaged-liquor outlet.

The Applicant has identified foreseeable risks arising both from operation of the Premises itself and from its location within an established licensed precinct. Those risks include intoxication, cumulative liquor consumption, patron movement between venues, noise, security, departing patrons, interaction with surrounding public areas and the availability of takeaway liquor.

Corresponding controls have been identified throughout this Assessment.

The Applicant's established operating experience across three existing Western Australian licensed venues provides practical experience relevant to its capacity to implement those controls.

The locality also provides a strong strategic context for the proposed operation. The Premises occupies a prominent CBD and foreshore location within an established hospitality, tourism, recreational and events environment. The proposed venue has the capacity to contribute to food and beverage choice, family hospitality, CBD and foreshore activation, tourism, events, employment and community activity while complementing the broader Geraldton visitor experience.

Having regard to the character of the locality, the existing licensed environment, the proposed manner of trade, the restricted takeaway offering, the identified risks and mitigation measures, the Applicant's operating experience and the broader community, tourism, hospitality and employment benefits addressed throughout this Assessment, the Applicant considers that the proposed Tavern Licence can operate compatibly with the amenity, quiet and good order of the locality and consistently with the objects of the Liquor Control Act 1988 (WA).

7. Trading Hours

7.1 Proposed Trading Hours

The Applicant proposes the following ordinary trading hours for Froth Craft Brewery Geraldton.

These hours reflect the Applicant's anticipated day-to-day operating model and are intended to accommodate lunch, afternoon, dinner and evening trade while maintaining the Premises principally as a food-focused, family-friendly craft brewery, dining, entertainment and social venue.

Table 9: Proposed Ordinary Trading Hours – Froth Craft Brewery Geraldton

Day	Proposed Opening Time	Proposed Closing Time
Monday	11:00 am	10:00 pm
Tuesday	11:00 am	10:00 pm
Wednesday	11:00 am	10:00 pm
Thursday	11:00 am	10:00 pm
Friday	11:00 am	12:00 midnight
Saturday	11:00 am	12:00 midnight
Sunday	11:00 am	10:00 pm
Public Holidays	11:00 am	10:00 pm

The hours above represent the Applicant's proposed ordinary operating hours and are not intended to limit the Applicant from trading at other times lawfully permitted under a Tavern Licence in accordance with Section 98, or pursuant to an Extended Trading Permit or other approval granted under the Liquor Control Act 1988 (WA).

Where special events, public holidays, private functions, community events, tourism events or other appropriate occasions justify trading outside the Applicant's ordinary operating hours, the Applicant may trade within the parameters lawfully available to a tavern licensee or seek any additional approval required under the Act.

Any such trading will remain subject to the Act, the conditions of the Tavern Licence and any conditions imposed upon an applicable permit or approval.

7.2 Relationship Between Ordinary Trading Hours and Manner of Trade

The proposed ordinary trading hours reflect the anticipated day-to-day character of the Premises.

Froth Craft Brewery Geraldton is not proposed as a nightclub or a venue principally dependent upon late-night drinking. Its commercial offering will instead centre upon craft beer, food, dining, social occasions, family attendance, entertainment, events and the overall hospitality experience.

Opening from 11.00 am enables the Premises to cater for lunch and daytime trade, including residents, workers, families, tourists and visitors using the Geraldton CBD and foreshore precinct. Food will be available throughout trading hours, meaning that the character of the Premises will not transition from a food-based operation to a liquor-only operation later in the evening.

The proposed ordinary 10.00 pm closing time from Monday to Thursday, Sunday and public holidays reinforces the Applicant's intention that the Premises ordinarily operate principally as a daytime and evening hospitality venue. Friday and Saturday ordinary trading is proposed until midnight, recognising greater demand for evening hospitality and entertainment on weekends.

The Applicant nevertheless considers it important to retain the operational flexibility ordinarily available under a Tavern Licence. There may be particular occasions where earlier opening, later operation within permitted tavern hours, special functions or other variations are appropriate. Where such trading is authorised under the Tavern Licence, the Applicant may exercise those rights responsibly; where an additional permit or approval is required, the Applicant will obtain that approval before conducting the relevant trade.

The proposed ordinary trading hours are also consistent with the general trading pattern of the Applicant's associated Froth Craft Brewery venues in Exmouth, Bunbury and North Beach. Across those venues, the Froth group has substantial practical experience operating food-focused licensed premises across lunch, afternoon and evening periods, including busier Friday and Saturday evening trade, live entertainment, functions and special events.

This existing experience is relevant to the present Application because the proposed Geraldton trading model is not an untested operating format for the Froth group. The Applicant's directors and management have experience managing the operational issues associated with these trading periods, including staffing levels, RSA, patron intoxication, security requirements, entertainment, family patronage, outdoor areas, closing procedures and the orderly departure of patrons.

