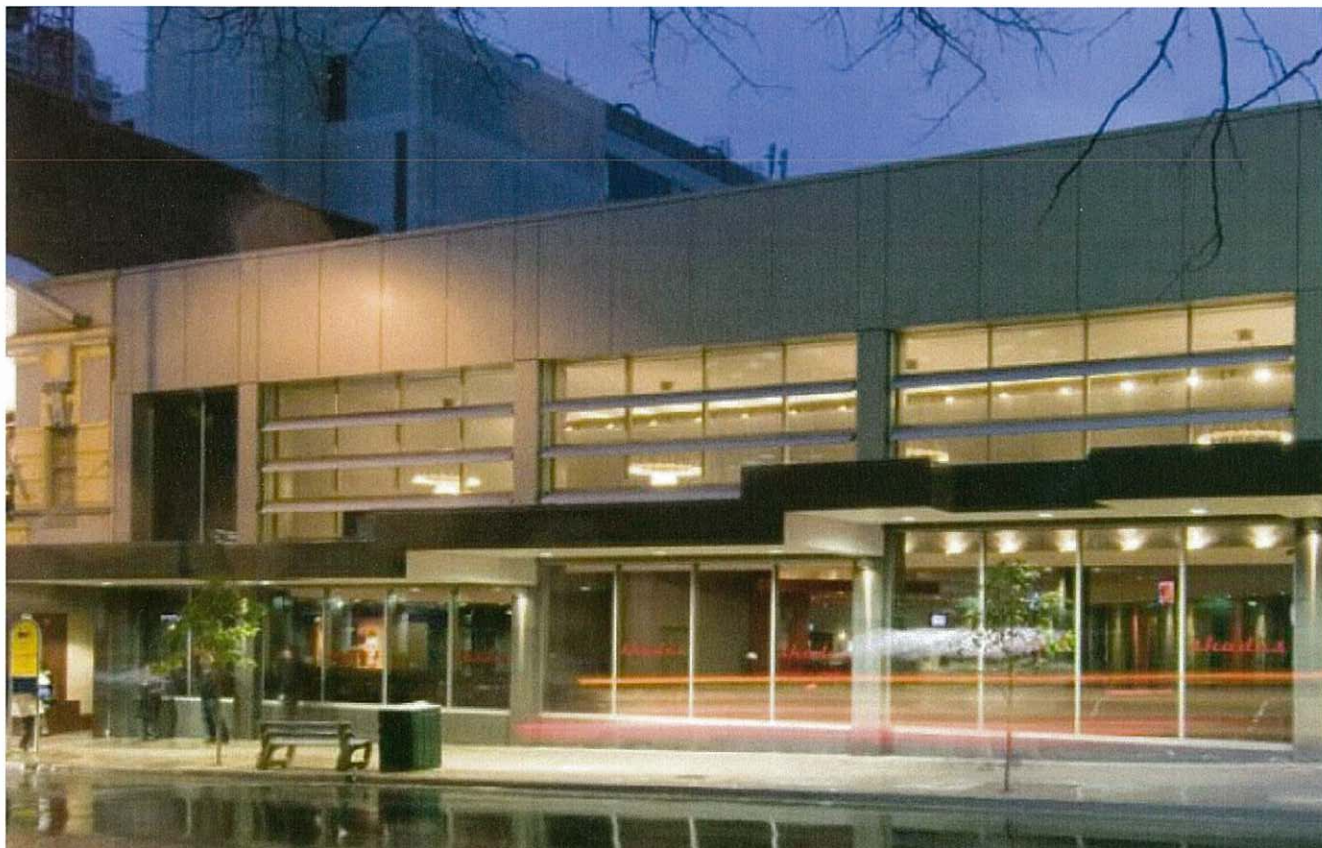

Local Impact Assessment Class 1 Application 1 Thomas Street, Chatswood

Chatswood RSL Club
May 2009



(Photograph: Front view of Chatswood RSL Club Venue, Thomas Street, Chatswood)

