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# Local Impact Assessment Class 1 Application 20-22 Camden Road, Campbelltown

**Campbelltown Catholic Club Ltd**  
June 2009



Campbelltown Catholic Club premises – view to entrance and CUBE entertainment venue

Prepared by:



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## EXECUTIVE SUMMARY

### 1. Introduction

I. This document is a Local Impact Assessment Class 1 to accompany a Threshold Increase Application (the "Application") made for approval of a 'low range' gaming machine threshold increase of 20 for Campbelltown Catholic Club Ltd (the "Applicant") at premises situated at 20-22 Camden Road, Campbelltown NSW (the "Venue") located in the Band 2 Local Government Area (the "LGA") of Campbelltown. The Applicant has operated at the Venue for more than 40 years and provides hospitality based recreational pursuits and community based enterprises for its members and their guests.

### 2. Responsible Gambling Measures

II. Chapter 2 of this Report details the mandatory and additional responsible service of gambling measures put in place by the Applicant at the Venue. The Applicant operates its gaming machine operations in strict accordance with Legislated and 'best-practice' interventions and initiatives modelled on its Responsible Service of Gambling House Policy (see Appendix 1). The Applicant has also implemented additional measures to ensure compliance with recent amendments to the Gaming Machines Act 2001 and associated Regulations. The Applicant is a member of ClubSafe, and has adopted its best practice guidelines and policies.

### 3. Local Community

III. Chapter 3 of this Report details the communities potentially affected by the approval of the Application. The Campbelltown LGA is the Local Government Area of the Venue. An area extending 5kms from the Venue has been identified as the Local Community. A map of the LGA and Local Community is included in Appendix 2 and 3 respectively.

### 4 Positive contribution

IV. Chapter 5 of this Report details the positive contribution resultant from approval of the Application to the Local Community. Positive contributions include additional state taxes, additional employment and CDSE contributions. The Applicant has an established relationship with the Local Community organisation, Youth Solutions. A sum of \$50,000 per annum for three years and thereafter contingent on the success of the program will be paid by the Applicant to this organisation. Youth Solutions aims to reduce drug and alcohol related harm among young people by forming a better understanding of patterns of consumption through research, educating young people on responsible behaviour and referring them where required to local services. The funding will allow Youth Solutions to continue to provide the '*Don't Be (a) Random*' drug and alcohol awareness program with the overall aim of ensuring young people (18-24) enjoy safe nights out without dangerous levels of alcohol consumption. There is a particular need in the Local Community for this service, evidenced by information provided by Youth Solutions, Campbelltown Council, OLGR and the Applicant itself detailed in this LIA. The Youth Solutions on-going funding will ensure the young population of the Local Community is adequately educated on the need to consume alcohol responsibly and in conjunction with the other benefits put forward in this LIA results in a positive contribution to the Local Community through approval of the Application.

### 5. Conclusion

V. Given the satisfaction of the requirements of the Act and Regulation through the conduct of gaming machine operation 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.

## **1 INTRODUCTION**

1.1 This Report is an LIA Class 1 to accompany the Application for Campbelltown Catholic Club Ltd (“the Applicant”) in the Band 2 Local Government Area for of ‘low range increase’ of 20 gaming machines. The Applicant is located at 20-22 Camden Road, Campbelltown and provides recreational services and community based enterprises for the residents of the Campbelltown LGA and its Local Community. The location of the Venue is identified and illustrated in Appendix 2 and has a total floor space of 9,910m<sup>2</sup> as shown by the layout plan of the Venue provided at Appendix 4.

### **1.2 Methodology**

1.3 In respect of LIAs relating to threshold increase applications, the LIA Guidelines provide that the Casino, Liquor and Gaming Control Authority (“the Authority”) can only approve an LIA where the LIA complies with the requirements of the [Gaming Machines] Act [2001] and the [Gaming Machines] Regulations [2008] (“the Legislation”) and demonstrates that gambling activities will be conducted in a responsible manner. The Guidelines further state that an LIA Class 1 must demonstrate that the proposed increase in gaming machines for the venue will provide a positive contribution towards the Local Community in which the venue is situated.

### **1.4 Applicant Details and History**

1.5 The Applicant was formed on the 8<sup>th</sup> July 1965 by 40 members of the local parish. The Applicant was founded with the intention of providing support for Catholic education, sport and cultural pursuits in the locality, whilst also being mindful of the community needs of the Campbelltown area. These objectives remain unaltered today.