The Geraldton venue will therefore draw upon established operating practices developed through the group's existing licensed venues, while adapting those practices where necessary to the particular characteristics of the Geraldton Premises and surrounding locality.

7.3 Community Survey Evidence

The proposed ordinary trading hours are supported by the Applicant's community consultation in the survey (see Chart 3).

When respondents were asked when they would prefer to visit Froth Craft Brewery Geraldton, 1,125 respondents answered the question, with respondents able to select more than one period.

Table 10: Preferred Visiting Period from Applicant's Survey

Preferred Visiting Period	Respondents	Percentage
11.00 am – 2.00 pm	556	49.42%
2.00 pm – 6.00 pm	786	69.87%
After 6.00 pm	683	60.71%

The strongest preference was for the afternoon period between 2.00 pm and 6.00 pm, selected by 69.87% of respondents. Almost half selected the lunch period and 60.71% indicated that they would also like to visit after 6.00 pm.

The survey therefore indicates anticipated community use across lunch, afternoon and evening periods rather than demand being concentrated exclusively in late-night hours.

This is consistent with the Applicant's proposed ordinary manner of trade.

The Applicant does not rely upon these survey results as a harm-minimisation measure. Rather, they provide evidence concerning when members of the community anticipate using the Premises and assist in demonstrating the relationship between the proposed ordinary trading hours and expected use of the venue.

7.4 Family and Group Patronage

The proposed ordinary trading hours should also be considered alongside the anticipated composition of patrons.

As detailed elsewhere in this Assessment, of the 1,120 respondents who answered the survey question concerning who they would like to visit Froth with:

- 976 respondents (87.14%) indicated friends;
- 809 respondents (72.23%) indicated a partner;
- 752 respondents (67.14%) indicated family; and
- 512 respondents (45.71%) indicated their children.

The survey therefore indicates substantial anticipated social and family use of the Premises, including during daytime and afternoon periods.

This evidence is consistent with the proposed provision of substantial food service, indoor and outdoor hospitality areas and a dedicated children's playground.

The Applicant nevertheless recognises that family attendance does not remove the risks associated with the sale and consumption of liquor. RSA, patron monitoring, management of minors and other harm-minimisation controls will apply throughout all trading periods.

7.5 Evening and Higher-Risk Trading Periods

The Applicant has specifically considered the potential additional risks associated with busier evening trading, including Friday and Saturday trading until midnight and any special event or function which results in increased patron numbers or later trading.

Such periods may involve increased liquor consumption, greater patron numbers, patrons arriving after consuming liquor elsewhere, increased interaction between patrons of different venues and greater potential for noise or disturbance associated with departing patrons. These risks are particularly relevant given the Premises' location within the Geraldton CBD and foreshore hospitality precinct and the presence of other licensed premises within the locality. Accordingly, the Applicant will adopt a risk-based approach rather than treating every trading period identically.

Management will assess staffing and security requirements having regard to anticipated patron numbers, entertainment, events, functions, bookings, trading hours and other relevant circumstances.

During busier or higher-risk periods, particular attention will be directed toward patron intoxication, entry management, staffing levels, security requirements, outdoor areas, music and entertainment, noise, closing procedures and orderly patron departure.

The same approach will apply where the Applicant trades during additional hours lawfully available under its Tavern Licence or under an Extended Trading Permit. The availability of additional lawful trading hours will not result in any reduction in the Applicant's RSA, security, patron-management or amenity obligations.

The Applicant's experience operating the existing Froth venues is particularly relevant to the proposed Friday and Saturday trading until midnight. The Froth group already has practical experience managing licensed hospitality venues during comparable evening trading periods and understands that the risk profile of a venue can change as patron numbers increase, entertainment is provided and trading progresses later into the evening.

The Applicant will apply that experience at Geraldton through appropriate staffing, management supervision, RSA, security where warranted, monitoring of outdoor areas, management of entertainment and active management of patrons approaching closing time. The Applicant will not rely upon its operating history as a reason to diminish these controls; rather, that experience provides an established operational foundation for identifying and responding to the risks associated with the proposed hours.

7.6 Special Events, Functions and Extended Trading

Events and functions are intended to form an important part of the Froth Craft Brewery Geraldton offering. These may include private functions, community events, tourism-related activities, live entertainment, sporting occasions, celebrations and events associated with Geraldton's broader cultural and tourism calendar.

The Applicant intends to make reasonable use of the flexibility available to tavern licensees under the Liquor Control Act 1988 (WA).