Prepared by:



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EXECUTIVE SUMMARY

1. INTRODUCTION

- I. This document is a Local Impact Assessment Class 1 to accompany an application made for the approval of a 'mid range' gaming machine threshold increase of 40 for Chatswood RSL Club Ltd (the "Applicant") at premises situated at 1 Thomas Street, Chatswood NSW (the "Venue") located in the Band 1 Local Government Area (the "LGA") of Willoughby. The Applicant provides amenities, social activities and entertainment to its 13,000 members, its Local Community and guests from outside the locality. In 2008, the Applicant had a total employee benefits expense of \$4.22 million, paid \$2.38 million in gaming machine duty and payroll taxes and made \$87,001 in additional donations over and above CDSE contributions.

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

3. LOCAL COMMUNITY

- III. Chapter 3 of this Report details the communities potentially affected by the approval of the Threshold Increase Application. The Local Community is defined as a 5km radius surrounding the Venue.

4. POSITIVE CONTRIBUTION

- IV. Chapter 5 of this Report details the positive contribution to the Local Community resultant from approval of the Application. The Applicant will provide an additional \$20,000 to the Willoughby CDSE Committee which is over and above the projected \$43,585 through the 1.5% statutory CDSE requirement, to equate to a total additional CDSE contribution of \$63,585 attributable to the additional gaming machines. This additional CDSE contribution will go towards meeting significant demand from Local Community organisations and groups many of which were not partially or fully funded in the 2008 CDSE year. Whilst the exact beneficiaries of the additional CDSE contribution cannot be stated at this time, it is reasonable to expect some comparison with 2008 applicants. This information is provided in the Report.
- V. The Applicant is also undertaking significant redevelopment of the Venue including refurbishment to all areas and construction of new lounge, dining, function rooms and underground car parking costing approximately \$3.5 million. Additional function rooms will allow many Local Community organisations who currently use the limited function space available through in-kind support to utilise the function space more frequently. Other benefits include additional state taxes, employment and construction related benefits. The total positive contribution to the Local Community is equated to approximately \$844,041.

5. CONCLUSION

- VI. 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 and respectfully requests approval of the Application.

1 INTRODUCTION

- 1.1 This Report is a Local Impact Assessment ("LIA") Class 1 to accompany a threshold increase application for a Band 1 Local Government Area venue of 'mid range increase' of 40 gaming machines for Chatswood RSL Club Ltd ("the Applicant"). The Applicant is a returned service's league registered club and is located at 1 Thomas Street, Chatswood, NSW ("the Venue") in the Willoughby Local Government Area ("the LGA").
- 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.
- 1.4 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. The overall aim of a Class 1 LIA is to provide relevant gaming data, social data and issues of concern to the Local Community so that the Authority can determine whether additional gaming machines will provide a positive contribution to the Local Community. In order to comply with the requirements and meet this onus, the approach taken in this LIA is to firstly detail the statutory information requirements prescribed by the Legislation. These are then discussed in the context of the Local Community and LGA, in order to assess the likelihood of the approval of the Threshold Increase Application resulting in a positive contribution towards the Local Community.
- 1.5 Applicant Details
- 1.6 The Applicant seeks the approval of a Threshold Increase Application for an increase of an additional 40 gaming machines. The Applicant is located at 1 Thomas Street, Chatswood ("the Venue") and provides recreational services and community based enterprises for the residents of Chatswood and the Local Community, in the Local Government Area of Willoughby ("the LGA"). The Venue is located within the main commercial area of the suburb of Chatswood. The location of the Venue is identified and illustrated in Appendix 4. The total floor space of the Venue is 4915m² as shown by the layout plan of the Venue provided at Appendix 5. The Applicant has been operating on the present site since 1947, The Applicant incorporates and now totally surrounds the Chatswood War Memorial Hall built in 1921. The Applicant provides the Chatswood RSL sub-branch with suitable offices and amenities at no cost in accordance with its charter and expanded in 2006 to its present footprint. This has proved popular with the Applicant's mature members and guests, and the local business community.
- 1.7 Current Applicant Services, Facilities and Donations
- 1.8 The Applicant continues to be a hub of its Local Community, with numerous organisations utilising its various spaces. The Applicant provides comfortable, free meeting places for organisations including the Chatswood RSL sub-branch, the NZ sub-branch, Royal Marines' Returned Service Association, Wool Traders sub-branch, the local War Widows Guild, Kirribilli Ex-Service Women's Association, senior's exercise classes, Probus Clubs, The Golden Ages Club, Rostrum, The Guide Dogs Association and the Red Cross. Many elderly people travel to Chatswood for medical reasons, and consider the Applicant is a safe haven wherein they can comfortably wait and pass their time before or after their appointments. The Applicant supports youth of the area and provides activities that aim to develop their social responsibility, an example of this is the North

