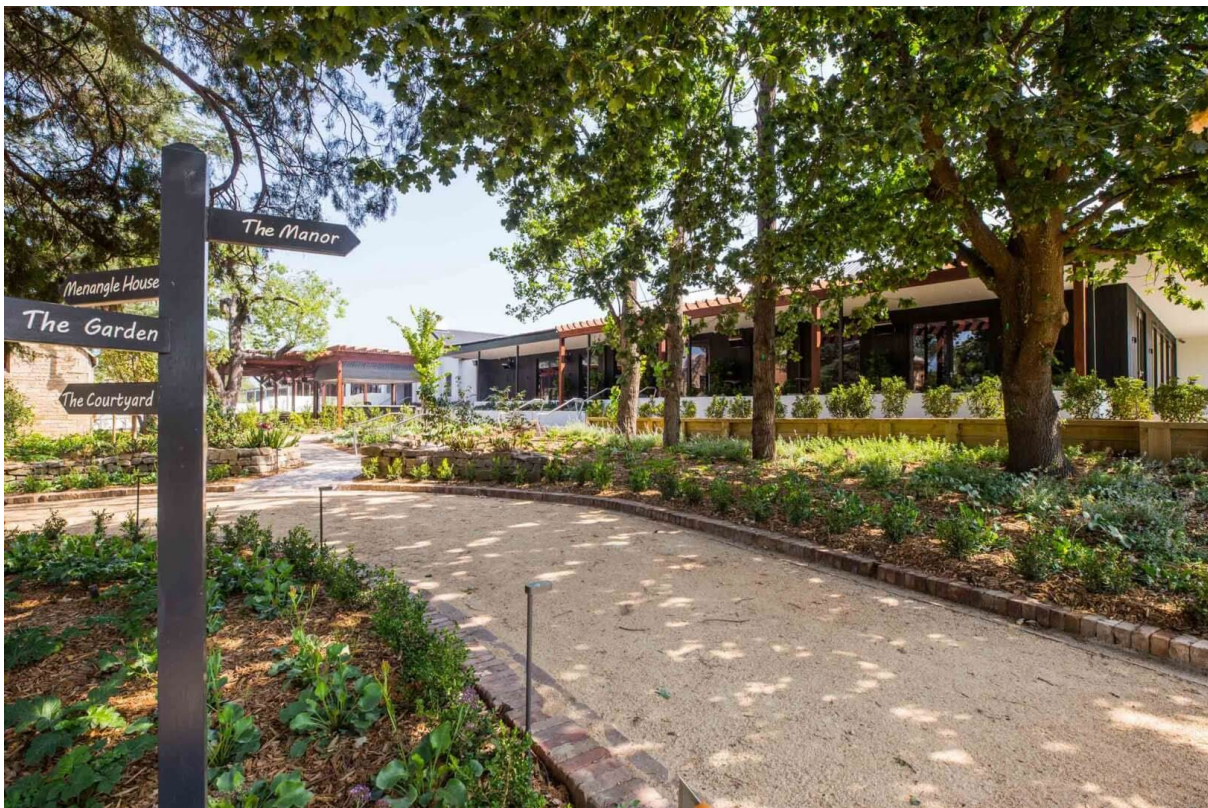


Class 1 Local Impact Assessment for Club establishing in New Development Area

Menangle Country Club

170 Menangle Road, Menangle Park NSW 2563



New South Wales Harness Racing Club

A.C.N. 000 002 666

30 November 2021

Prepared by



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**NEW SOUTH WALES HARNESS RACING CLUB
CLASS 1 LOCAL IMPACT ASSESSMENT FOR MENANGLE COUNTRY CLUB
ESTABLISHING IN NEW DEVELOPMENT AREA**

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1. EXECUTIVE SUMMARY

1.1 OUTLINE

This document is a Class 1 Local Impact Assessment (“LIA”) to accompany an application by New South Wales Harness Racing Club Ltd (“the Applicant”) for a gaming machine threshold increase pursuant to section 34 of the Gaming Machines Act 2001 (“the Act”). The LIA is made pursuant to section 37A of the Act in respect of special provisions for clubs establishing in new development areas. Although the Applicant may apply for a gaming machine threshold increase of up to 150, in this case, the Applicant seeks approval for a gaming machine threshold increase of just 50 for its premises known as Menangle Country Club (“the Venue”). The Venue is situated in a ‘new development area’ as defined by section 37A(1) of the Act. The area is identified by an environmental planning instrument as an urban release area (see Urban Release Area Map – Sheet URA_003 published by Campbelltown City Council at Annexure A). The new development area does not have the full benefit of the services and facilities of the kind provided by clubs.

1.2 VENUE LOCATION

The Venue is located at 170 Menangle Road, Menangle Park NSW 2563 in the Band 2 *Rosemeadow-Glen Alpine* Statistical Areas Level 2 (“SA2”) in the Local Government Area (“LGA”) of Campbelltown. A map showing the Venue’s location is shown in Section 2.3.

1.3 GAMING MACHINE THRESHOLD & GAMING MACHINE ENTITLEMENTS

The Venue’s current gaming machine threshold is 39 and the Venue has 39 gaming machine entitlements and 39 gaming machines in operation.

1.4 HARM MINIMISATION AND RESPONSIBLE GAMBLING MEASURES

Section 7 details the current mandatory and additional harm minimisation and responsible gambling practices adopted by the Applicant at the Venue. The Applicant operates its gaming machine operations at its premises in strict accordance with regulated and ‘best-practice’ initiatives of responsible gambling. The Applicant is a member of the ClubSafe program operated by ClubsNSW and supports its best practice guidelines and policies.

1.5 POSITIVE CONTRIBUTIONS TO THE LOCAL COMMUNITY

Section 10 of this Report details the positive contributions that will be derived from approval of the Application in terms of the benefits of establishing the Venue and the contributions to the Responsible Gambling Fund. The major positive contribution is the Venue itself which offers state-of-the-art amenities with dining, bar and entertainment services, formal functions facilities catering for up to 250 seated persons, substantial outdoor garden and recreation areas, several free-standing buildings capable of hosting unique and diverse entertainment and function services, historic Menangle House with heritage recognition, children’s outdoor playground and play facility and children’s in-club electronic games facility. The Applicant’s Master Plan includes addition of a fitness centre (with weights room, fitness area, pool and exercise rooms), tennis courts, sports facilities and a motel. The Venue will be relevant to its proposed family-oriented local community and LGA by way of its provision of recreational facilities and hospitality services. It will also employ approximately 120 people, stimulate the economy during further construction and, most importantly, provide dedicated recreational areas in a community clearly lacking in social infrastructure. It is the Applicant’s view that the Venue and its further development will provide the people of the LGA and the local community with the same opportunities as do several communities in NSW through the provision of a club venue and associated benefits.

1.6 SUBMISSION

Given the satisfaction of the requirements of the legislation, conduct of gaming operations at the Venue in a responsible manner and the evidence of substantial positive contributions to the local community, it is the Applicant’s belief that this LIA meets the requirements of the legislation and should be approved.

2. THE VENUE & THE LOCAL COMMUNITY

2.1. THE VENUE

The Venue is located at 170 Menangle Road, Menangle Park NSW 2563 in the *Rosemeadow-Glen Alpine* SA2 in the Campbelltown LGA. The *Rosemeadow-Glen Alpine* SA2 is, except for the *Holsworthy Military Area* SA2, the largest geographical area in the Campbelltown LGA. It is bordered by parts of the *Campbelltown-Woodbine* SA2 and the *Mt. Annan-Currans Hill* SA2 to the north, the *Bradbury-Wedderburn* SA2 to the east and the *Douglas Park-Appin* SA2 (Wollondilly LGA) to the west and south.

The Venue is establishing in a new urban release area as shown in Annexure A. Annexure B shows the location of the Venue on the border of the first proposed residential development by the Dahua Group within the subject Urban Release Area. The overall area of the Venue is approximately 13,000m², which comprises an area of about 9,000m² dedicated to the Venue's licensed club area and approximately 4,000 m² to car parking areas and driveways. The designated licensed club area includes a clubhouse with internal back of house areas of about 300m², internal front of house areas of 1,400m², external pathways and stairs of about 800m², external covered areas of about 300m² and free-standing buildings, lawns, pathways, courtyards and garden areas of about 6,200m². The Venue's property configuration is quite unusual for a registered club as more than two-thirds (⅔) of its designated licensed area is dedicated to outdoor recreation, entertainment and functions facilities. Those areas are all subject to the entry restrictions which apply to registered clubs pursuant to the Registered Clubs Act 1976 to ensure the security of the Venue's property, to encourage members-only usage and to promote the concept that the Venue exists to service the local community. An architect's plan of the Venue is shown at Annexure C and images of the venue's premises and facilities are shown at Annexure D. Annexure E shows the current location of the Venue's existing 39 gaming machines and the area that is designated to accommodate the additional machines.

There are no schools, places of worship or hospitals within 200 metres of the Venue. The nearest school is Broughton Anglican College in Menangle Park situated 2km from the Venue and the nearest church is St. James Anglican Church in Menangle situated 2.6km from the Venue.

2.2 THE LOCAL COMMUNITY

For a Class 2 LIA, clause 34(6) of the Regulation states that the *local community* comprises the following—

- (a) *the people in the area (or in the group) from which the persons using the services and facilities of the venue concerned are likely to be drawn,*
- (b) *the people in the area (or in the group)—*
 - (i) *that is to derive, or that the Authority considers is likely to derive, social or economic benefit if the threshold increase application is approved, or*
 - (ii) *that is to suffer, or that the Authority considers is likely to suffer, social or economic detriment if the threshold increase application is approved.*

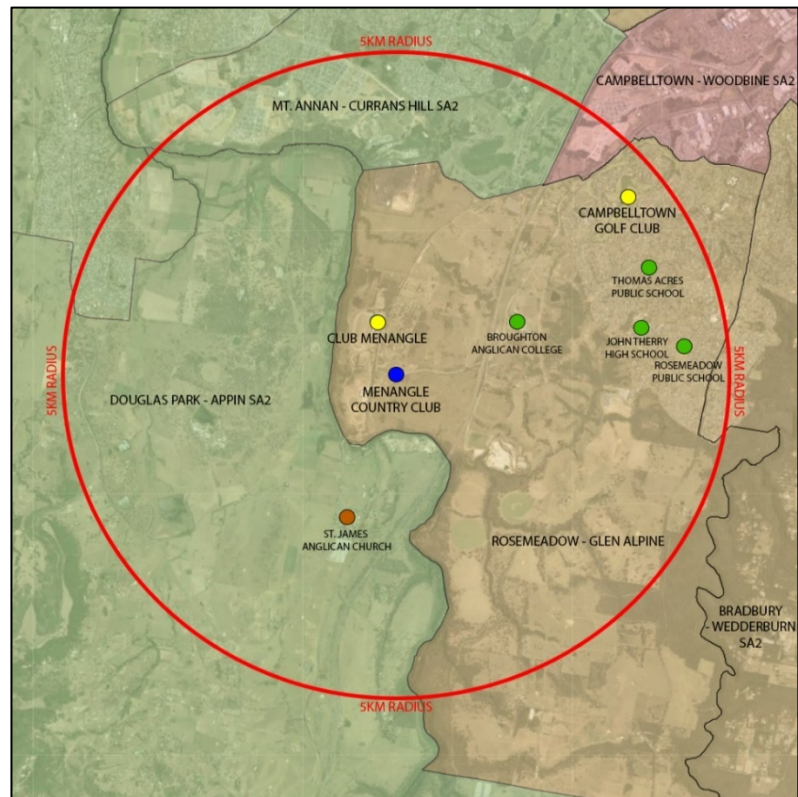
For the purposes of this Class 1 LIA, we submit it is appropriate to apply the above definition of local community even though its application is confined to a Class 2 LIA. Within 5km of the Venue, the local community from which the Venue's patrons are likely to be drawn encompasses substantial parts of the SA2 areas of:

<u>Principal SA2</u>	<u>Population</u>
Rosemeadow-Glen Alpine	20,880
<u>Adjoining SA2 within 5km of the Venue</u>	<u>Population</u>
Bradbury-Wedderburn	18,963
Campbelltown-Woodbine	18,192
Douglas Park-Appin	9,626
Mount Annan-Currans Hill	28,575
<u>Total</u>	<u>75,356</u>

2.3 DEMOGRAPHY

The Campbelltown LGA is located 53 kilometres southwest of the Sydney CBD. Covering an area of 312 square kilometres the LGA extends from Glenfield in the north, Menangle Park in the south, the Scenic Hills in the west and the Holsworthy Military Reserve to the east. Campbelltown is seen as the gateway to the Hume Motorway that connects the area with the Southern Highlands, Macarthur and Wollongong. In 2016, Campbelltown LGA comprised 55,279 dwellings with a population of 157,006 persons.

62% of the population in the Campbelltown LGA was Australian born. The rate of unemployment in the Campbelltown LGA was 7.9% compared to NSW at 6.3%. By 2019, the population had grown to 170,943 persons with 25% of the population aged less than 18 years, 35% aged between 25 to 49 years and 7.2% aged 70 years or more.¹



In 2016, the population of the *Rosemeadow-Glen Alpine* SA2 was 20,880 persons with 29% of the population aged less than 20 years, 33% aged between 25 to 49 years and 7% aged 70 years or more. The median age of people residing in the Campbelltown LGA was 35 years compared to the NSW median age of 38 years.²

For the year ended August 2021, the ranking of annual gaming machine expenditure per gaming machine for Campbelltown LGA and the two (2) adjoining LGA's compared to State-wide data is summarised as follows:²

LGA	Ranking	Expenditure	No. of Clubs	No. of machines	Average Expenditure per Gaming Machine
Camden	1	\$26,579,393	5	419	\$63,435
Campbelltown	2	\$97,409,658	10	1,611	\$60,465
Wollondilly	3	\$3,115,747	5	159	\$19,596
Totals		\$127,104,798	20	2,189	\$58,065
N.S.W. Totals		\$3,606,856,387	1,038	64,986	\$55,502

Source: Liquor & Gaming NSW - Gaming Machine Annual Report by Local Government Area (LGA) for the Period 1 September 2020 to 31 August 2021

Currently, there are approximately 8,000 financial members of the Venue comprising approximately 430 members who reside in the *Rosemeadow-Glen Alpine* SA2 and 7,570 who reside outside the *Rosemeadow-Glen Alpine* SA2.

Supplementary demographic information is included in Section 9 of this report.

¹ Source: Campbelltown City Council

² Source: Australian Bureau of Statistics - 2016 Census

3. BRIEF APPLICANT HISTORY

The Applicant is a public company limited by guarantee incorporated as the New South Wales Trotting Club Ltd on 10th October 1902. The principal objects of the Applicant are to conduct a harness racing club and to promote and advance the sport of harness racing. In 1911, the Applicant was recognised by the Colonial Secretary as the controlling authority of harness racing in New South Wales. The club retained that status until 1976, when control was transferred to the Trotting Authority of New South Wales, now known as Harness Racing NSW.

The Applicant held its inaugural race meeting on 19th November 1902 at its original racecourse in Glebe, later to become known as Harold Park Paceway. The Applicant began holding harness racing meetings at its Menangle Park Paceway, Racecourse Road, Menangle Park ("the racecourse property") from 26th September 1953, operation of which continues to present day.

On 10th November 1986, the Applicant changed its name to New South Wales Harness Racing Club and on 21st July 1994 it achieved registered club status (Club Licence No. LIQC330010008) operating at its premises in Ross Street, Glebe. The last race meeting held at Harold Park was on 17th December 2010 following which the Applicant re-located its racecourse headquarters and its registered club premises to the racecourse property in 2011. From 10th February 2016, the Applicant has operated under the business name of Club Menangle.

4. BACKGROUND TO ESTABLISHING THE VENUE

In 2015, the Applicant became aware of the release by Campbelltown City Council of the Campbelltown Local Environmental Plan 2015 and the Campbelltown (Sustainable City) Development Control Plan 2015. Part of those plans included proposals for a new urban release area as shown in the Urban Release Area Map – Sheet URA_003 published by Campbelltown City Council encompassing Menangle Park (see Annexure A), which provided for low-medium density residential housing developments.

In anticipation of the proposed growth of residential housing in the Urban Release Area, the Applicant purchased the property at 170 Menangle Road, Menangle Park, formerly the site of a licensed hotel known as the Horse & Jockey Inn. The property was purchased with the intention of re-developing its buildings and grounds into a first-class club facility in anticipation of satisfying the future requirements and demands of the developing communities in Menangle Park and surrounding areas.

Following practicable completion of the Venue, the Independent Liquor & Gaming Authority ("ILGA") approved the Venue as a registered club on 16th December 2019 (Club Licence No. LIQC330019636) with a gaming machine threshold of zero. Prior to the opening of the Venue, the Applicant applied for a gaming threshold increase of 39 and transfer of 39 gaming machine entitlements from its club premises at the racecourse property to the Venue, which applications were subsequently approved by ILGA.

5. FINANCIAL INFORMATION

As of 30th June 2021, the Statement of Financial Position of the Applicant showed Total Assets valued at \$183.387 million comprising mainly of investments of \$85.282 million and real estate, plant and equipment valued at \$90.775 million. Total Liabilities were \$4.126 million resulting in Net Assets of \$178.771 million.

For the Financial Year ended 30th June 2021, the Statement of Financial Performance of the Applicant showed Total Net Profit of \$11.242 million.

The financial position and trading performance of the Applicant will support the further establishment of the Venue and the provision of excellent club facilities well into the future.

6. BASIS FOR THE APPLICATION

The Applicant relies on section 37A of the Act. Subsection (1) of section 37A of the Act defines a 'new development area' as an area of land in a Band 1 LSA or Band 2 LSA that—

- (a) *is identified by an environmental planning instrument as an urban release area (or such other description as the Authority considers to be similar), and*
- (b) *does not, in the opinion of the Authority, have the full benefit of the services and facilities of the kind provided by clubs.*

Subsection (2) of section 37A of the Act provides that a class 1 LIA may be provided with a threshold increase application in relation to the premises of a club that are situated in a new development area if —

- (a) *the number to which the application relates is not more than 150, and*
- (b) *the Authority is satisfied that the acquisition of a corresponding number of gaming machine entitlements in respect of those premises would not increase the density of gaming machines in the local statistical area in which the premises are situated to the extent that the classification of the area is affected.*

The Applicant submits that, for the purposes of section 37A of the Act, —

- (a) the Venue is situated in a Band 2 LSA.
- (b) the Venue's licensed premises are situated in a new development area as defined by subsection (1) of section 37A of the Act.
- (c) the new development area does not have the full benefit of the services and facilities of the kind provided by clubs.
- (d) the Venue commenced providing limited facilities and services from 7th February 2020.
- (e) the Venue is still in its establishment phase and will continue the ongoing process of developing the Venue's facilities and services.
- (f) the gaming machine threshold increase to which the application relates is not more than 150, and
- (g) the acquisition of a corresponding number of gaming machine entitlements in respect of those premises would not increase the density of gaming machines in the local statistical area in which the premises are situated to the extent that the classification of the area is affected.

The Class 1 LIA process guidelines state that ILGA may only approve a Class 1 LIA if it is satisfied that the LIA:

- complies with the requirements under the Act or Regulation,
- demonstrates that gambling activities at the venue will be conducted in a manner consistent with sound gambling harm minimisation principles and practices,
- demonstrates that the proposed increase in gaming machines for the venue will provide a positive contribution to the community in which the venue is situated,
- if the venue is a new hotel or club, the venue is not in the immediate vicinity of a school, place of public worship or hospital, and
- community concerns arising out of the community consultation process have been appropriately addressed by the venue.

The new development area lacks the full benefit of the services and facilities of the kind provided by clubs.

There is only one other club premises in the 'new development area' which is the Applicant's separate club premises known as 'Club Menangle' (Club Licence No. LIQC330010008) situated at the racecourse property. The club licence for those premises was originally granted in July 1994 for its premises in Glebe and in 2011 the licence was transferred to the racecourse property.

In support of the condition stated in section 37A(1)(b) of the Act, club facilities and services at Club Menangle are quite minimal and lack the full benefit of the services and facilities of the kind provided by clubs. Club Menangle is only available for member access and trading for just two days per week (Tuesday afternoons and Saturday evenings) for about 6 hours each day. This is because those club facilities and services are primarily provided for the specific purpose and benefit of members and visitors who are part of the harness racing fraternity and who attend the Applicant's harness racing meetings. Thus, the trading hours of Club Menangle generally coincide with the conduct of the Applicant's official twice-weekly harness racing meetings.

Moreover, the Applicant's racecourse property, buildings and facilities as well as associated harness racing stables and facilities owned by Harness Racing NSW are bounded by the Intercity Southern Highlands Rail Line, which runs between the Campbelltown and Goulburn railway stations to the east, and the Nepean River to the west. The precinct comprising those properties is isolated and vehicular access is available only via two (2) narrow roads which pass under railway tunnels. Hence, owing to restricted accessibility and for general security of the precinct, those access roads are locked in the late afternoon and re-opened at dawn, which significantly compromises the ability of Club Menangle to provide services and facilities expected of a club, particularly for night-time trade.

Thus, the 'new development area' does not and will not have the full benefit of the services and facilities of the kind provided by clubs, except for those provided by the Venue. Moreover, the needs of present residents and thousands of future residents of the various new housing precincts in the 'new development area' for club style facilities can only be satisfactorily serviced by the Venue.

The only other club located within 5 kilometres of the Venue is Campbelltown Golf Club, which is a smaller club with inferior services located almost 5 kilometres from the Venue, whose principal objects are to foster and support the game of golf.