Where a proposed event or function can lawfully occur within the permitted hours, manner of trade and licensed area applicable to the Tavern Licence, the Applicant may conduct the event within those parameters.

Where an event requires trading beyond the hours, area or other authorisation applying to the Tavern Licence, the Applicant will obtain the necessary Extended Trading Permit or other approval before conducting that aspect of the event.⁷⁵

Section 60 of the Liquor Control Act provides for Extended Trading Permits which can authorise trading at times, in circumstances or in places to which the underlying licence would not otherwise apply. Current RGL guidance also specifically provides for one-off extensions to trading hours and/or licensed areas.⁷⁶

The Applicant considers this framework appropriate because it provides operational flexibility for genuine special occasions while allowing any proposal falling outside the ordinary authorisation of the Tavern Licence to be considered in accordance with the Act.

The Applicant does not seek through this PIA to establish unrestricted late-night trading as part of the ordinary business model. Rather, the intention is to operate predominantly within the ordinary hours

identified in Table 10 while retaining the lawful flexibility available to a tavern licensee for appropriate events, functions and special occasions.

7.7 Entertainment and Events – Risk Management

The Applicant recognises that live music, special events and functions may alter the risk profile of the Premises, particularly where they attract larger patron numbers or extend into evening periods.

The nature of entertainment, anticipated attendance, hours of operation, use of outdoor areas and potential impact upon the surrounding locality will therefore be considered when determining appropriate staffing, security and venue-management arrangements. Where warranted, additional staff and/or licensed security personnel will be engaged.

The Applicant will take reasonable steps to ensure that entertainment and events do not result in unacceptable impacts upon the amenity, quiet and good order of the locality. Where additional licensing approval is required for a particular event, extended trading period or use of an area, the Applicant will obtain the relevant approval and comply with any specific conditions imposed.

7.8 Responsible Service Throughout Trading Hours

The Applicant's harm-minimisation obligations will apply throughout all trading periods, including ordinary trade, weekends, functions, special events and any trading conducted pursuant to an Extended Trading Permit or other lawful authorisation.

Relevant controls will include:

- appropriately trained staff and approved managers;
- active monitoring of liquor consumption and patron behaviour;
- refusal of service to intoxicated persons;
- appropriate age-verification procedures;
- food available throughout trading;
- free drinking water;
- a meaningful range of low- and non-alcoholic beverages;
- responsible liquor pricing and promotion;
- CCTV and active venue supervision;
- incident recording and review;
- appropriate management of minors;
- security where warranted by the circumstances; and
- management of departing patrons and surrounding amenity.

The Applicant's existing operation of licensed venues in Exmouth, Bunbury and North Beach provides practical experience in applying these measures across daytime, evening, entertainment, function and peak trading periods.

7.9 Closing and Departure of Patrons

The Applicant recognises that the end of a trading period requires active management and that potential impacts upon the locality do not necessarily cease when liquor service concludes.

Particular attention will therefore be given to the orderly departure of patrons, including following ordinary evening trade, functions, special events and any approved extended trading.

Staff and management will take reasonable steps to discourage patrons from congregating unnecessarily outside the Premises, creating excessive noise or engaging in behaviour that may adversely affect nearby residents, businesses, accommodation premises or other users of the CBD and foreshore.

Appropriate signage will be displayed at or near venue exits reminding patrons to respect neighbouring residents and businesses and to keep noise to a minimum when leaving the Premises.

Staff will be trained to reinforce this expectation verbally where appropriate, particularly during busier evening periods, special events and at closing time, by reminding departing patrons to leave the area quietly and respectfully.

Where appropriate, patrons will be assisted with information concerning taxis, rideshare services or other available transport options.

Management will monitor the immediate vicinity of the Premises during closing periods where circumstances warrant and will respond appropriately to behaviour associated with patrons departing the venue.

Where an event, function or approved extension of trading results in a later or more concentrated departure of patrons than would ordinarily occur, management will consider whether additional staff, security or departure-management measures are required.

These measures form part of the Applicant's broader commitment to protecting the amenity, quiet and good order of the surrounding locality.

7.10 Overall Assessment of Trading Hours

The Applicant considers that the proposed ordinary trading hours appropriately balance community demand, hospitality, tourism, entertainment and event benefits with the need to minimise alcohol-related harm and protect the amenity, quiet and good order of the locality.

The proposed hours enable the Premises to operate meaningfully across lunch, afternoon, dinner and evening periods and are consistent with the intended family-friendly, food-focused craft brewery and hospitality model. The community survey demonstrates anticipated patronage across each of these periods, with the strongest preference being for afternoon trade between 2.00 pm and 6.00 pm.