Shore High Schools Music Spectacular, which is now in its third year of sponsorship. In addition The Applicant has commitment \$8,000 over the last six years to the Gordon Cricket Club (Women's Division) as a means of showing support for players in the local area. The Applicant currently has over 13,000 members. The Applicant employed 89 people at December 2008 (33 full-time, 49 permanent part-time and seven casuals). The Applicant exists for the benefit of its members and guests and provides a safe, central, community meeting place.

1.9 Financial performance of the Applicant

1.10 The Applicant's 2008 total revenue was \$12.61 million and a pre-tax profit of \$423,211. Gaming machines revenue for 2008 was \$9.62 million, representing 76% of total revenue. Total bar revenue was \$1.36 million (10.7%) and food and catering revenue was \$1.3 million (10.2%). The Applicant paid \$2.34 million in gaming machine duty in 2008. Payroll tax was set at \$203,239. The Applicant made donations of \$108,441 in the year ending 31 August 2008, whereby it exceeded its CDSE contributions by \$87,001. The Applicant had a total employee benefits expense of \$4.22 million.

1.11 Gaming machine indicators

1.12 The Applicant operates 144 gaming machines and had a profit per gaming machine (total turnover less payouts) of \$66,829 for the 2008 year. The average net profit per gaming machine for the Lower North Sydney Statistical Sub-Division in 2008 was \$44,747. The Applicant projects that each additional gaming machine will return a profit of \$68,000 (per annum). The additional gaming machines will add an estimated \$2.72 million to the operating profit of the Applicant.

1.13 Proposal

1.14 The Applicant puts forward numerous positive contributions to the Application:

- Additional funding to the Willoughby CDSE Committee of \$20,000 per annum to fund a range of to-be-nominated projects as well as the 1.5% statutory CDSE requirement estimated at \$43,585, equating to a total of \$63,585 for 2009;
- Refurbishment of the Venue, including:
 - a new lounge and dining area;
 - new function rooms; and
 - additional car parking space.

1.15 In brief, the Applicant intends to maintain and increase its provision of space for informal socialising and more formalised organisational meetings as well as further support the Local Community through additional CDSE funding over and above its requirement. The viability of these aims is conditional upon the success of the Application for additional gaming machines, as access to an adequate number of gaming machine entitlements is required in order to fund the Applicant's future growth. Further detail in relation to the positive contribution to the Application is provided later in this Report.

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 through 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 maintains particular focus on all areas of mandated legislation especially concerning the provision of available counselling services for members and their guests. This includes:

- All employees involved in gaming related duties hold a responsible conduct of gambling qualification in an approved course;
- No minors are ever allowed access to gaming areas of the Venue;
- Strong links are maintained with established referral systems to problem gambling counselling services;
- 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 for more than \$400 for Club members;
- No inducements are offered to gamble at the Venue;
- No cashing of third party cheques is possible;
- Clocks are clearly visible in all areas of the Venue;
- No cash payments over \$2,000 are made;
- 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;
- All direct advertising of gaming is contained within the Venue premises and is not visible outside the Venue; and
- The availability of player activity statements by players upon request is well known