### **1.6 Current Applicant Services, Facilities and Donations**

1.7 The Venue is currently comprised of lounge, entertainment, dining, fitness and function areas, as well as a ‘Kidzone’ for children aged 10 years and under. The facilities offered by the Applicant include Aquafit Fitness & Leisure Centre and The Cube Convention & Entertainment Centre, which holds Australian and international acts. The Applicant also offers accommodation at Rydges Campbelltown, a 116 room hotel, along with the facilities of Quondong, a heritage listed property owned by the Applicant and provided to Campbelltown City Council for use as a Visitor Information Centre. The Applicant makes donations to a number of organisations and causes, including Catholic schools, parishes and religious vocations in the Wollongong Diocese, CASTNET, Centacare, Kids of Macarthur Health Foundation, Mater Dei, Lifeline Macarthur, St Vincent de Paul, a number of internal sporting clubs, and numerous other local charities and diocesan activities. Most importantly, the Applicant is a strong supporter of local youth-oriented organisations, including Youth Solutions and Youth Off The Streets. The Applicant currently employs a total of 334 staff (98 full time, 171 part time and 65 casual ). The Applicant exists for the benefit of its members and guests, and provides members of its Local Community with a central meeting place.

### **1.8 Financial performance of the Applicant**

1.9 The Applicant had a total revenue in 2008 of \$41.7 million and a pre-tax loss of \$178,200. Gaming machine revenue for 2008 was \$23.6 million, representing 56.8% of total revenue.

Total bar revenue was \$4.2 million (10%) and food and catering revenue was \$4.9 million (11.8%). The Applicant paid \$6.4 million in gaming machine duty in 2008. The Applicant made donations of \$1.2 million in the year ending 30th June 2008, whereby it exceeded its CDSE contributions by over \$850,000. The Applicant had a total employee benefits expense of \$12.5 million, including payroll tax.

1.10 **Gaming machine indicators**

1.11 The Applicant operates 450 gaming machines currently. The Applicant had a profit per gaming machine (total turnover less payouts) of \$57,430 for the 2008 year. The average net revenue per gaming machine for the Campbelltown LGA in 2008 was \$52,588. The Applicant projects that each additional gaming machine will return a profit of approximately \$60,000 per machine per annum. The additional machines will add an estimated \$1.2 million to the net revenue of the Applicant.

1.12 **Proposal**

1.13 Approval of the Application will provide numerous positive contributions to the Local Community. Positive contributions include additional employment, taxes and CDSE contributions.

1.14 The major part of the proposal relates to an additional \$50,000 to a not-for-profit organisation, Youth Solutions which the Applicant has an existing relationship with. Youth Solutions provides initiatives and projects to the Macarthur area (of which Campbelltown and surrounds is a part of) to ensure the promotion of a positive lifestyle to young people. The Applicant will commit \$50,000 per year for a minimum of three years and thereafter contingent on the success of the program to Youth Solutions to provide the on-going provision of its 'Don't Be (a) Random' program. The Don't Be (a) Random program has the overall aim to reduce binge drinking amongst 18-24 year olds in the Local Community through a mixture of educational programs and awareness campaigns. Further detail in relation to this program is presented later in this LIA.

## 2 **RESPONSIBLE GAMBLING MEASURES**

2.1 The Applicant's gaming machine operation is in strict accordance with legislated and optional responsible gambling measures and is considered best practice in this area. A copy of the Applicant's House Policy on the Responsible Conduct of Gambling is included at Annexure 1. The Applicant operates its responsible gambling house policy which is drafted in accordance with the legislative requirements stated in the *Gambling Legislation Amendment (Responsible Gambling) Act 1999*, the *Registered Clubs Act 1976*, the *Gaming Machines Act 2001* and accompanying regulations. The Applicant's harm minimisation strategies include:

- All employees involved in gaming related duties hold a responsible conduct of gambling qualification in an approved course;
- All prizewinners receive prizes in accordance with clause 13 Gaming Machines Regulation;
- The prize schedule of the Applicant is operated in accordance with clause 14 Gaming Machines Regulation;
- The Applicant operates its multi-terminal gaming machines in accordance with