Importantly, the proposed trading hours are also consistent with the general trading model successfully operated across the Froth Craft Brewery group's existing licensed venues in Exmouth, Bunbury and North Beach. The Applicant's directors and associated entities therefore have substantial practical experience managing food-focused licensed venues across comparable daytime and evening trading periods.

This experience includes managing the changing operational requirements associated with lunch and afternoon trade, family patronage, busy Friday and Saturday evenings, live entertainment, functions and special events. It also includes the practical implementation of RSA, patron monitoring, appropriate

staffing and management supervision, security where warranted, management of outdoor areas, entertainment and noise, incident management and the orderly departure of patrons.

The proposed Geraldton trading model is therefore not a new or untested operating format for the Froth group. The Applicant intends to apply the systems, management experience and harm-minimisation practices developed through the operation of its existing venues to the Geraldton Premises, while adapting those measures to the particular characteristics of the Geraldton CBD and foreshore locality.

The Applicant's ordinary business model is not dependent upon late-night trading. However, the Applicant considers it appropriate that the Premises retain the flexibility lawfully available under a Tavern Licence to respond to private functions, special events, live entertainment, tourism activity, community events and other appropriate occasions.

Where such activities can lawfully occur within the hours and other parameters authorised by the Tavern Licence, the Applicant may trade accordingly. Where an Extended Trading Permit or other approval is required, the Applicant will obtain the necessary approval and comply with any conditions imposed.

This approach allows Froth Craft Brewery Geraldton to participate meaningfully in Geraldton's hospitality, tourism, entertainment and community calendar without seeking to establish unrestricted late-night trading as the ordinary character of the Premises.

Regardless of the particular trading period, the Applicant's RSA, patron-management, security, noise and amenity controls will continue to apply. Where an event, function, increased patron attendance or later trading period creates an elevated risk profile, staffing, security and other operational controls will be adjusted accordingly.

Particular attention will be given to the orderly departure of patrons during evening and higher-attendance periods. Appropriate signage will remind patrons to respect neighbouring residents and businesses and to keep noise to a minimum when leaving the Premises, and staff will be trained to reinforce this expectation verbally where appropriate.

Having regard to the proposed manner of trade, community survey evidence, location of the Premises, identified risks and mitigation measures, together with the Applicant's established experience operating comparable Froth venues, the Applicant considers that the proposed trading arrangements provide an appropriate balance between operational flexibility and responsible venue management and can be implemented consistently with the harm-minimisation and public-interest objectives of the Liquor Control Act 1988 (WA).

8. Conclusion

8.1 Overall Public Interest Assessment

The Applicant submits that, having regard to the evidence and matters addressed throughout this Public Interest Assessment, the grant of a Tavern Licence for Froth Craft Brewery Geraldton at 1 Cathedral Avenue, Geraldton is in the public interest.

The Applicant does not rely upon any single factor to establish the public interest. Rather, the Application should be considered having regard to the proposed manner of trade, demonstrated community support and preferences, characteristics of the locality, existing licensed environment, anticipated patron base, tourism and economic benefits, potential risks associated with the sale and

consumption of liquor, proposed harm-minimisation measures and the Applicant's substantial experience operating comparable licensed premises.

The current Public Interest Assessment requirements specifically require consideration of potential alcohol-related harm, impacts upon the amenity, quiet and good order of the locality, possible offence, annoyance, disturbance or inconvenience to people living or working nearby, and potential effects upon tourism, culture and the community.

The Applicant has sought to address each of these matters comprehensively. The Applicant has undertaken detailed inquiries into the Geraldton community and locality and has sought to identify not only the potential benefits associated with the proposed Premises, but also reasonably foreseeable risks arising from its operation.

Those risks include excessive consumption and intoxication; impacts upon children and young people; Aboriginal people and communities; people experiencing socioeconomic disadvantage; mining and FIFO/DIDO workers; illicit drug activity; cumulative impacts associated with existing liquor availability; patron movement between licensed premises; entertainment and functions; noise; evening trading; and the orderly departure of patrons.

Importantly, the Applicant has not approached this Assessment on the basis that community support for Froth means those risks do not exist.

Rather, the approach adopted throughout this Assessment has been:

community consultation and research → identification of potential benefits and risks → consideration of the particular Geraldton locality → development of practical mitigation and management measures.

The Applicant submits that the public-interest case therefore rests upon both the positive contribution the Premises is capable of making to Geraldton and the Applicant's demonstrated experience and commitment to responsibly managing the obligations associated with the grant of a Tavern Licence.

8.2 Demonstrated Community Support and Local Demand

The community consultation undertaken by the Applicant provides substantial evidence of local interest in the proposed venue and, importantly, information about how the Geraldton community anticipates using it.