The Venue will provide a state-of-the-art community facility which is needed as part of the social and economic infra-structure of the new development area. The Applicant will stage the development to eventually provide an entire suit of recreation and social facilities at the Venue including:

- Food service areas including outdoor pavilions for alfresco dining providing vistas around the Venue.
- Gaming machine, TAB and Keno facilities.
- Four bars and lounge areas.
- Formal functions facilities catering for up to 250 seated persons.
- Various function spaces cater for receptions, corporate events and other celebrations.
- Live entertainment areas for members and their guests to enjoy free entertainment.
- Substantial outdoor garden and recreation areas.
- Several free-standing buildings capable of hosting unique and diverse entertainment and function services.
- Historic Menangle House with heritage recognition.
- Children's play areas incorporating computer game consoles and play equipment for children.
- A motel.
- Fitness centre, tennis courts, sports facilities.
- The Venue will provide much needed services to its immediately surrounding suburbs as well as to suburbs further away and not currently serviced by registered clubs.

7. HARM MINIMISATION & RESPONSIBLE GAMBLING MEASURES

The Applicant's gaming machine operations in its two venues ("the club premises") are in strict compliance with mandatory and optional responsible gambling measures and are considered best practice and reinforced by the ClubSafe Best Practice Harm Minimisation Program.

The Applicant operates its responsible gambling policy in accordance with the mandatory requirements of the Act and the Regulation, including the following measures –

- 7.1 The Applicant displays a notice providing information about the chances of winning a major prize from the operation of approved gaming machines on the club premises in each part of the club premises where approved gaming machines are located in such a manner and in such a place that it would be reasonable to expect that a person entering the part of the club premises in which the notice is displayed would be alerted to its contents (Ref: clause 18 of the Regulation).
- 7.2 The Applicant makes copies of approved player information brochures available to patrons of the club in each part of the club premises in which approved gaming machines are located and displays them in a manner and place so that it would be reasonable to expect that a person entering the part of the club premises in which the brochures are required to be available would be alerted to their presence (Ref: clause 20 of the Regulation).
- 7.3 The Applicant supplies an approved player information brochure in a foreign language (currently Arabic, Chinese, Korean, Turkish and Vietnamese) as soon as practicable after a patron request and maintains sufficient stocks of such foreign language brochures so as to reasonably achieve compliance (Ref: clause 21 of the Regulation).
- 7.4 The Applicant attaches and displays on each approved gaming machine kept on the club premises (a) a warning notice about gambling, and (b) a notice about getting help with problem gambling in an approved form and positions them in a way so as to enable a person to clearly see the notice while playing the gaming machine (Ref: clause 22 of the Regulation).
- 7.5 The Applicant displays an approved notice containing information about the availability of gambling counselling services positioned at the main entrance to the club premises in a way that is likely to cause each person entering the club premises to be alerted to its contents (Ref: clause 23 of the Regulation).
- 7.6 The Applicant displays an approved notice about getting help with problem gambling on, or in the immediate vicinity of, each automatic teller machine (ATM) or cash-back terminal installed on the club premises positioned so as to enable a person to clearly see the notice while using the ATM or cashback terminal (Ref: clause 24 of the Regulation).
- 7.7 The Applicant pays so much of a prize that exceeds \$5,000 by means of a crossed cheque payable to the person or, if the person so requests, by means of electronic funds transfer (if those means are available to the club) to an account nominated by the person (Ref: clause 26(1) of the Regulation).
- 7.8 If the total prize money payable to a person exceeds \$5,000 the Applicant, if the person so requests, pays the whole of the total prize money by means of electronic funds transfer (if those means are available to the club) to an account nominated by the person (Ref: clause 26(2) of the Regulation).
- 7.9 The Applicant does not issue a prize winning cheque unless (a) it is clearly identified as a prize winning cheque and (b) the cheque is endorsed with the phrase - "Prize winning cheque—cashing rules apply" (Ref: section 47B of the Act and clause 27 of the Regulation).

- 7.10 The Applicant does not permit a facility for the withdrawal or transfer of money from a bank or authorised deposit-taking institution (such as an ATM or EFTPOS terminal) to be located in a part of the club premises in which approved gaming machines are located (Ref: clause 28 of the Regulation).
- 7.11 The Applicant does not permit a cash dispensing facility to be used or to be installed or located in any part of club premises if the facility is capable of providing cash from a credit card account (Ref: section 47C of the Act).
- 7.12 The Applicant does not display or cause to be displayed any gambling-related sign anywhere outside or in the vicinity of the club premises or anywhere inside the club premises so that it can be seen from outside the club premises (Ref: section 44 of the Act).
- 7.13 The Applicant does not publish or cause to be published any gaming machine advertising in any form that gives publicity to, or otherwise promotes or is intended to promote, the playing of approved gaming machines on the premises of a club, unless it appears or is stated inside or on the premises of a club, and it cannot be seen or heard from outside the club (Ref: section 43 of the Act and clause 41 of the Regulation).
- 7.14 Because participant activity in relation to playing gaming machines is recorded by electronic means at the Venue, the Applicant provides player activity statements in the approved form under section 45(4) of the Act to players upon request and free of charge (Ref: section 45 of the Act and clause 42 of the Regulation).
- 7.15 The Applicant, or any person representing the Applicant, does not and will not disclose information contained in a player activity statement to any person other than the player to whom the information relates or to an authorised person (Ref: section 45A of the Act).
- 7.16 The Applicant keeps a record or copy of a player activity statement made available by the club [whether or not provided under section 45(4) of the Act] (Ref: clause 43 of the Regulation).
- 7.17 The Applicant always makes available to the patrons of its club premises information as to the name and contact details of a problem gambling counselling service made available by or through a service provider (Ref: clause 44(2) of the Regulation).
- 7.18 The Applicant provides information as to the name and contact details of a problem gambling counselling service made available by or through a service provider to each person who is a participant in a self-exclusion scheme conducted by the Applicant under section 49 of the Act at the time the participant undertakes to be part of the scheme or as soon as practicable after that time and to any other person whenever requested to do so (Ref: clause 44(3) of the Regulation).
- 7.19 The Applicant displays a prescribed notice concerning the availability of a problem gambling counselling service and a self-exclusion scheme where approved gaming machines are located (Ref: clause 44(4) of the Regulation).
- 7.20 The Applicant ensures that the notice referred to in 7.19 contains (a) the name and contact details of the Applicant's problem gambling counselling service, (b) a statement advising patrons that a self-exclusion scheme is available on the club premises for the benefit of patrons who wish to be prevented from entering or remaining in any nominated area of the club premises for the purposes of assisting patrons to control their gambling, and (c) the name and contact details of a person or body who is able to assist patrons with becoming participants in a self-exclusion scheme conducted on the club premises (Ref: clause 44(5) of the Regulation).

- 7.21 The Applicant, or an employee of the Applicant, does not and will not refuse a request by the participant (as referred to in section 49 of the Act) to enter into an arrangement under that section, which requires the Applicant to:
- (a) accept a request by the participant (as referred to in section 49 of the Act) to enter into an arrangement under that section,
 - (b) ensure that the participant gives a written and signed undertaking that the participant will not gamble on the club premises for a period specified in the undertaking,
 - (c) give the participant an opportunity to seek independent legal or other professional advice at the participant's own expense as to the meaning and effect of the undertaking before it is given,
 - (d) ensure the participant is provided with written information outlining the name and contact details of the problem gambling counselling service referred to in clause 44(2),
 - (e) ensure that responsible persons (within the meaning of section 49 of the Act) for the club can readily identify the participant, whether by means of access to a recent photograph of the participant or otherwise,
 - (f) prevent the participant from withdrawing from the scheme within 6 months after requesting participation in the scheme.
- (Ref: section 49 of the Act and clause 45 of the Regulation).
- 7.22 The Applicant has adopted prescribed arrangements with ClubSafe for problem gambling counselling services to be made available to the patrons of the club premises (Ref: section 46 of the Act).
- 7.23 The Applicant displays gambling contact cards in a card holder that is securely attached to each bank of approved gaming machines. The gambling contact cards are positioned to enable a person to clearly see them while playing a gaming machine that is part of the bank of gaming machines or when approaching the bank of gaming machines (Ref: clause 46 of the Regulation).
- 7.24 The Applicant will not offer or supply, or cause or permit to be offered or supplied, any free or discounted liquor as an inducement to play, or to play frequently, approved gaming machines in the club premises, or offer, or cause or permit to be offered, free credits to players, or as an inducement to persons to become players, of approved gaming machines on the Venue's premises (Ref: clause 47 of the Regulation).
- 7.25 The Applicant conspicuously displays a notice stating that minors are not permitted in the gaming machine areas of the Venue in compliance with clause 52 of the Liquor Regulation 2018 (Ref: clause 48 of the Regulation).
- 7.26 The Applicant ensures that link progressive jackpot prize monitors are not located in any area of the club premises other than in a 'bar area' within the meaning of the Liquor Act 2007 (Ref: clauses 49 and 79 of the Regulation).
- 7.27 The Applicant ensures that the identity of a winner of a gaming machine prize exceeding \$1,000 is not published if the prizewinner notifies the Applicant in writing at the time the prize is claimed that he/she does not wish to be identified as the prizewinner (Ref: clause 50 of the Regulation).
- 7.28 The Applicant ensures that any employee of the Applicant involved in gaming machines and the Applicant's secretary comply with the requirement to produce their recognised competency card to a police officer or inspector for inspection (Ref: clause 56 of the Regulation).
- 7.29 The Applicant will not offer or provide a promotional prize: (a) in the form of cash, or (b) that exceeds \$1,000 in value, or (c) that is indecent or offensive, or (d) that can be exchanged for cash, or permit any bonus or reward points accumulated under a player reward scheme to be redeemed for cash (Ref: section 45 of the Act).

- 7.30 The Applicant ensures that no person under the age of 18 years operates an approved gaming machine (Ref: section 51 of the Act).
- 7.31 The Applicant takes all reasonable steps to ensure that no person under the age of 18 years enters a gaming machine area and, if a person under the age of 18 years does enter a gaming machine area, the person is immediately removed from that area (Ref: section 52 of the Act).

The Applicant adopts the following non-mandatory initiatives to enhance its responsible gambling policies –

- 7.32 Despite clause 25 of the Regulation, the Applicant does not and will not permit the cashing of cheques on the Venue's premises.
- 7.33 Despite clause 47 of the Regulation, the Applicant does not and will not provide free liquor to any member or guest on the Venue's premises.
- 7.34 Despite clause 47 of the Regulation, the Applicant does not and will not provide extreme discounting (e.g., discounts of greater than 50%) of liquor to any member or guest on the Venue's premises.
- 7.35 Despite clause 47 of the Regulation, the Applicant does not and will not provide liquor purchased at a gaming machine with loyalty reward points to any member on the Venue's premises.
- 7.36 Despite clause 50 of the Regulation, the Applicant does not and will not publish the identity of any gaming machine prizewinner.
- 7.37 The Applicant's loyalty rewards program does not discriminate between gaming machine players by way of a hierarchy of tiered rewards/player rankings and does not operate any 'player account' functionality.
- 7.38 As a further means to prohibit minors' accessing the gaming machine area as required by section 52 of the Act, the sole entrance to the gaming machine area is accessible only through an adjacent part of the Venue's premises that is not subject to a non-restricted area authorisation for the purposes of the Registered Clubs Act 1976.
- 7.39 The Applicant ensures that the Venue's gaming machines are in areas that do not attract the attention of members of the public and they are not visible to persons who are outside the Venue's premises.
- 7.40 Every gaming machine displays a clock, which is set at approximately the correct time of day.
- 7.41 The Applicant ensures that all members of the Venue's management and staff hold a Responsible Conduct of Gambling certification, despite the legislation requiring the certification only for persons engaged in the administration of the club or in the management of approved gaming machines on the Venue's premises pursuant to section 47 of the Act.
- 7.42 For every gaming machine prizewinning cheque issued, the Applicant examines the circumstances surrounding the payment of the cheque to ensure that the prize was awarded from legitimate gaming machine play substantiating that the prize was won on machines (to assist AML/CTF legislation compliance).
- 7.43 The Applicant does not permit redemption of loyalty points for issue of EFTPOS/CREDIT cards.
- 7.44 The Applicant does not offer or provide promotional prizes in the form of bill payments for utilities costs, rent payments or mortgage repayments.
- 7.45 The Applicant does not offer tobacco products as a promotional prize for gaming machine play.