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'*;
- Linked and progressive jackpots:
 - All gaming machines at the Venue connected to a link clearly indicate which link they are connected to;
 - Correct house numbers are clearly displayed on each gaming machine on the link at the Venue;
 - If at any time any part of the authorised linked gaming machine stops operating as part of system, then that gaming machine is immediately removed from use;
- All work undertaken by any gaming machine technician at the Venue is recorded when ever they:
 - install an approved gaming machine;
 - service or repair a sensitive part of an approved gaming machine;
 - service or repair that involves resetting of the electronic meter of the gaming machine;
 - These records detail the:

- date the work was carried out;
- technicians name and licence number;
- name and serial number of the gaming machine on which the work was carried out.

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

3 LOCAL COMMUNITY

3.1 Definition of Local Community

3.2 The Legislation provides that there must be a positive contribution for approval of the Application. The approach to which the Applicant has defined its Local Community has been developed through its consultation with experienced advisors in the Registered Club industry, recent market share analysis, and its experience gathered through offering its services in the one locality for over 50 years. Generally 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.

3.3 In the context of the information set out above, the Local Community is defined as encompassing a 5km area around the Venue, this area is made up of numerous suburbs. This defined Local Community encompasses approximately 66% of the Applicant's overall geo-coded membership. A diagram of the Local Community is included in Appendix 3.

4 DEMOGRAPHY

4.1 Willoughby LGA

4.2 Willoughby City is located in the northern suburbs of Sydney, approximately 9 kilometres from the Sydney CBD. A map of the Willoughby LGA is included in Appendix 2. Covering an area of 23 square kilometres, it has several major residential, shopping and commercial centres with approximately 27,174 dwellings. Willoughby City is a sub-region of the Lower North Sydney Statistical Sub-Division. At 30 June 2007, its population was estimated at 63,605. At 30 June 2006, its population density was 2,995.5 persons per square kilometre. In 2006 78.7% of the population were aged 18 years and over. This compares to 76% for NSW at the same period. The median age of people residing in the LGA in 2006 was 36 years compared to the state median of 37 years. 60.8% of the population is Australian-born.

4.3 The population of the Willoughby LGA grew at an annual rate of 1.4% during the period of 2006-2007. This figure is slightly higher than the NSW annual rate of growth, which was 1.1% for the same period. At the June quarter, 2006, the rate of unemployment in the Willoughby LGA was estimated at 3.3%, lower than the NSW average of 5% for the period of 2006-2007. The Willoughby LGA has a SEIFA (2006 social-economic index of relative advantage-disadvantage) of 1167, which is higher than the State average of 978. (2033.0.55.001 - Socio-economic Indexes for Areas (SEIFA), Data Cube only, 2006). An alternative measure of SIEFA (relative advantage/disadvantage) is provided in the ABS National Regional Profile for Willoughby LGA. 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 Willoughby LGA falls in the tenth decile. It therefore ranks close to the top 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 CONTRIBUTION

5.1 General

5.2 The granting of the Application will yield a significant social and economic positive contribution for the Local Community through a number of benefits, including:

1. Additional funding to the Willoughby CDSE Committee of \$20,000 per annum and further CDSE generated through operation of the additional gaming machines per the Legislated 1.5% requirement of approximately \$43,565;
2. Redevelopment of the Venue, including:
 - a. Refurbishment of all existing areas;
 - b. Construction of a new lounge and dining area;
 - c. Construction of new function rooms; and
 - d. Construction of additional underground car parking spaces.
3. Additional employment;
4. Additional state taxes;
5. Additional consumer benefits stemming from additional gaming machine play.