The survey received 1,024 responses to its contact-details component.

Of those respondents, the Applicant's analysis identified 919 respondents, or approximately 89.7%, as providing Geraldton postcodes 6530, 6531 or 6532.

Accordingly, the survey is not principally evidence of support generated from existing Froth customers elsewhere in Western Australia. The overwhelming majority of respondents who supplied postcode information were from the Geraldton community itself.

The survey also demonstrates anticipated use of the Premises across a broad range of trading periods. Of 1,125 respondents answering the relevant question, 556 (49.42%) selected 11.00 am–2.00 pm, 786 (69.87%) selected 2.00 pm–6.00 pm and 683 (60.71%) selected after 6.00 pm.

The anticipated social composition of patronage is similarly broad. Of 1,120 respondents answering who they would like to visit Froth with, 976 (87.14%) selected friends, 809 (72.23%) a partner, 752 (67.14%) family and 512 (45.71%) children.

These responses support the Applicant's proposed model of a broad-based hospitality venue operating across lunch, afternoon, dinner and evening periods rather than a premises principally dependent upon late-evening liquor consumption.

The written comments reinforce this interpretation.

For example, respondents commented:

"Here for the good vibes and family/kid friendly space in town."

"Cannot wait for the opening! Just what Gero needs!"

"As a hospitality worker in the tourism industry in Geraldton - I'm very excited to see froth come to life on our town."

Another respondent described what they were seeking as:

"A great family place with music and chilled vibe would be great."

The Applicant considers these comments useful qualitative evidence because they demonstrate that community interest extends beyond access to liquor. Respondents repeatedly referred to food, families, children, live music, atmosphere, tourism, community involvement and the desire for an additional contemporary hospitality experience within Geraldton.

The Applicant does not contend that survey support alone establishes that the Tavern Licence should be granted. Rather, the survey provides direct evidence concerning anticipated community use of the Premises and has assisted the Applicant in shaping its proposed manner of trade and harm-minimisation measures.

8.3 Family-Friendly, Food-Focused Hospitality Offering

One of the clearest themes arising from the consultation was demand for a venue capable of accommodating families and children alongside adults using the Premises for food, socialising and entertainment.

Of 1,096 respondents answering the question concerning desired services, facilities and initiatives, 775 respondents (70.71%) selected a "Family-friendly and welcoming atmosphere", while 691 respondents (63.05%) selected a "Childrens' play area with activations & toys". Live music was selected by 772 respondents (70.44%).

The written responses reinforce those results.

One respondent stated:

"There is no licensed venue in the cbd to take kids for lunch that provides a playground or activities. Keep the kids happy and the parents hang around. Simple recipe. A menu that provides more than just pub food would be great as well. Looking forward to it."

Another observed:

"We have limited evening venues in Geraldton that are also suitable for young children, so anything that can help improve this will be well supported by parents and families."

Another respondent summarised the desired balance particularly clearly:

"I think a good all round approach would be brilliant, somewhere you can take you family and children but also somewhere you could go for a fun evening out with a partner or mates to watch sports or live music and events."

The Applicant has responded to this identified preference through the proposed venue design and manner of trade, including substantial food service, indoor and outdoor hospitality areas, a dedicated children's playground, family-oriented facilities, entertainment and a meaningful range of low- and non-alcoholic beverages.

The presence of families and children does not, in itself, prevent alcohol-related harm. The Applicant nevertheless considers the proposed family and food orientation relevant to the overall character and manner of trade of the Premises and has separately addressed the management of minors and responsible service of alcohol throughout this Assessment.

8.4 Community, Hospitality and Economic Benefits

The proposed Premises will introduce a substantial new hospitality operation within the Geraldton CBD and foreshore precinct.

The Applicant acknowledges that Geraldton already has a range of licensed hospitality premises, including an existing craft brewery. The Application is therefore not advanced on the basis that Geraldton lacks access to liquor or licensed premises.

Rather, the public-interest benefit arises from the particular combination of facilities, services and experiences proposed at Froth Craft Brewery Geraldton.

These include substantial food service; a broad range of Froth craft beer; Western Australian wine and spirits; low- and non-alcoholic beverages; indoor and outdoor hospitality; a dedicated children's playground; live entertainment; functions; community events; tourism-related activities; and a family-friendly environment within a prominent CBD and foreshore location.

The consultation demonstrates a desire for an offering that complements, rather than simply replicates, Geraldton's existing licensed premises.

One respondent commented:

"Bring that corner to life, it will be great to have another venue to compliment some of the ones we frequent already!!"