8. LOCAL HOUSING STRATEGY

8.1 SUMMARY

The NSW Department of Planning, Industry and Environment's local housing strategies are detailed implementation plans that show where and how new homes can be developed in each of the 33 local government areas in Greater Sydney. These strategies enable councils to align the vision for their local area with the housing objectives and targets established for Sydney with the NSW Government's Greater Sydney Region Plan. These local housing strategies were expected to be implemented by councils through updates to their Local Environment Plans.

On 29th September 2020, Campbelltown City Council endorsed its Local Housing Strategy under its Planning Policy which includes the relevant strategic and statutory planning policies and studies to housing in the Campbelltown LGA and highlights key considerations for the Local Housing Strategy. The Region Plan sets the vision for the metropolis of three cities: Western Parkland City, Central River City and Eastern Harbour City. Campbelltown is in the Western Parkland City.

The population of the Western Parkland City is projected to grow from 740,000 in 2016 to 1.1 million by 2036. The Region Plan states: "Councils are to investigate opportunities for supply and a diversity of housing particularly around centres to create more walkable neighbourhoods. For councils, the main tool for understanding the need and planning for housing and infrastructure delivery is housing strategies. Council housing strategies will need to address the 0–5 and 6–10 year local (when agreed) or district housing targets as well as 20-year strategic district targets outlined in this Plan."

*The Local Housing Strategy is required to align with the strategic intent of the Region Plan and assist in implementing the objectives. The vision for the Western Parkland City highlights the Campbelltown-Macarthur centre as a metropolitan cluster and the Glenfield to Macarthur corridor as an opportunity for urban renewal. The Western Sydney Airport is envisioned to be the primary driver of growth in the region. The Greater Macarthur Growth area is identified as a region to deliver new communities such as **Menangle Park**, Mount Gilead and Wilton.*

According to the Western City District Plan, Campbelltown LGA is expected to see a significant growth in school aged children with an additional 13,541 student residents by 2036. This is indicative of the family character of the Campbelltown LGA. The District Plan also sets a 0-5 year housing target of 6,800 additional dwellings for Campbelltown LGA by 2021.³

In 2018, the NSW Department of Planning, Industry and Environment established 'Greater Macarthur 2040' - an Interim Plan for the Greater Macarthur Growth Area which sets out the strategic planning framework for the Growth Area.

***Greater Macarthur 2040** is a land use and infrastructure implementation plan to set a vision for the Greater Macarthur Growth Area as it develops and changes. The plan sets a long-term vision and provides a framework for the future of the Glenfield to Macarthur urban renewal corridor and the land release areas from **Menangle Park** to Appin.⁴*

³ Source: Campbelltown City Council Local Housing Strategy 29/9/2020.

⁴ Source: NSW Department of Planning, Industry and Environment website

The relevant structure plans include –

- Transport-oriented development in both urban renewal and land release precincts
- Homes in a variety of forms to meet the needs of people of different ages and incomes
- A highly accessible transport corridor connecting Campbelltown-Macarthur, Gilead, Appin and Douglas Park
 Three new east-west connections to the Hume Motorway to support the delivery of the Growth Area in sectors Public open space and amenities for new communities
- Walkable neighbourhoods for all age groups
- Cycle paths connecting neighbourhoods with public transport, jobs, education and open space
- Economic development opportunities through an economically strong Campbelltown-Macarthur with new centres at Glenfield, **Menangle Park**, Mount Gilead and Appin (noting Appin is outside of the Campbelltown LGA).

Greater Macarthur 2040 Greenfield Areas		
Location	Estimated Dwelling capacity	Current status
Menangle Park	4,000	Menangle Park Release area was rezoned in November 2017 to allow 3,400 dwellings. A planning proposal for 507ha is before DPIE for the Menangle Park Villa Holdings and Dahua Group properties to increase the dwelling yield on that parcel to 1,850 dwellings.

The new land release precincts will deliver low to medium density homes and employment. The plan highlights **Menangle Park** to deliver 4,000 new homes and Mount Gilead to deliver 15,000 new homes within the Campbelltown LGA.³

Greater Macarthur 2040 proposes to:

- Rezone and release land for urban development
- Deliver around 4,000 new homes
- Create a new town centre providing local retail and commercial services

Profile of Menangle Park	
Characteristics	Menangle Park urban area is to the east of the railway station with the Menangle Park Paceway harness racing facility and training tracks to the west. Beyond the paceway is the Nepean River running north south. Menangle Park Release area was rezoned in November 2017 to allow 3,400 dwellings. Since then, various landowners have submitted DAs for subdivision, infrastructure and marketing works. A development contribution has recently been adopted and applies to the area. A planning proposal for 507ha is before DPIE for the Menangle Park Villa Holdings and Dahua Group properties to increase the dwelling yield on that parcel to 1,850 dwellings and 2,700 jobs. The Planning Proposal seeks to amend planning controls to expand and rationalise current urban zonings, realign some existing zones, introduce the R4 High Density zone, relocate the B2 Local Centre zone, introduce a B1 Neighbourhood Centre zone and zone two critically endangered communities for conservation.

³ Source: Campbelltown City Council Local Housing Strategy 29/9/2020.

Profile of Menangle Park (continued)	
Predominant housing type	Primarily the housing in Menangle Park is large lot residential with small hobby farms or grazing paddocks for horses and smaller working animals. The planned growth for Menangle Park is to the east of the existing residential area.
Lots size	The residential lots in this area are generally between 7,000 m ² and 1 ha and around 800 m ² around the centre at Cummins Road. Minimum lot size in the residential area is generally 420 m ² and 300 m ² at the centre.
Estimated dwelling potential	The Greater Macarthur 2040 plan states Menangle Park precinct has potential for 4,000 new homes.
Existing facilities and services	<ul style="list-style-type: none"> • 1 childcare centre • Menangle Park Paceway
Frequency of peak hour train services	The station is on the Southern Highlands Line, trains depart approximately every 30 to 60 minutes.
Planned infrastructure	<ul style="list-style-type: none"> • New town centre with local retail and commercial services • Primary school • Road works • Drainage works • Bioretention (wetlands) • Local and district open space and playing fields • Community Centre • Community facility • Out of school hours care
Development pipeline	The development pipeline is largely represented by the Menangle Park planning proposal (1,850 dwellings) and should be reviewed pending the outcome of the proposal.
Housing prices	<ul style="list-style-type: none"> • Lots from \$388,000 • Land and house packages starting at \$657,000
Suited for Affordable housing contributions scheme	Subject to feasibility testing, Menangle Park could present an opportunity to capture much needed affordable housing as a developer contribution. Affordable dwellings dedicated in kind would ideally be located near a centre with access to public transport.
Suggested development timeframe	Ongoing

³ Source: Campbelltown City Council Local Housing Strategy 29/9/2020.

8.2 RESIDENTIAL DEVELOPMENTS

Dahua Group's Development

The Dahua Group Australia has plans for a premium new master planned community located at Menangle Park in Sydney's thriving South West corridor. When completed, Menangle Park will have over 4,000 homesites, offering residents the advantages of tranquil suburban living and close proximity to Campbelltown, Wollongong, Sydney CBD and Macarthur Square. Resident of Menangle Park will enjoy 41 hectares of planned open spaces, including local parks, sporting fields and cycle paths; a planned town centre with retail and dining, on-site primary and childcare facilities, close proximity to excellent private and state schools, and just a 5-minute walk to Menangle Park train station. ⁵

⁵ Source: Dahua Group Australia website.

The following aerial representation of the Dahua Group's proposed new development area shows the Venue positioned on the border of the development.

Aerial view of Dahua Group's proposed new development area for Menangle Park



Source: Dahua Group Australia website.

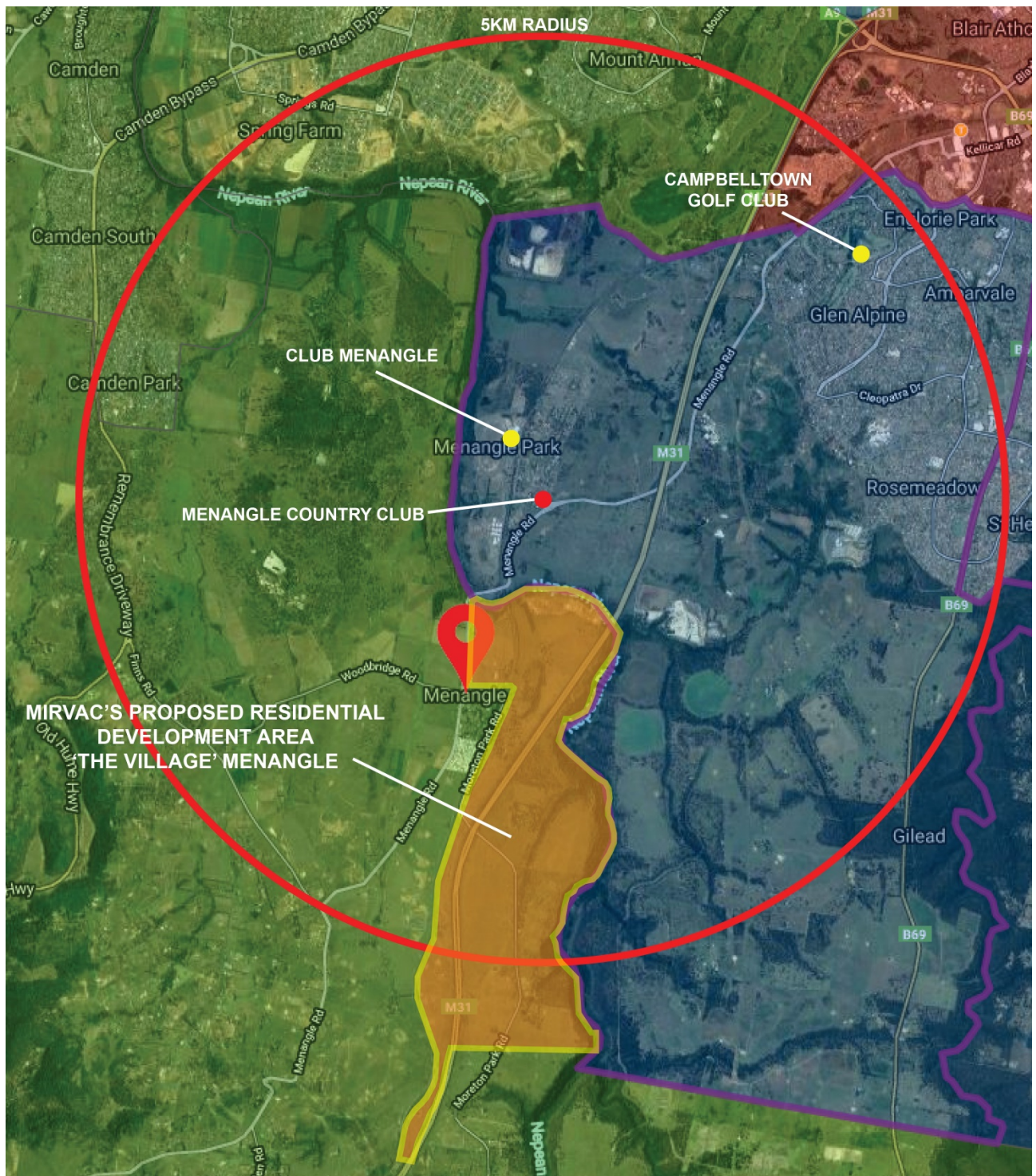
Mirvac Group's Development

Within 5km south of the Venue the property group Mirvac is developing a residential housing estate known as 'The Village' in Menangle.