- clauses 16 and 17 of the Gaming Machines Regulation in relation to maximum bet amounts and prize winning cheques;
- The Applicant maintains certain records as per clause 18 and 19 Gaming Machines Regulation;
  - The Applicant maintains records relating to gaming machine prizes as per clause 15 Gaming Machines Regulation;
  - No inducements as specified in clause 48 of the Gaming Machines Regulation 2002 are offered by the Applicant to gamble;
  - Player information brochures in relevant community languages are kept in the Venue as per clauses 22, 23 and 24 Gaming Machines Regulation;
  - Signage containing wordage as per clauses 26, 25 and 49 of the Gaming Machines Regulation 2002 are located in conspicuous positions in all gaming areas of the Venue;
  - All jackpot link monitors are located in gaming or bar areas only;
  - The identity of any prize winners are not published;
  - The Applicant does not promote gambling outside the Venue, including not providing gambling related signage which draws attention to the availability of gaming machines in the Venue, includes a term or expression frequently associated with gambling or relates to gambling franchise of gambling business;
  - The Applicant maintains records of its player loyalty scheme in compliance with clauses 42, 43 and 44 Gaming Machines Regulation;
  - The Applicant operates its player loyalty scheme in accordance with section 45 of the Gaming Machines Act 2001, specifically provisions relating to promotion of cash prizes over \$1000, exchanging of prizes for cash, redemption of bonus points for cash and advises of availability of player activity statements upon request;
  - All gaming machines at the Venue are located in areas which do not attract members of the public who are outside the Venue or are contrary to public interest;
  - The Applicant operates its gaming machine operations in accordance with the ClubsNSW Code of Practice;
  - No minors are ever allowed access to gaming areas of the Venue and are supervised at all times by responsible adults in non-restricted areas of the Venue;
  - Strong links are maintained with established referral systems problem gambling counselling services in compliance with clause 43 Gaming Machines Regulation;
  - The Applicant operates the ClubSafe self exclusion scheme in compliance with clause 47 Gaming Machines Regulation;
  - The availability of the ClubSafe self exclusion scheme is advertised in prominent positions in the Venue;
  - Consumer information on the chance of winning maximum prizes and jackpots is made available in the gaming area;
  - Gaming machines notices on the dangers of excessive gambling are placed in all required areas;
  - Signage on the unavailability of credit facilities, both through access to credit funds via Automatic Teller Machines and through no facility at the venue;
  - That the Applicant does not cash cheques;
  - No cashing of third party cheques is possible;
  - Clocks are clearly visible in all areas of the Venue as per clause 28 Gaming

Machine Regulation;

- No cash prizes in gaming promotions;
- Limiting the value of prize winning cheques to \$2,000;
- Only the provision of opt-in marketing is undertaken and only as part of the Applicant's full suit of promotions;

2.2 The Applicant has also implemented additional measures to ensure compliance with recent amendments to the *Gaming Machines Act 2001* and associated *Regulation*, this includes:

- No ATM in the Venue permits the dispensing of cash withdrawn from a credit account
- Any unclaimed prizes are now processed as follows:
  - The Applicant places any unclaimed jackpot winning tickets not claimed within 12 months in a conspicuous area of the Venue for one month;
  - Any unclaimed gaming machine tickets or jackpots not claimed during the 12 month period are now to be paid into the Community Development Fund;
- All prize winning cheques now clearly state - '*Prize winning cheque – cashing rules apply*'.

2.3 The Applicant is a member of ClubSafe, and has adopted its best practice guidelines and policies. As such, the Applicant goes beyond compliance with current legislation.

### **3 LOCAL COMMUNITY**

3.1 The Legislation provides that there must be a positive contribution from approval of the Threshold Increase Application. The approach to which the Applicant has defined its Local Community has been developed through its analysis of membership penetration in the surrounding area and its market share. A registered club will have a membership penetration in urban and semi-urban areas of approximately 5kms. This assessment is linked heavily to legislative requirements pertaining to compulsory membership of any person residing within 5kms of the registered club in question. A diagram of the Local Community is included as Appendix 3 and includes:

- The following suburbs: Ambarvale, Airds, Blairmount, Bradbury Campbelltown, Claymore, Currans Hill, Eagle Vale, Eschol Park, Glen Alpine, Leumeah, Rosemeadow, Ruse, St Helens Park, and Woodbine; and
- Parts of the following suburbs: Andrews, Catherine Field, Gilead, Kearns, Kentlyn, Minto, Mount Annan, Raby and Wedderburn.