Another stated:

"Geraldton is in dire need of more great venues, especially ones with friendly, knowledgeable service... I'm really looking forward to enjoying some delicious food, great craft beers, and live music in a welcoming atmosphere."

The Premises will also create direct employment and support expenditure through local suppliers, contractors, trades, professional services, entertainers and other businesses involved in its construction and ongoing operation.

The Applicant intends to recruit locally wherever practicable and provide employment and training opportunities within the Geraldton community.

The Froth group's existing operations demonstrate that its venues operate as broader hospitality businesses incorporating kitchens, food service, employment, training, entertainment, community engagement and events rather than merely as points for the supply of liquor.

The Applicant intends to bring that established operating model to Geraldton.

8.5 Tourism, Events and CBD Activation

The Applicant considers the potential contribution to tourism, events and activation of the Geraldton CBD and foreshore to be a further positive public-interest consideration.

This is directly relevant under the current Public Interest Assessment framework, which expressly identifies tourism, culture and community impacts as matters relevant to the Director's consideration.

Geraldton is an established regional tourism destination and gateway to the wider Mid West and Australia's Coral Coast. The proposed Premises occupies a prominent position within the CBD and foreshore precinct and is capable of adding another substantial food, beverage, entertainment and leisure experience to the collective visitor offering.

The Applicant does not contend that Froth, by itself, will materially increase total visitation to Geraldton or generate a particular amount of visitor expenditure. The benefit is more appropriately characterised as strengthening the range of experiences available to visitors, encouraging engagement with the city centre and complementing the hospitality, tourism and events infrastructure already operating within Geraldton.

The community consultation strongly supports this role.

Of 1,096 respondents, 592 (54.01%) selected:

"Promotion of Geraldton and the stunning surrounds; promoting tourism and increased visitation to the Mid-West."

Of 1,029 respondents answering the question concerning services and experiences that could be provided under a Tavern Licence, 899 respondents (87.37%) supported:

"Adding to the vibrancy of Geraldton's town centre by supporting/hosting/promoting a greater number (and diversity and quality) of events and entertainment."

This sentiment is also apparent in the written comments.

One respondent stated:

"Very supportive of Froth joining our vibrant Geraldton community I think it will only enhance our tourist appeal and provide a point of difference from the currently available venues."

Another respondent, who expressly identified themselves as a Geraldton local, stated:

"I am a Geraldton local - born and raised - and I am fully supportive of Froth's proposal. It will support the economy, assist Geraldtons tourism and hospitality offering, provide employment, and maximise the city's investment in the foreshore precinct."

Another respondent expressed the aspiration for the location in broader terms:

“Adding a vibrant, modern eating and drinking venue on the foreshore would see Geraldton grow-up into a dynamic, exciting city to invite friends from the city. Make Geraldton a destination people consider visiting, not just leapfrogging to a town with sunset venues.”

These comments are opinions of individual respondents and are not relied upon as proof that particular tourism or economic outcomes will occur. They are nevertheless relevant qualitative evidence of the type of contribution members of the community would like the Premises to make.

The Applicant intends to respond to this demonstrated interest by developing appropriate relationships with Geraldton visitor-information and tourism organisations, promoting Geraldton and the Mid West through the venue and Froth’s digital channels, participating appropriately in Geraldton’s events calendar, and using the substantial local tourism and events experience available through Applicant director Tyson Overstone.

8.6 Harm Minimisation and Evidence That Community Concerns Have Been Considered

The Applicant recognises that the positive community, economic, tourism and hospitality benefits identified above must be considered alongside the potential harm that may arise from the use of liquor.

Harm minimisation has therefore been considered throughout this Assessment rather than treated as a secondary matter.

The Applicant has considered the characteristics of the Geraldton community and specifically assessed groups and circumstances which may require particular attention, including children and young people, Aboriginal people and communities, people experiencing socioeconomic disadvantage, mining and FIFO/DIDO workers, culturally diverse residents and visitors, tourists and persons who may otherwise be vulnerable to alcohol-related harm.

The Applicant has also undertaken a detailed assessment of the 3 kilometre locality surrounding the Premises, including the existing licensed environment and potential cumulative implications of introducing an additional Tavern Licence.

Importantly, the Applicant’s community consultation was not uniformly positive and the Applicant has not sought to present it as such.

For example, one respondent stated:

“I am excited to have Froth in Gero but we do unfortunately have an issue with Alcohol in town.”

Another raised practical concerns regarding:

“Adequate access, client parking and security...”

A further respondent questioned whether Geraldton could sustain the number of venues already operating in close proximity to the proposed Premises.

The Applicant considers these comments important.

They demonstrate why the Application cannot be assessed simply by counting supportive survey responses. They also reinforce the need for the Applicant to demonstrate how foreseeable alcohol-related, security, amenity and cumulative-impact risks will be managed.