On 21 November 2016, the Greater Sydney Commission (GSC) released the Draft District Plans which aim to guide the future sustainable growth of the City through to 2036. In addition to this, a Draft Amendment to the Sydney Metropolitan Plan, "A Plan for Growing Sydney" has also been released titled "Towards our Greater Sydney 2056". The GSC is responsible for metropolitan planning between State and local government thus, the role of the draft District Plans will be essential in setting the guiding principles for further growth for Greater Sydney. The District Plans are also crucial in setting the criteria for the "strategic merit test" for pre-Gateway Reviews of Planning Proposals, which now rely on the land being identified in key strategic documents to enable the progression to a Gateway review of a Planning Proposal. This submission relates to the Draft South West District Plan and "Towards our Greater Sydney 2056". As a key strategic document, the South West District Plan must give clear, unambiguous messages supporting the location for the delivery of future housing to satisfy market demand and affordability in an area where the new Western Sydney Airport will generate significant demand for further urban release areas. Mirvac has secured an interest in a large site which was included in the area under exploration as part of the Macarthur South Investigation Area (MSIA) and outlined in "A Plan for Growing Sydney". It is immediately adjacent to the Mount Gilead Release and is benefitted by having direct frontage to the Hume Highway and the Menangle Train Station within the land. Whilst the released priority growth area did not include Mirvac's landholdings due to heritage, servicing and coal mining constraints, Mirvac has provided additional information which resolve these outstanding issues and has made a submission to the Department of Planning and Environment to add this land to the area. ⁶

Mirvac has secured development rights to stages 1 to 3 of a site in Menangle covering approximately 577 hectares in total (as seen in Figure 1) and the potential to deliver 5,350 residential dwellings. The land is located to the south of Campbelltown within the Menangle and Douglas Park Precinct and is approximately 70km to the southwest of the Sydney CBD. It has several kilometres of motorway frontage along the M5 and the Menangle Train Station is located within the site providing rail services to the City in just over an hour.⁶

Figure 1



⁶ Source: GLN submission to the Greater Sydney Commission on the Draft South West District Plan.

9. DEMOGRAPHIC DETAILS

9.1 The following data shows SEIFA and related demographic information for *Rosemeadow-Glen Alpine* SA2.

Rosemeadow - Glen Alpine SA2 (SEIFA rankings of relative disadvantage on a Quintile basis = 2)

SA2 Band	GMT	Population	GMT density (GMT per capita)	Median weekly household income	Median monthly mortgage costs	Median weekly rent	Ave. MV per dwelling
2	108	20,880	193.3	\$1,533	\$1,741	\$350	1.9
Population Age ≤ 19 years		Population Age 20 – 50 years		Population Age > 50 years	Male/Female Ratio		Social Marital Status (15 years +) Reg. Married/De Facto/Not Married
28.8%		39.5%		31.7%	48.6% / 51.4%		47.2% / 9.1% / 43.7%
Common Ancestries Australian/English/Irish /Other or Undeclared				Highest Education Level (15 years +) Year 12/Cert. III or IV/Diploma /Other or Undeclared		Education Inst’n. Attended (32.2%) Primary/Secondary/Tertiary /Other or Undeclared	
24.1% / 22.9% / 6.1% / 46.9%				17.6% / 18.0% / 8.5%		9.47% / 7.37% / 5.54% / 9.82%	
Countries of Birth (Residents) Australia/England/Other or Undeclared				Countries of Birth (Parents) Australia/England/Other or Undeclared		Employment Status (15 years +) Full-time/Part-Time/Away from Work/Unemployed	
67.7% / 2.7% / 29.6%				50.35% / 4.85% / 44.8%		60.8% / 26.8% / 4.8%/ 7.6%	
Occupation (15 years +) Admin./Professional/Trade/Community/Machine Operators & Drivers/Sales/Labourer/Managers				Employment Industries (15 years +) Hospitals/Grocery Stores/Takeaway Food /Road & Freight/Primary Education /Other or Undeclared		Housing Tenure Owned Outright/Owned(Mortgaged)/Rented /Other or Undeclared	
16.2% / 14.5% / 13.9% / 11.0% 11.0% / 10.7% / 10.5% / 9.9%				3.7% / 3.0% / 2.8% / 2.3% / 2.0% 86.2%		25.5% / 40.0% / 30.7% / 3.8%	
Household Composition Families/Single Person/Groups				Household Gross Weekly Income Less than \$650/More than \$3,000		Dwelling Structure Separate House/Semi, Terrace, Townhouse /Flat or Apartment/ Other or Undeclared	
83.9% / 14.1% / 2.0%				16.4% / 15.9%		86.3% / 10.0% / 3.5% / 0.2%	

(Source: Australian Bureau of Statistics - 2016 Census)

9.2 The following data shows SEIFA and related demographic information for SA2s within 5 km of the Venue.

Bradbury - Wedderburn SA2 (SEIFA rankings of relative disadvantage on a Quintile basis = 1)

SA2 Band	GMT	Population	GMT density (GMT per capita)	Median weekly household income	Median monthly mortgage costs	Median weekly rent	Ave. MV per dwelling
2	45	18,963	421.4	\$1,354	\$1,777	\$330	1.7
Population Age ≤ 19 years		Population Age 20 – 50 years		Population Age > 50 years	Male/Female Ratio	Social Marital Status (15 years +) Reg. Married/De Facto/Not Married	
30.7%		40.8%		28.5%	48.4% / 51.6%	41.6% / 10.8% / 47.6%	
Common Ancestries Australian/English/Irish /Other or Undeclared			Highest Education Level (15 years +) Year 12/Cert. III or IV/Diploma /Other or Undeclared			Education Inst'n. Attended (32.1%) Primary/Secondary/Tertiary /Other or Undeclared	
27.0% / 24.5% / 6.9% / 41.6%			16.6% / 19.4% / 7.9%			9.98% / 7.22% / 5.14% / 9.76%	
Countries of Birth (Residents) Australia/England/Other or Undeclared			Countries of Birth (Parents) Australia/England/Other or Undeclared			Employment Status (15 years +) Full-time/Part-Time/Away from Work/Unemployed	
72.5% / 2.9% / 24.6%			56.7% / 5.2% / 38.1%			60.0% / 26.3% / 4.8% / 8.9%	
Occupation (15 years +) Admin./Professional/Trade/Community/Machine Operators & Drivers/Sales/Labourer/Managers			Employment Industries (15 years +) Hospitals/Grocery Stores/Takeaway Food /Road & Freight/Social Services /Other or Undeclared			Housing Tenure Owned Outright/Owned(Mortgaged)/Rented /Other or Undeclared	
15.1% / 13.0% / 15.1% / 12.4% 12.7% / 9.8% / 11.8% / 7.9%			3.7% / 3.2% / 2.7% / 2.4% / 2.6% / 85.4%			21.8% / 36.6% / 38.4% / 3.2%	
Household Composition Families/Single Person/Groups			Household Gross Weekly Income Less than \$650/More than \$3,000			Dwelling Structure Separate House/Semi, Terrace, Townhouse /Flat or Apartment/ Other or Undeclared	
78.9% / 18.7% / 2.4%			20.0% / 10.0%			86.2% / 11.5% / 2.0% / 0.3%	

(Source: Australian Bureau of Statistics - 2016 Census)

Campbelltown - Woodbine SA2 (SEIFA rankings of relative disadvantage on a Quintile basis = 2)

SA2 Band	GMT	Population	GMT density (GMT per capita)	Median weekly household income	Median monthly mortgage costs	Median weekly rent	Ave. MV per dwelling
3	866	18,192	21.0	\$1,345	\$1,825	\$370	1.6
Population Age ≤ 19 years		Population Age 20 – 50 years		Population Age > 50 years	Male/Female Ratio		Social Marital Status (15 years +) Reg. Married/De Facto/Not Married
25.1%		43.2%		31.7%	49.4% / 50.6%		45.1% / 9.3% / 45.6%
Common Ancestries Australian/English/Irish /Other or Undeclared				Highest Education Level (15 years +) Year 12/Cert. III or IV/Diploma /Other or Undeclared		Education Inst'n. Attended (30.5%) Primary/Secondary/Tertiary /Other or Undeclared	
20.7% / 20.8% / 6.2% / 52.3%				17.7% / 15.8% / 8.7%		8.02% / 5.83% / 7.11% / 9.54%	
Countries of Birth (Residents) Australia/Philippines/Other or Undeclared				Countries of Birth (Parents) Australia/Philippines/Other or Undeclared		Employment Status (15 years +) Full-time/Part-Time/Away from Work/Unemployed	
60.5% / 3.6% / 35.9%				42.95% / 4.5% / 52.55%		61.4% / 26.1% / 4.7% / 7.8%	
Occupation (15 years +) Admin./Professional/Trade/Community/Machine Operators & Drivers/Sales/Labourer/Managers				Employment Industries (15 years +) Hospitals/Grocery Stores/Cafes & Restaurants /Aged Care/Social Services /Other or Undeclared		Housing Tenure Owned Outright/Owned(Mortgaged)/Rented /Other or Undeclared	
14.9% / 17.7% / 12.8% / 11.0% 11.3% / 10.2% / 11.2% / 8.8%				5.2% / 3.2% / 2.0% / 2.0% / 2.2% / 85.4%		24.0% / 30.9% / 38.9% / 6.2%	
Household Composition Families/Single Person/Groups				Household Gross Weekly Income Less than \$650/More than \$3,000		Dwelling Structure Separate House/Semi, Terrace, Townhouse /Flat or Apartment/ Other or Undeclared	
70.4% / 26.4% / 3.2%				21.6% / 11.7%		65.1% / 14.5% / 19.4% / 1.0%	