3.2 It is submitted for the purpose of assessment that this area is the Local Community of the Venue.

### **4 DEMOGRAPHY**

4.1 The Campbelltown LGA is located in the south western suburbs of Sydney located 55kms from the CBD. Covering an area of 312km<sup>2</sup>, the LGA has several major residential, shopping and commercial centres. Campbelltown services a number of rural

and semi-rural areas of the Outer South Western Sydney Statistical Sub-Division. In 2006 its population was 143,076 with a population density of 483 persons per square kilometre. In 2006 nearly 30% of the LGA and Local Community population were aged less than 18 years of age comparing to 24% for NSW. The younger age profile is also reflected by the median age of 32 compared to NSW with 37 years. Both the LGA and Local Community is characterised by its relatively young population, as indicated by its median age of only 32, compared to the NSW median of 37. 46% of families in the LGA have children under the age of 15, compared to only 40% of families in NSW. This data demonstrates that the LGA is collectively younger than NSW youthful.

- 4.2 The Campbelltown LGA has a SEIFA (2006 social-economic index of relative advantage-disadvantage) of 959, which is lower than the State average of 978. An alternative measure of SEIFA is provided by the ABS. Each LGA in NSW has been ranked in deciles (ranges of 10 percent). The first decile denotes the most disadvantaged LGAs, the tenth decile, the most advantaged. The Campbelltown LGA falls in the 7th decile. It therefore ranks above the majority of all NSW LGAs. The advantage of using this method to analyse SEIFA is that it allows comparison with all LGAs, not simply a State average, which is skewed by a small number of very high SEIFA estimates for certain LGAs. This is emphasised by the fact that in 2006 only 50 of 151 LGAs (excluding Unincorporated NSW) or 33.1% of all LGAs, had a SEIFA in excess of the NSW average.

## 5 POSITIVE CONTRIBUTIONS

- 5.1 The granting of the Application will yield a significant social and economic benefit for the Local Community and LGA through a number of major and ancillary positive contributions, including:

1. Additional employment;
2. Additional CDSE contributions;
3. Additional state taxes;
4. An ongoing sponsorship arrangement with local charity, Youth Solutions.

- 5.2 The various positive contributions are provided in greater detail below.

### 5.3 Additional employment

- 5.4 The revenue generated by the additional gaming machines will result in a further one full time position becoming available at the Venue. The additional position will provide an additional employee benefits expense of \$45,000 per annum to the Applicant's total payroll.

### 5.5 Additional CDSE Contributions

- 5.6 The Applicant estimates a total additional revenue from the 20 gaming machines subject to the Application as being approximately \$1.2 million. This will generate an additional \$18,000 in Community Development and Support Expenditure for the Campbelltown CDSE Committee to distribute. Whilst the exact beneficiaries of the additional CDSE funding cannot be determined at this stage, all recipients will be located mostly if not wholly in the Applicant's Local Community. This additional CDSE support is provided in conjunction with the Applicant's existing support to a number of local organisations, Catholic and non-Catholic primary and secondary schools and sporting and non-sporting

organisations in the LGA which will continue to be supported through the Applicant's operations. The Applicant plays a major role in the social infrastructure available to the relatively young population including the provision of the Cube Entertainment Centre and operates with a responsibility to its members and its community in providing support to a number of organisations, charities and non-for-profits. The additional gaming machines in the Venue will ensure the community benefit side of the Applicant's operations will continue to grow as the Applicant grows, providing sustainable support to much needed community projects.

5.7 **Additional taxes**

5.8 Additional state taxes are estimated to average \$404,307 per annum, along with an estimated additional \$2,377 in payroll tax per annum. The proportion of this total amount of \$406,684 which flows back to the Local Community (estimated on a per capita basis) is \$6,313 per annum.

5.9 **Corporate Partnership Proposal with Youth Solutions**

5.10 Background to Youth Solutions and relationship with Applicant

5.11 The Applicant has a long-standing relationship with the locally run organisation, Youth Solutions, a non-Government, community-based, youth-oriented drug and alcohol abuse prevention organisation. Youth Solutions was established to provide Campbelltown and surrounds with a specialist resource in youth drug and alcohol prevention. Youth Solutions undertakes relevant research and devises and runs education programs aimed at preventing drug and alcohol abuse. The vision statement of Youth Solutions is *'Supporting young people to make safer life choices to achieve their full potential'* and their mission statement *'creating solutions with young people, families and the community to promote positive life outcomes by preventing harmful alcohol and drug use.'*

5.12 Youth Solutions was founded in 1988 and has been recognised at State and Federal levels for examples of best practice in the provision of their services. Examples of Youth Solutions work include:

- Alcohol Initiatives - Party Hard Think Safe (initiative targeting young women 18-25 years in licensed premises), Safer Celebrations (youth safety initiative) and its Responsible Service of Alcohol Training program to persons aged 16-25 years;
- Drug Initiatives - Youth Drug Forums (peer education targeting young people in High Schools), School Solutions Project (whole School drug addiction initiative), Dope EFXU Campaign (cannabis and young people), Inspiring Youth Solutions (youth drug forum and CD Rom) and Safe & Pretty (young females 16-18 years)
- Road Safety Initiatives - U-Turn the Wheel (road safety initiative)
- Parent and Carer Education Initiatives – Parent Links Project (parent peer education program)

5.13 Youth Solutions also ensures drug and alcohol information and referral service information is made available at significant events in the area including expos, festivals, music events and movie nights. As well as ensuring the on-going success of its current efforts and programs Youth Solutions has major projects which will be provided in 2009 – 2010, these include:



- You Choose Smoking Cessation Project – a project to review the current project provision for smoking prevention in the area involving local schools and welfare agencies; and
  - Inspiring Mental Health Project – a project to address adolescent mental health issues.
- 5.14 Youth Solutions and the Applicant have worked together previously through the provision of prevention and research projects at the Venue, in schools and through other organisations. The has seen Youth Solutions and the applicant form a 'Steering Committee' and engage outside assistance to determine the best method of providing Youth Solutions services and initiatives at the Venue. A needs analysis was conducted to identify what projects should be give priority status so as to ensure the most effective services were provided. The Applicant's policies were also amended to reflect the findings of the research through amendments made in December 2008.
- 5.15 The Applicant now seeks to formalise its relationship with Youth Solutions through the additional revenue generated from approval of the Application with the Corporate Partnership Proposal provided in full in Appendix 5 and in summary below.
- 5.16 Corporate Partnership Proposal
- 5.17 A Corporate Partnership Proposal has been developed by Youth Solutions at the request of the Applicant. The Corporate Partnership Proposal is included in full as Appendix 5 to this LIA. A per annum contribution of \$50,000 for three years and thereafter contingent on the success of the program to Youth Solutions has been proposed which will allow Youth Solutions to continue its projects in the Local Community. Whilst further information is presented below and in Appendix 5 the Corporate Partnership Proposal will provide on-going funding to the Youth Solutions project '*Don't be (a) random – plan safe, drink safe, stay safe campaign*'. This project specifically targets young people aged 18-24 years providing the following services:
- Referring young people to appropriate service providers;
  - Raise awareness of binge drinking and alcohol abuse and misuse;
  - Gather data on alcohol harm issues through surveys;
  - Develop a plan of action for any future initiatives; and
  - Implement strategies to reduce harm.
- 5.18 Pending the success of the Application, Youth Solutions will have access to increased funds that will allow the organisation to continue its work in developing and maintaining drug and alcohol health promotional activities in an effort to prevent or reduce alcohol and drug related harm among young people. More specifically, the additional funding will allow the steering committee formed with representation from Youth Solutions and the Applicant to review the overall success of the *Don't Be (A) Random* project to date
- 5.19 Assessed need
- 5.20 The Applicant operates the Cube entertainment centre adjacent to the Venue. The Cube holds regular entertainment for the Local Community including popular bands. This results in a high volume of young people attending the Venue to watch bands at the Cube and start their social nights at the Venue. Young patrons of the Venue usually move onto other licensed premises at some point in the night which results in a concerted effort being made by the Applicant to ensure not only responsible levels of alcohol consumption are

undertaken by young patrons but also their migration between licensed premises is undertaken in a responsible manner. Youth Solutions also identifies that some young people undertake risky drinking behaviour. Part of the *Don't Be (A) Random* project is aimed at achieving safer patterns of consumption both on and off licensed premises and less issues with migration between premises.