The Applicant has accordingly proposed a comprehensive range of controls including RSA training and active management supervision; monitoring for intoxication; refusal of service or entry where required; age verification; substantial food availability; free drinking water; low- and non-alcoholic alternatives; responsible liquor pricing and promotion; CCTV; incident management; appropriate management of minors; risk-based staffing and security; management of entertainment and outdoor areas; noise controls; and active management of departing patrons.

The Applicant has also considered the cumulative licensed environment and has not relied upon the existence of other licences as evidence that another licence should automatically be granted.

Potential issues including pre-consumption elsewhere, intoxicated persons seeking entry, movement between licensed premises, interactions between patrons, congregation in public areas and noise associated with departing patrons have been expressly considered.

This demonstrates the Applicant's broader approach to community consultation: favourable comments have informed the proposed offering, while concerns and contrary views have informed the risk assessment and proposed mitigation.

8.7 Limited Takeaway Liquor

The Applicant also considers it important to distinguish the proposed Tavern Licence from the operation of a general packaged-liquor outlet.

The Applicant does not propose to operate the Premises as a bottle shop or general packaged-liquor retailer.

Any takeaway liquor sales are intended to be limited to products manufactured by the Applicant or its associated Froth Craft Brewery entity, Froth Craft Brewery Bunbury, with takeaway craft beer expected to be sold predominantly through growler fills.

The Applicant does not propose to sell takeaway packaged liquor manufactured by unrelated third-party producers and is willing to accept an appropriate condition restricting takeaway liquor sales accordingly.

Community consultation demonstrates support for this limited model. Of 1,029 respondents answering the relevant question, 672 respondents (65.31%) supported the offer of limited Froth craft beer packaged liquor, including growler fills, for takeaway consumption.

The proposed takeaway component is therefore ancillary to the brewery and hospitality experience rather than a principal retail function of the Premises and will not establish another general bottle shop within the locality.

8.8 Trading Hours, Functions and Special Events

The proposed ordinary trading hours have been designed around the anticipated use of the Premises across lunch, afternoon, dinner and evening periods.

Those hours are consistent with the general operating model of the Froth group's existing licensed venues in Exmouth, Bunbury and North Beach and provide the Applicant's directors and associated entities with substantial practical experience managing comparable periods of trade.

That experience includes management of family patronage, busy Friday and Saturday evening periods, live entertainment, functions and events, RSA, staffing, security, outdoor areas, noise, incident management and the orderly departure of patrons.

The proposed Geraldton model is therefore not a new or untested operating format for the Froth group.

At the same time, the Applicant considers it appropriate that the Premises retain the flexibility lawfully available under a Tavern Licence for private functions, special events, entertainment, tourism activities and other appropriate occasions.

Where such activities can lawfully occur within the parameters of the Tavern Licence, the Applicant may trade accordingly. Where an Extended Trading Permit or other approval is required, the Applicant will obtain the relevant approval before conducting that aspect of the event. Current RGL guidance confirms that separate approvals may be required where a licensee seeks to extend the authorised hours, area or manner of trade.

Regardless of the particular trading period, the Applicant's RSA, patron-management, security, noise and amenity controls will continue to apply.

Particular attention will be given to the orderly departure of patrons during busy evening periods, functions and events. Signage will be displayed at or near venue exits reminding patrons to respect neighbouring residents and businesses and to keep noise to a minimum when departing, and staff will be trained to reinforce this expectation verbally where appropriate.

8.9 Experienced and Responsible Operator

A significant consideration in assessing the proposed operational controls is that the Froth Craft Brewery model has already been implemented across three licensed venues in Western Australia.

The Froth group operates licensed premises in Exmouth, Bunbury and North Beach, providing the Applicant's directors and associated entities with substantial practical experience in the operation of food-focused, family-friendly craft brewery and hospitality venues.

This experience extends beyond compliance with RSA requirements.

It includes managing substantial kitchens and food service, families and children within licensed premises, outdoor hospitality areas, live entertainment, functions, community events, busy trading periods, security requirements, patron welfare, intoxication, incidents, closing procedures and relationships with surrounding communities.

The Applicant does not contend that successful operation elsewhere removes the need to assess the Geraldton Application independently.

Rather, the existing operating history provides practical evidence that the Applicant's directors have experience implementing the types of management and harm-minimisation measures proposed throughout this Assessment.

The survey comments also demonstrate that some respondents have direct experience of existing Froth venues.

For example:

"So excited to see this happen as have always loved our regular visits to Exmouth."