5.3 These benefits are discussed in further detail below.

5.4 Additional CDSE Contributions

5.5 The Applicant will commit an additional \$20,000 over the required 1.5% CDSE contribution to per annum. The Applicant made the following CDSE contributions for the 2008 CDSE year:

Category 1- High Need - \$82,500

○ Action Foundation	\$ 4,800.00
○ Chatswood Legacy	\$ 50,000.00
○ DARTS	\$ 2,000.00
○ Lindfield Rainbow Club	\$ 3,200.00
○ Rotary Club of Chatswood Sunrise	\$ 8,000.00
○ Shorecare (50% only)	\$ 2,500.00
○ Streetwork	\$10,000.00
○ Uniting Care Keenagers Day Care	\$ 2,000.00

Medium Need - \$17,090

○ Jobsupport	\$ 5,300.00
○ Kuring-Gai Meals on Wheels	\$ 3,090.00
○ Life Education	\$ 1,550.00
○ Technical Aid for Disabled	\$ 3,150.00
○ War Widows Guild	\$ 4,000.00

Category 2 - Chatswood High School \$42,210.00

- 5.6 The total CDSE contribution for 2008 CDSE year (ending 31 August 2008) was \$99,590 in Category 1 contributions and \$42,210 in Category 2 contributions totalling \$141,800. The Applicant and also the Willoughby CDSE Committee was unable to support all CDSE applicants in 2008 due to a reduction in gaming machine revenue attributable to higher taxes and reduced revenue due to the smoking bans. This resulted in a reduction of \$44,000 from the 2007 CDSE year where \$170,000 was provided.
- 5.7 The Applicant will commit a further \$20,000 in CDSE funding for 2009 as an additional contribution over and above the projected \$43,585 in required CDSE funding. This will result in an additional \$63,535 being provided to the Willoughby CDSE Committee in 2009. In combination with the existing \$100,000 CDSE provision, a total CDSE funding amount for the Applicant is projected at approximately \$163,585. The table provides a summary of 2008 CDSE applicants where requested, funded and shortfall amounts are also shown.

Priority 'High' Applicant	Requested	Funded	Shortfall
Action Foundation	4800	4800	0
Chatswood Legacy	68510	50000	18510
Chinese Elderly Welfare	2850	2850	0
Cottage Counselling Centre	2000	2000	0
Disabled Alternative Road Travel Service	2000	2000	0
Lindfield Rainbow Club	3200	3200	0
Rotary Club of Chatswood Sunrise Inc	8000	8000	0
Shorecare	5000	2500	2500
Spastic Centre	5850	5850	0
Streetwork	10000	7000	3000
Uniting care Keenagers Day Care Centre	2000	2000	0
Priority 'Medium' Applicant			
Alzheimer's Australia	3800	0	3800
Autism Sepctrum Australia	21600	0	21600
Can Mental Health	7500	0	7500
Castle Cove Public School	50000	0	50000
Centacare Catholic Community Services	5860	0	5860
Delta Pet Partners Program	1500	1500	0
Easy Care Gardening	1200	1200	0
Epilepsy Association	5000	0	5000
Jobsupport Inc	5300	5300	0
Ku-ring-gai Meals on Wheels	3090	3090	0
Learning Links	7269	0	7269
Leukaemia Foundation	3050	0	3050
Life Education	1550	1550	0
Lupus Association of NSW	6657	0	6657
Mutiple Sclerosis Ltd	27500	0	27500
Northern Aboriginal Social Plan	3500	3500	0

Palliative Care Foundation	5000	0	5000
Royal Flying Doctor Service	8000	0	8000
Royal Institute for Deaf and Blind Children	4202	0	4202
Royal Life Saving Society	5000	0	5000
Shine for Kids	1244	1244	0
Southern Region SLSA Helicopter Rescue Service	30000	0	30000
Sunnyfield	22598	7100	15498
Technical aid for the Disabled	3150	3150	0
Vision Australia	5548	0	5548
War Widows Guild	4000	4000	0
Willoughby City Council: Ethnic Services	3907	3907	0
Willoughby City Council: Youth Services	35060	0	35060
Willoughby Kids House	20983	0	20983
Youth off the Streets	5000	0	5000
Low priority			
Prostate Cancer Foundation	4250	0	4250
	426528	125741	300787