- 5.21 Not only is there established need for this type of project at the Venue itself but also in the Local Community as evidenced by the City of Campbelltown's Youth Strategy and the statistics outlining the issue of youth alcohol and drug related harm within the area. Additionally, future population growth of the Local Community, particularly in areas in the Camden LGA are identified by Youth Solutions in the Corporate Partnership Proposal as potentially increasing need for this type of project. This is of particular relevance to the work of Youth Solutions, given that it targets those aged between 12 to 25 years. The latter half of this age bracket have access to current programs and support from the organisation, whereas high school students will benefit more from Youth Solutions' prevention strategies aimed at preventing, rather than treating, harm caused by alcohol and drug use.
- 5.22 In the most recent Campbelltown Youth Strategy, Campbelltown Council lists the 'Health, Wellbeing and Safety' of local youth as a Priority Area. This Priority Area encompasses the prevention of youth crime, the development of improved responses to vulnerable young people, the development of partnerships between youth services and drug and alcohol services and the improvement of the health and well being of young people. The objectives of Youth Solutions echo those of Campbelltown Council. Youth Solutions identifies and seeks to respond to the following statistical challenges:
- *17,000 Australians die due to drug and alcohol related deaths every year.*
  - *The three leading causes of death among adolescents 14-17 years are unintentional accidents, homicide and suicide. These are all alcohol related.*
  - *One third of all driver and pedestrian deaths are alcohol related.*
  - *62% of 18-19 year olds have put themselves in a situation they identified to be HIGH risk whilst drinking alcohol.*
  - *17% of 18-19 years olds are smoking cigarettes daily.*
  - *20.7% of 14-17 year olds have used marijuana in the last 12 months.*
  - *Almost 5 million Australians aged 14 years and over have been abused by someone affected by alcohol.*
  - *Nearly 700,000 people aged 14 years and over went to work in the past 12 months under the influence of alcohol.*
  - *400,000 people aged 14 years and over went to work in the past 12 months under the influence of an illicit drug.*
  - *Future population growth within the Macarthur area over the coming years with the SW Sub Regional Strategy, Oran Park and Turner Road Developments.*
- 5.23 In addition, LGA statistics provided by the OLGR surrounding weekend alcohol related assaults show that the total number of alcohol related assaults per 100,000 population is 387 in the Campbelltown LGA, compared to 311 over all NSW. This demonstrates that there is a particular need within the LGA for efforts towards harm minimisation more generally.
- 5.24 The challenges and statistics provided by Campbelltown Council, the OLGR and Youth Solutions exemplify the need for increased awareness of and response to alcohol and

drug related issues within the Campbelltown LGA. The goals and challenges set by Council as part of their Youth Strategy, and by Youth Solutions as part of their mission, are being met by the programs, campaigns and initiatives Youth Solutions operate in the LGA.

5.25 The *'Don't Be (a) Random'* program is needed in the area to ensure the success of the initiatives being currently undertaken by the Applicant and Youth Solutions are properly followed up by supporting programs of a similar type in the Local Community such as educational and awareness campaigns. The Local Community is particularly characterised as being younger than NSW and therefore an increased need for specifically targeted education and prevention programs is evident from the information presented above. The beneficiaries of this partnership will be the current and future youth of the region, along with the wider community who would benefit from an increase in awareness of alcohol and drug consumption, the risks involved and the support services available. Further details pertaining to this positive contribution are included in Appendix 5.

5.26 Summation of positive contributions to Local Community

5.27 From this information presented above it is estimated that the additional gaming machines will result, either directly or indirectly in an additional \$69,313 in funds to the Local Community per annum and an additional \$50,000 to Local Community organisation, Youth Solutions per annum for three years and thereafter contingent on success of the program.

## 6 CONCLUSION

5.28 This LIA, pursuant to Section 37 of the *Gaming Machines Amendment Regulation 2009*, defines the Applicant's Local Community, details the positive contributions that the Applicant will provide to the Local Community if the Application is approved, and details the harm minimisation and responsible gambling measures that are in place at the Venue.

5.29 The Applicant is a community based registered club which provides needed community support through monetary and in-kind contributions, is a significant local employer and social and recreational meeting place in the Campbelltown area. The Applicant operates gaming at the Venue in compliance with mandated Legislative requirements and operates a best-practice style of interventions and procedures. The Applicant enforces this strict approach based on its House Policy on the Responsible Conduct of Gambling conducting regular in-house training for all of its gaming staff, each of whom holds qualifications in the Responsible Conduct of Gambling.

5.30 The positive contributions put forward in this LIA will not occur without the approval of the Application. The positive contributions include additional employment, additional state taxes and CDSE contributions totaling approximately \$69,313 per annum. A significant per annum contribution of \$50,000 for three years and thereafter contingent on the success of the program is also proposed subject to approval of the Application to the Local Community organisation Youth Solutions. The \$50,000 funding will allow the ongoing provision of the *'Don't Be (a) Random'* drug and alcohol education and awareness program aimed at reducing alcohol and drug related issues for people aged 18-24 years. The positive contributions presented in this LIA warrant approval of this Application.

5.31 It is therefore provided that the test as set out in the Guideline and Legislation is met and the Applicant submits that the Application should be approved.