Another stated:

“So excited, have just been to the Exmouth one with the kids in school holidays. Amazing and can't wait to see what you guys do at our home!!”

Another commented:

“Have visited Froth Exmouth Froth North Beach and the vibes are perfect for Geraldton people.”

These comments are not relied upon as independent evidence of regulatory compliance. They do, however, demonstrate that some of the Geraldton community's support for the proposed venue is informed by first-hand experience of the Froth hospitality model elsewhere in Western Australia.

The Geraldton venue will draw upon the systems and experience developed across those existing operations while adapting them to the particular characteristics and risks of the Geraldton Premises and locality.

The Applicant submits that the evidence contained throughout this Public Interest Assessment supports the conclusion that the grant of the Tavern Licence for Froth Craft Brewery Geraldton is in the public interest.

The Application is not advanced merely on the basis that Froth is popular, that Geraldton can accommodate another licensed premises, or that a substantial number of people responded positively to a community survey.

Rather, the Application presents a comprehensive hospitality proposal with identifiable community, tourism, economic, cultural, entertainment and leisure benefits, accompanied by detailed consideration of the potential harms and impacts associated with the sale and consumption of liquor.

The proposed Premises will provide a substantial food-focused and family-friendly craft brewery and hospitality venue within Geraldton's CBD and foreshore precinct; provide additional dining, leisure, entertainment, function and social opportunities; incorporate a dedicated children's playground; create employment and training opportunities; complement Geraldton's tourism and visitor offering; contribute to events and activation within the city centre; and provide opportunities to promote Geraldton, the Mid West and surrounding visitor experiences.

The community consultation provides substantial quantitative evidence supporting those aspects of the proposal.

It also gives that evidence a human dimension.

Respondents described wanting:

“a great family place with music and chilled vibe”;

“a modern venue with ocean views, high quality food”;

“a fun inviting venue with activity's for kids music for adults and nice beverages”; and

a venue that would “bring that corner to life”.

Perhaps most importantly, the consultation was not treated simply as an exercise in gathering statements of support.

Respondents also raised concerns about alcohol-related harm, security, parking, children, dogs, noise, affordability, the existing number of licensed premises and the type of hospitality environment they wanted Froth to create.

The Applicant has considered those views throughout this Assessment.

The Applicant does not suggest that the potential risks associated with a Tavern Licence can be eliminated entirely. The relevant issue is whether those risks have been reasonably identified and whether appropriate measures can be implemented to minimise and manage them. The Applicant submits that they have, and that they can.

The proposed food-focused manner of trade, venue design, family orientation, responsible liquor promotion, substantial food availability, low- and non-alcoholic alternatives, trained staff, active management, RSA procedures, CCTV, security where warranted, incident management, noise controls, safe-departure procedures and capacity to adjust operational controls according to the risk profile of particular trading periods collectively provide a comprehensive framework for responsible operation.

The limited takeaway-liquor model further distinguishes the Application from a general packaged-liquor retail operation. Takeaway liquor is intended to be restricted to Froth-produced products or products manufactured by the associated Froth Craft Brewery Bunbury entity, predominantly through growler fills, and the Applicant is willing to accept an appropriate licence condition giving effect to that restriction.

Importantly, the proposed management measures are supported by practical experience.

The Applicant's directors and associated entities have experience operating Froth licensed venues in Exmouth, Bunbury and North Beach under comparable food-focused, family-friendly hospitality models and across comparable ordinary trading periods.

The Applicant has therefore approached the proposed Geraldton venue with both an understanding of the opportunities presented by the location and practical knowledge of the responsibilities associated with operating a substantial licensed hospitality venue.

The Applicant submits that this Assessment demonstrates genuine due diligence. The Applicant has consulted the community. It has examined who lives within and uses the locality. It has considered existing liquor availability. It has identified potentially vulnerable groups. It has considered the implications of children and families attending the Premises. It has assessed tourism, employment, events and community benefits. It has considered trading hours, entertainment, functions, patron movement, security, noise and the departure of patrons. It has considered both supportive and contrary community views.

Most importantly, where reasonably foreseeable risks have been identified, the Applicant has proposed practical measures intended to minimise and manage those risks.

Having regard to the totality of that evidence, the Applicant respectfully submits that Froth Craft Brewery Geraldton is capable of making a positive contribution to the Geraldton community, CBD, foreshore precinct and visitor economy while operating within an appropriate framework for the minimisation of alcohol-related harm and the protection of the amenity, quiet and good order of the locality.

Accordingly, the Applicant respectfully requests that the Director of Liquor Licensing determine that the grant of the Tavern Licence for Froth Craft Brewery Geraldton at 1 Cathedral Avenue, Geraldton is in the public interest and grant the Application.

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