(Source: Australian Bureau of Statistics - 2016 Census)

Douglas Park - Appin SA2 (SEIFA rankings of relative disadvantage on a Quintile basis = 5)

SA2 Band	GMT	Population	GMT density (GMT per capita)	Median weekly household income	Median monthly mortgage costs	Median weekly rent	Ave. MV per dwelling
1	36	9,626	267.4	\$2,170	\$2,383	\$400	2.5
Population Age <= 19 years		Population Age 20 – 50 years	Population Age > 50 years	Male/Female Ratio		Social Marital Status (15 years +) Reg. Married/De Facto/Not Married	
29.3%		39.8%	30.9%	50.7% / 49.3%		59.5% / 9.9% / 30.5%	
Common Ancestries Australian/English/Irish /Other or Undeclared			Highest Education Level (15 years +) Year 12/Cert. III or IV/Diploma /Other or Undeclared		Education Inst'n. Attended (29.8%) Primary/Secondary/Tertiary /Other or Undeclared		
34.1% / 28.5% / 7.6% / 29.8%			12.6% / 24.8% / 10.8%		10.07% / 6.97% / 4.77% / 7.99%		
Countries of Birth (Residents) Australia/England/Other or Undeclared			Countries of Birth (Parents) Australia/England/Other or Undeclared		Employment Status (15 years +) Full-time/Part-Time/Away from Work/Unemployed		
83.2% / 3.7% / 13.1%			70.3% / 6.85% / 22.85%		64.4% / 28.0% / 4.8% / 2.8%		
Occupation (15 years +) Admin./Professional/Trade/Community/Machine Operators & Drivers/Sales/Labourer/Managers			Employment Industries (15 years +) Hospitals/Grocery Stores/Secondary Education /Road & Freight/Primary Education /Other or Undeclared		Housing Tenure Owned Outright/Owned(Mortgaged)/Rented /Other or Undeclared		
16.0% / 16.8% / 18.3% / 9.9% 8.3% / 8.5% / 7.1% / 13.6%			2.4% / 2.7% / 2.7% / 2.7% / 3.7% / 85.8%		29.8% / 55.1% / 11.6% / 3.5%		
Household Composition Families/Single Person/Groups			Household Gross Weekly Income Less than \$650/More than \$3,000		Dwelling Structure Separate House/Semi, Terrace, Townhouse /Flat or Apartment/ Other or Undeclared		
87.0% / 11.6% / 1.4%			9.2% / 27.4%		94.0% / 4.3% / 0.7% / 1.0%		

(Source: Australian Bureau of Statistics - 2016 Census)

Mount Annan - Currans Hill SA2 (SEIFA rankings of relative disadvantage on a Quintile basis = 4)

SA2 Band	GMT	Population	GMT density (GMT per capita)	Median weekly household income	Median monthly mortgage costs	Median weekly rent	Ave. MV per dwelling
1	30	28,575	952.5	\$2,076	\$2,167	\$450	2.2
Population Age <= 19 years		Population Age 20 – 50 years	Population Age > 50 years	Male/Female Ratio	Social Marital Status (15 years +) Reg. Married/De Facto/Not Married		
32.9%		45.2%	21.9%	48.8% / 51.2%	53.3% / 10.4% / 36.3%		
Common Ancestries Australian/English/Irish /Other or Undeclared			Highest Education Level (15 years +) Year 12/Cert. III or IV/Diploma /Other or Undeclared		Education Inst'n. Attended (32.0%) Primary/Secondary/Tertiary /Other or Undeclared		
28.6% / 26.6% / 7.8% / 37.0%			16.3% / 21.6% / 10.7%		11.23% / 8.29% / 5.76% / 6.72%		
Countries of Birth (Residents) Australia/England/Other or Undeclared			Countries of Birth (Parents) Australia/England/Other or Undeclared		Employment Status (15 years +) Full-time/Part-Time/Away from Work /Unemployed		
79.8% / 3.0% / 17.2%			63.5% / 5.8% / 30.7%		64.5% / 26.2% / 4.8% / 4.5%		
Occupation (15 years +) Admin./Professional/Trade/Community/Machine Operators & Drivers/Sales/Labourer/Managers			Employment Industries (15 years +) Hospitals/Grocery Stores/Takeaway Food /Road & Freight/Primary Education /Other or Undeclared		Housing Tenure Owned Outright/Owned(Mortgaged)/Rented /Other or Undeclared		
17.3% / 16.4% / 14.9% / 11.3% 8.7% / 10.3% / 8.1% / 11.3%			3.4% / 3.4% / 2.5% / 2.7% / 3.1% / 84.9%		18.6% / 58.4% / 21.4% / 1.6%		
Household Composition Families/Single Person/Groups			Household Gross Weekly Income Less than \$650/More than \$3,000		Dwelling Structure Separate House/Semi, Terrace, Townhouse /Flat or Apartment/ Other or Undeclared		
87.2% / 11.4% / 1.4%			8.1% / 22.3%		94.0% / 6.0% / 0% / 0%		

(Source: Australian Bureau of Statistics - 2016 Census)

	Population	Median Age	Families	Private Dwellings	Median weekly household income	Ave. MV per dwelling
Glen Alpine	4,559	40	1,323	1,379	\$350	2.5
Menangle Park	257	38	71	91	\$1,462	2.3
Menangle	1,150	50	304	386	\$1,521	2.4
Wedderburn	633	40	156	189	\$2,013	3
Rosemeadow	7,862	33	2,075	2,659	\$1,470	1.8
Ambarvale	7,374	32	1,989	2,534	\$1,287	1.7
Camden Park	2,238	34	603	658	\$2,776	2.6
Camden South	4,539	37	1,335	1,689	\$1,812	2.1
Englorie Park	416	31	112	157	\$1,552	1.4
Mount Annan	11,703	33	3,232	3,661	\$2,214	2.2
St. Helens Park	6,602	31	1,784	2,186	\$1,651	2
Spring Farm	4,307	30	1,239	1,560	\$2,145	2
Averages	3,904	39	1,060	1,306	\$1,585	2

Source: Australian Bureau of Statistics - 2016 Census

With the anticipated population increase and improvement in the socio-economic conditions in the *Rosemeadow - Glen Alpine* SA2 in coming years, it seems possible that the SA2 may in time become a Band 1 classification, like the nearby *Elderslie-Harrington Park* SA2 (see hereunder). It is unlikely that *Rosemeadow - Glen Alpine* SA2 will be re-classified until well after the ABS Census in 2026. As the new development areas mature, we submit that a GMT increase of 50 will not increase the density of gaming machines in the local statistical area in which the premises are situated to the extent that the classification of the area is affected.

Elderslie - Harrington Park SA2 (SEIFA rankings of relative disadvantage on a Quintile basis = 4)

SA2 Band	GMT	Population	GMT density (1 GMT per ? persons)	Median weekly household income	Median monthly mortgage costs	Median weekly rent	Ave. MV per dwelling
1	161	20,980	130.3	\$2,124	\$2,300	\$470	2.2

10. POSITIVE CONTRIBUTIONS TO THE LOCAL COMMUNITY

10.1 THE VENUE

The major positive contribution to the local community is the Venue itself which offers state-of-the-art amenities with dining, bar and entertainment services, formal functions facilities catering for up to 250 seated persons, substantial outdoor garden and recreation areas, several free-standing buildings capable of hosting unique and diverse entertainment and function services, historic Menangle House with heritage recognition, children's outdoor playground and play facility and children's in-club electronic games facility. It will also employ approximately 120 people, stimulate the economy during further construction and, most importantly, provide dedicated recreational areas in a community clearly lacking in social infrastructure.

10.2 FINANCIAL CONTRIBUTIONS TO THE RESPONSIBLE GAMBLING FUND

If the application is approved in full, the applicant will make the required contributions to the Responsible Gambling Fund over the next five (5) years. This contribution amount will be calculated in accordance with the formula shown in ILGA's 'Class 1 Local Impact Assessment Process Guidelines'. The current contribution rate is 15 percent of the club's current annual average gaming profit machine per machine multiplied by the proposed GMT increase (50) each year for the next 5 years.

While the Venue may be categorised as a relatively new club, it commenced limited trading in February 2020. The Venue experienced interrupted trading over the past 22 months. Excluding the periods that the Venue was closed through the Covid-19 lockdowns, the Venue has so far accumulated 459 days (almost 16 months) of active trading to 31st October 2021. Therefore, it is submitted that there has been sufficient gaming machine activity at the Venue to adopt assessment of an appropriate value of average annual profit per gaming machine, as set out in the following table and calculations.

Month	No. of Trading Days	Metered Profit
February 2020	22	\$42,601.46
March 2020	22	\$49,727.96
April 2020	-	-
May 2020	-	-
June 2020	30	\$22,613.18
July 2020	31	\$35,681.23
August 2020	31	\$27,591.50
September 2020	30	\$51,680.11
October 2020	31	\$58,085.19
November 2020	30	\$45,226.52
December 2020	31	\$56,494.31
January 2021	31	\$58,287.23
February 2021	28	\$40,334.18
March 2021	31	\$69,177.48
April 2021	30	\$46,618.81
May 2021	31	\$32,690.08
June 2021	26	\$57,140.12
July 2021	-	-
August 2021	-	-
September 2021	-	-
October 2021	21	\$94,085.00
Totals	456	\$788,034.36

Source: Data Monitoring Services Reports at www.maxgaming.com

By adopting a daily net metered profit average, the Venue's average annual profit per gaming machine before gaming machine tax is calculated as follows:

$$\frac{\$788,034.36}{\text{[Total Metered Profit]}} \div \frac{456}{\text{[Trading Days]}} \times \frac{365}{\text{[Days per Year]}} \div \frac{39}{\text{[No. of active machines]}} = \frac{\$16,173.67}{\text{[Ave. annual metered profit / machine]}}$$

Thus, the Venue's required total contribution to the Responsible Gambling Fund for an approved GMT increase of 50 is calculated as follows:

$$\frac{\$16,173.67}{\text{[Ave. annual metered profit / machine]}} \times \frac{15\%}{\text{[Contribution Rate]}} \times \frac{5}{\text{[No. of Years]}} \times \frac{50}{\text{[GMT increase]}} = \frac{\$606,512.61}{\text{[Total contribution to RGF]}}$$

As set out in ILGA's 'Class 1 Local Impact Assessment Process Guidelines', the Venue's annual contribution to the Responsible Gambling Fund over the 5-year period following approval of the GMT increase of 50 is shown as follows (rounded to \$610,000 for convenience):

<u>Year 1</u>	<u>Year 2</u>	<u>Year 3</u>	<u>Year 4</u>	<u>Year 5</u>
\$61,000	\$91,500	\$122,000	\$152,500	\$183,000
10%	15%	20%	25%	30%

10.3 NON-MANDATORY HARM MINIMISATION MEASURES

Sub-sections 7.32 to 7.45 inclusive herein state the Venue's harm minimisation measures which go above and beyond mandatory requirements.

10.4 CLUBGRANTS CONTRIBUTIONS

In the early stages of the Venue establishing its facilities and services in the new development area, gaming machine revenue has been relatively low compared to the average profits achieved by other clubs in the Campbelltown LGA, surrounding LGAs and the State. As such, the Venue is not yet required to make contributions through the CLUBGRANTS scheme. After some years of further establishment and population growth in the area, it is expected that the Venue's gaming machine revenues will increase. Thus, the Venue is likely to make mandatory contributions through the CLUBGRANTS scheme and additional contributions as business improves. In the foreseeable future, however, the Venue's fortunes in that regard are uncertain. Therefore, it is unknown if the Venue will be justified to seek offsets against its financial obligations to the Responsible Gambling Fund over the next 5 years as outlined in 10.2 above.

10.5 SUPPORT OF CAMPBELLTOWN CITY COUNCIL, THE RETURNED SERVICES LEAGUE AND THE BEERSHEBA MONUMENTS

The Applicant is a dedicated ongoing supporter and financial contributor to Campbelltown City Council and the R.S.L. movement for establishment and maintenance of the Beersheba monument situated near the Venue. The monument commemorates the Light Horse Regiments that trained at the Applicant's racecourse property over 100 years ago and participated in the Battle of Beersheba (Israel) in 1917 which resulted in the capture of the strategic town of Beersheba. Thirty-one brave Australians were killed and 36 were wounded in the battle which enabled the British Empire forces to break the Ottoman line near Gaza and advance into Palestine.

11. COMMUNITY CONSULTATION

The Applicant has complied with the community consultation requirements as evidenced by the Statutory Declaration executed by Bruce Christison, Chief Executive Officer of the Applicant (Annexure F).

12. CONCLUSION

We respectfully submit that this Class 1 LIA should be approved as the Applicant has demonstrated that -

- the Venue is situated in a Band 2 LSA,
- the Venue's licensed premises are situated in a new development area as defined by subsection (1) of section 37A of the Act,
- the new development area does not have the full benefit of the services and facilities of the kind provided by clubs,
- the gaming machine threshold increase to which the application relates is not more than 150, and
- the acquisition of a corresponding number of gaming machine entitlements in respect of those premises would not increase the density of gaming machines in the local statistical area in which the premises are situated to the extent that the classification of the area is affected,
- it complies with the requirements under the Act, Regulation and ILGA policies and guidelines,
- it has provided details of the Venue and the local community,
- gambling activities at the Venue will be conducted in a manner consistent with sound gambling harm minimisation principles and practices,
- the proposed increase in gaming machines for the Venue will provide a positive contribution to the community in which the Venue is situated,
- the Venue is not in the immediate vicinity of a school, place of public worship or hospital, and
- it has met the community consultation requirements and any community concerns arising out of the community consultation process will be appropriately addressed by the Applicant.

13. REQUEST FOR NO DISCOUNT TO THE GMT INCREASE SOUGHT

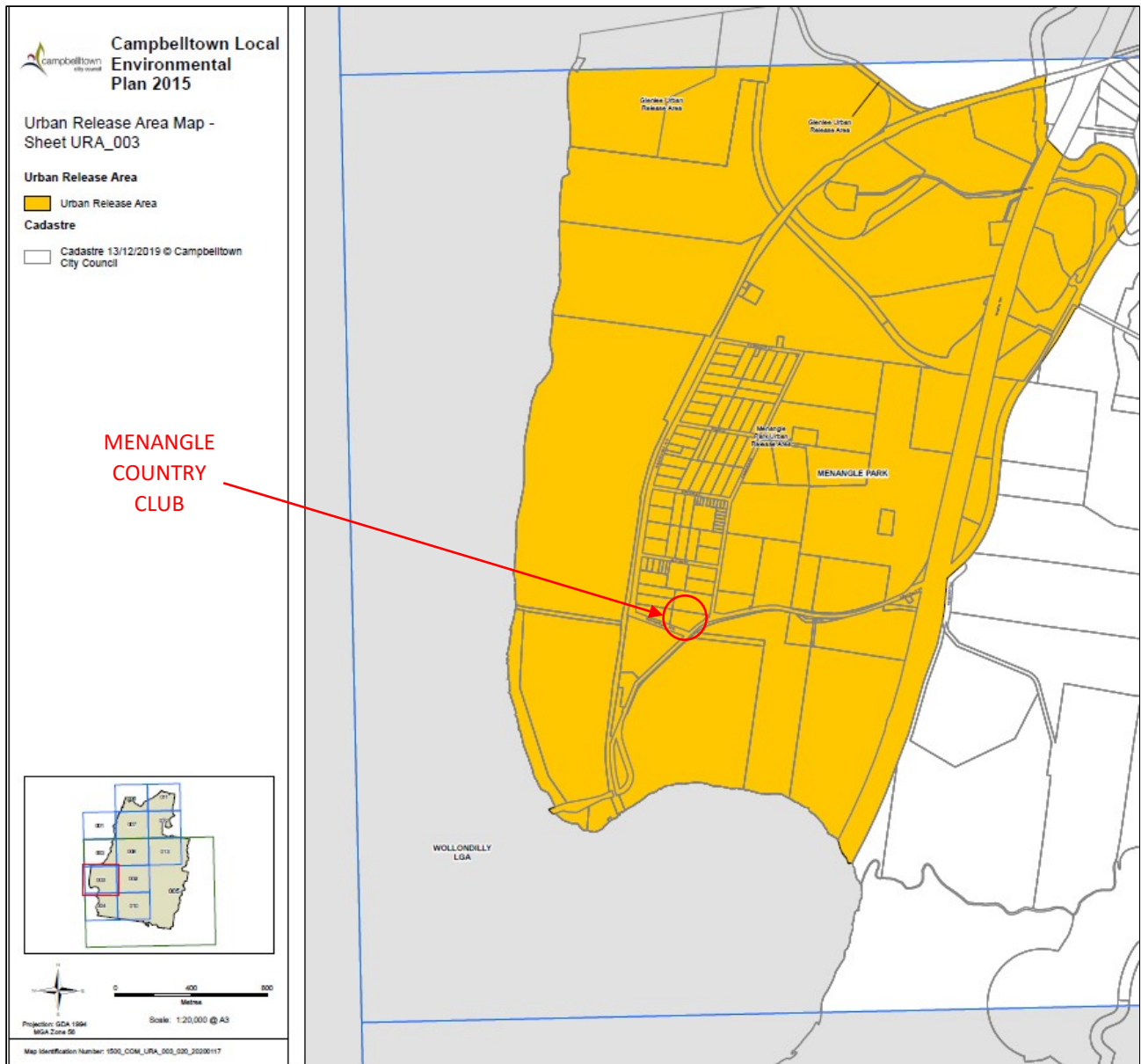
The Applicant notes, in respect of two 'new development area' applications lodged by Club Marconi for a proposed new Macarthur Community & Sports Club (2017) and by Moorebank Sports Club for a proposed new Gregory Hills Sports Club (2019), ILGA approved a GMT increase of 100 in lieu of the 150-increase sought. The reasons for those limited approvals are unknown but **the Applicant submits that the GMT increase of 50 now sought is balanced and commensurate with reasonable expectations of the Venue's requirements over the next 5 years.** Unlike the abovementioned applications, **the Applicant has chosen not to submit an ambit claim for a GMT increase of 150. Should ILGA approve of the application, the Applicant respectfully requests that ILGA not discount the increase of 50 sought.**

14. LATE-NIGHT GAMING APPLICATION - GL4026 GUIDELINE 16

The Venue's profit levels have been very low compared to the averages for clubs and hotels in the *Rosemeadow-Glen Alpine* SA2 and the Campbelltown LGA, which will continue for some time. The Venue has implemented several harm-minimisation measures that go above and beyond the minimum legislative requirements as listed in sub-sections 7.32 to 7.45 herein. In the early stages of development of the Venue and the 'new development area' the Venue has not yet made any community contributions to support harm minimisation services in its local community but intends to do so upon further establishment of the Venue and its facilities. Therefore, approval is respectfully sought for gaming machines to be operated beyond 2am, when necessary and justified.

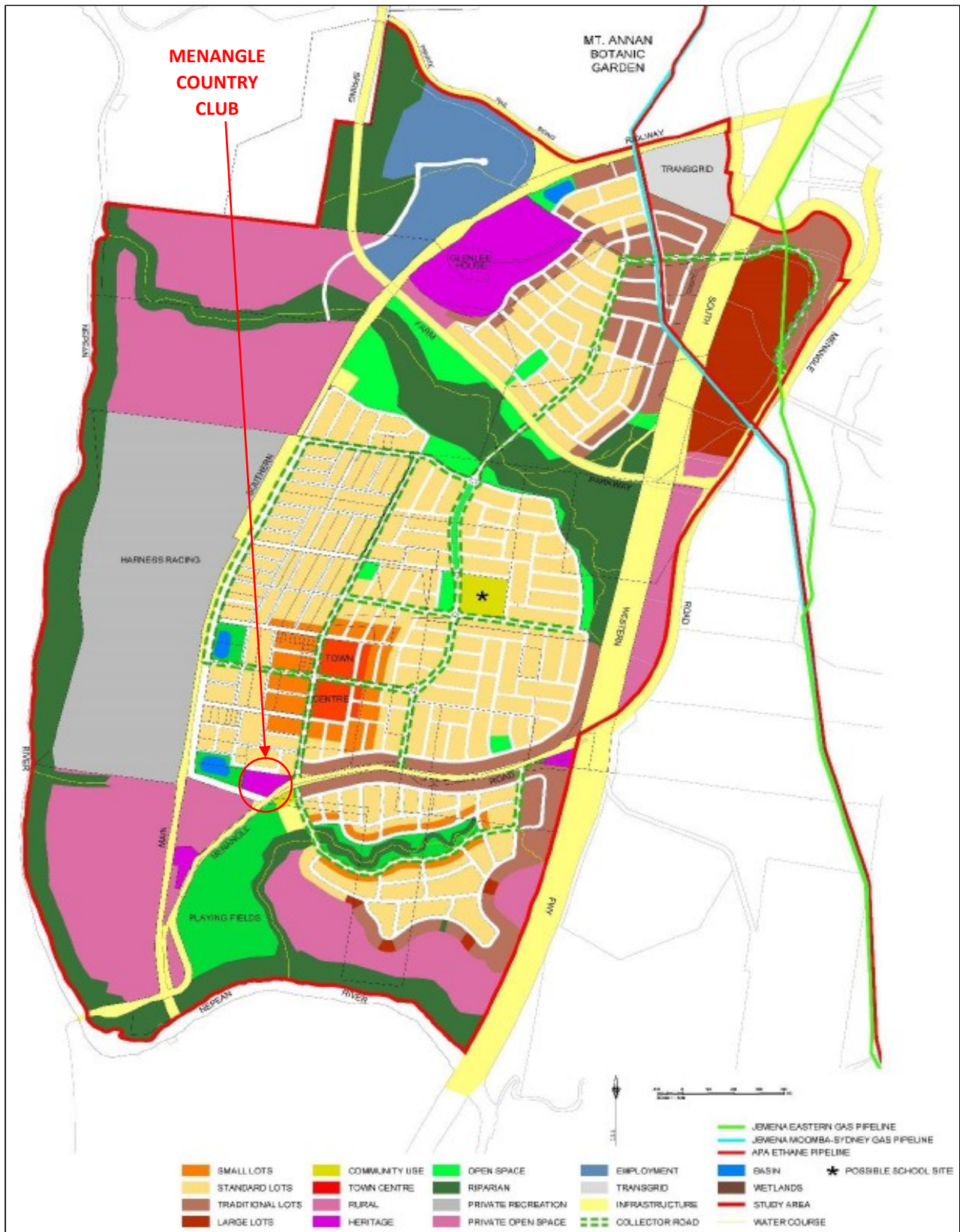
ANNEXURE A

The following Urban Release Area Map published by Campbelltown City Council verifies the area coloured yellow as an urban release area, which includes the relevant new development area planned by the Dahua Group.



Source: Campbelltown City Council

ANNEXURE B



Source: Campbelltown City Council Menangle Park Contributions Plan June 2020

[illegible]

ANNEXURE D

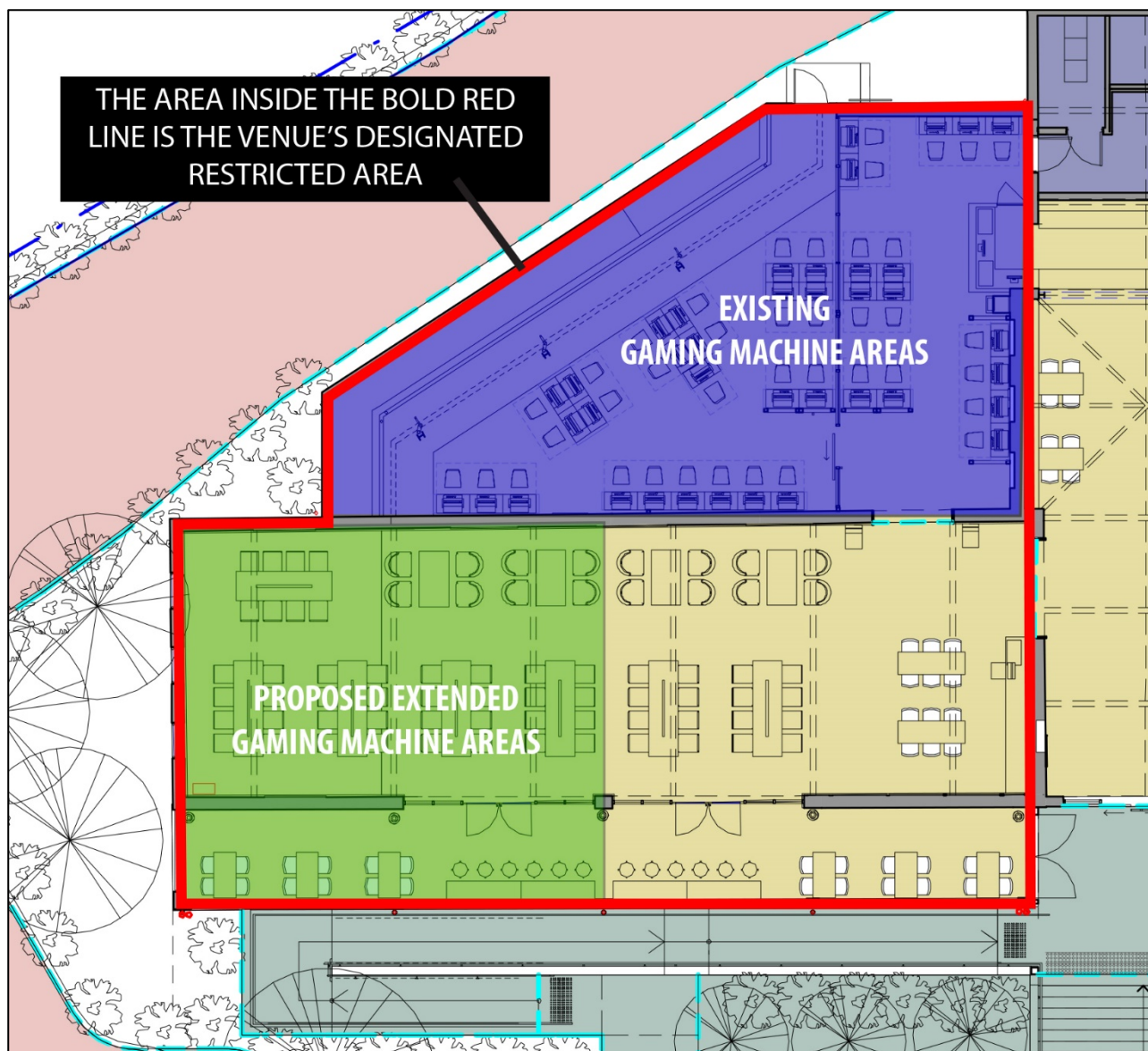


Source: Club Menangle website

ANNEXURE E

The plan below shows the existing gaming machine areas shaded blue and the proposed extended gaming machine areas shaded green.

The bold red line specifies the Venue's current restricted area.



ANNEXURE F

Statutory Declaration *OATHS ACT 1900, NSW, EIGHTH SCHEDULE*

I, Bruce Christison, Chief Executive Officer of New South Wales Harness Racing Club situated at Menangle Park Paceway, Racecourse Road, Menangle Park NSW 2563, do solemnly and sincerely declare that -

1. New South Wales Harness Racing Club is the Applicant for a gaming machine threshold increase of 50 in respect of its licensed club premises known as Menangle Country Club (Club Licence No. LIQC330019636).
2. Copies of the application and this Class 1 Local Impact Assessment were provided to Campbelltown City Council, 1 Art Gallery Road, Campbelltown 2560 on 30th November 2021.
3. Copies of the application and this Class 1 Local Impact Assessment were provided to the Campbelltown City Police Area Command, 65 Queen Street, Campbelltown 2560 on 30th November 2021.
4. The local health district, South Western Sydney Local Health District, Liverpool Hospital Eastern Campus, Corner of Lachlan and Hart Streets, Liverpool 2170 was notified on 30th November 2021 that the application and this Class 1 Local Impact Assessment have been lodged with the Independent Liquor & Gaming Authority and they may be inspected on the Liquor & Gaming NSW website.
5. The following organisations located in the Campbelltown LGA that receive funding from the Responsible Gambling Fund under the *Casino Control Act 1992* for the specific purpose of providing gambling-related counselling or treatment services were notified on 30th November 2021 that the application and this Class 1 Local Impact Assessment have been lodged with the Independent Liquor & Gaming Authority and they may be inspected on the Liquor & Gaming NSW website.
 - Macarthur Family & Youth Services, 16 King Street, Campbelltown 2560
 - Focus Connect, 3 Cordeaux Street, Campbelltown 2560
 - Gambling Treatment Clinic, 186 Queen Street, Campbelltown 2560
 - Macarthur Gateway Resource Services, 12 Browne Street, Campbelltown 2560
6. The following community service organisations listed by Campbelltown City Council engaged in the provision, in the local community, of services relating to welfare, emergency relief, financial assistance, Aboriginal health, Aboriginal legal assistance or gambling and addiction counselling or treatment were notified on 30th November 2021 that the application and this Class 1 Local Impact Assessment have been lodged with the Independent Liquor & Gaming Authority and they may be inspected on the Liquor & Gaming NSW website.

• Beyond Blue	• Beautiful Minds	• Ambarvale/Rosemeadow Men's Shed
• Lifeline	• Sane Australia	• Tharawal Aboriginal Corporation
• HeadsUp	• Reachout	• WILMA Women's Health Centre
• ACON	• Mac Fields Men's Shed	• Indigenous Women's Legal Line
• Headspace	• The Blackdog Institute	• Aboriginal Health & Medical Research Council of NSW
• MensLine	• Suicide Call Back Service	• National Aboriginal Community Controlled Health Org'n
• MindSpot	• Airds/Bradbury Men's Shed	

ANNEXURE F (continued)

Statutory Declaration
OATHS ACT 1900, NSW, EIGHTH SCHEDULE

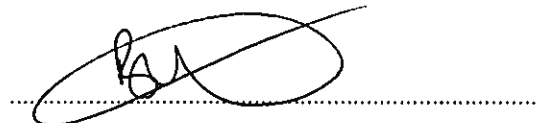
(Statutory declaration of Bruce Christison continued)

7. Each organisation referred to in paragraphs 4-6 inclusive above were advised that they may make a written submission to the Independent Liquor & Gaming Authority in relation to the application and the LIA within 60 days after the date notified on the Liquor & Gaming NSW website as the date on which the application was posted on that website.
8. On 30th November 2021, an advertisement was ordered with Australian Community Media for publication in the Campbelltown-Macarthur Advertiser, the local newspaper circulating in the area where the Venue is situated, on 1st December 2021. A notice was also placed in a conspicuous area outside the Venue on 30th November 2021. The advertisement and the notice –
- (a) state that the application has been made and that the LIA has been provided with the application, and
 - (b) explains the nature of the application, and
 - (c) advises that the application and the LIA may be inspected on the Liquor & Gaming NSW website, and
 - (d) advises that any person may make a submission to the Independent Liquor & Gaming Authority in relation to the application and the LIA within 60 days after the date notified on the Liquor & Gaming NSW website as the date on which the application was posted on that website.

and I make this solemn declaration conscientiously believing the same to be true, and by virtue of the provisions of the *Oaths Act 1900*.

Declared at: Menangle Park

on 30th November 2021



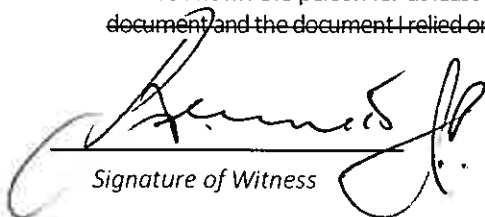
[signature of declarant]

in the presence of an authorised witness, who states:

I, Philip Charles Bennett, a Justice of the Peace - Registered No. 146073, certify the following matters concerning the making of this statutory declaration by the person who made it:

[* please cross out any text that does not apply]

1. ~~*I saw the face of the person~~ OR ~~*I did not see the face of the person because the person was wearing a face covering, but I am satisfied that the person had a special justification* for not removing the covering, and~~
2. ~~*I have known the person for at least 12 months~~ OR ~~*I have confirmed the person's identity using an identification document and the document I relied on was~~



Signature of Witness

Statement by Author

I, Philip Charles Bennett, Managing Director of Phil Bennett Consulting situated at 21 Foothills Terrace, Glenmore Park NSW 2745, state that -

1. I am the author of this Class 1 Local Impact Assessment ("LIA") attached hereto in respect of an application by New South Wales Harness Racing Club for a gaming machine threshold increase in respect of the registered club known as Menangle Country Club (Club Licence No. LIQC330019636).
2. In preparation of this LIA document, I have relied on information supplied by Liquor & Gaming NSW, New South Wales Harness Racing Club and various sources of information identified in this LIA document.
3. To the best of my knowledge and belief the information contained in the LIA document represents either an accurate re-statement of data and information obtained from the sources identified or represents an opinion formed honestly after consideration of the facts provided by those sources.



30th November 2021