- 5.8 Approximately \$426,528 worth of CDSE funding was applied for by CDSE applicants in 2008 in the Willoughby LGA. A significant number of applications could not be granted given the reduction in CDSE funding available. The additional \$63,535 will bring the total CDSE funding, assuming a similar level of contribution as last CDSE year is provided to approximately \$190,000. CDSE funding of this size would allow almost 45% of the applicants that made application for CDSE funding in 2008 to receive some funding. Whilst the exact beneficiaries of the additional CDSE funding cannot be provided at this stage, the table above is provided to show the type of CDSE applicants the Willoughby CDSE Committee may receive applications from in 2009. There is a reasonable cross-section of the community that makes application for funding and although the exact beneficiaries of the additional funding cannot be identified at this time, this information provides a general view of who the additional funding may be provided to.
- 5.9 This additional CDSE support is provided in conjunction with the Applicant's existing support to a number of community organisations in the Local Community and in the LGA which will continue to be supported through the Applicant's operations. The Applicant is the predominant registered club in the LGA 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.
- 5.10 Redevelopment of Venue
- 5.11 The Applicant has a strong history of functioning as a meeting place for members of its Local Community. It provides space for informal social gatherings as well as the more formalised meetings of a variety of local organisations. The need for this type of space is continually increasing, and the Applicant wishes to continue to be able to meet its Local Community's demand for additional public space. A new lounge and dining area will provide additional food and beverage services to the Applicant's Local Community. This space will allow for informal socialising and

family-friendly dining. New function rooms will provide space for more formalised gatherings. Specific organisations that currently require function space include through in-kind support are The Golden Ages Club, Netherlands Society, War Widows Guild, Chatswood Junior Rugby, Probus Club of Chatswood, Gordon Women's Cricket Club, Chatswood RSL sub-branch, the Guide Dogs Association and the Red Cross, amongst others. The additional function space will allow for these groups and others to utilise the area more frequently. **A new underground car park will provide additional *secure parking for the Applicant's growing clientele*.** The area of the Venue has little street parking, thus placing additional pressure on the Applicant.

5.12 Appendix 5 contains plans of the redevelopment and refurbishment. The cost of the redevelopment is in excess of \$3.5 million. Development consent was granted by Willoughby City Council in 2007 for a \$10 million redevelopment, however this was scaled back to better reflect the Applicant's current financial position and priorities. This resulted in a downgrading to the current \$3.5 million redevelopment and refocus on the pressing need to construct additional meeting and function rooms and socialising areas. The additional gaming machines subject to this Application will ensure the debt incurred as a result of the redevelopment can be adequately serviced.

5.13 Additional employment

5.14 The revenue generated by the additional gaming machines will result in at least a further ten Full Time Equivalent (FTE) positions becoming available in the Venue. The ten FTE positions may in fact represent a larger number of positions, of lower economic effect per position, but with the same total outcome. The value of the additional ten FTE positions have an employee benefits expense of \$773,609. There are also additional jobs related to the operation of the facility, which will be generated with external services providers, such as contract cleaners and security providers, and the jobs supported during the capital component of the proposed extension of activities.

5.15 Construction related benefits

5.16 Preliminary estimates obtained by the Applicant for the redevelopment of the Venue, is \$3.5 million. National Accounts (based on 1996-1997 data) provide that for every \$1 million worth of output in the commercial construction industry results in the creation of 6 direct FTE positions and 17 FTE positions across the economy. Applied to the total cost of construction of \$3.5 million for the Applicant's proposed development, the project would be expected to generate \$9.8 million of economic activity and 59 full time equivalent jobs during the construction period. The total number of additional persons employed may in fact be higher, as some of the positions created may not be on a full time basis, and thus would account for only the relevant proportion of one FTE position. If it was conservatively assumed that 40% of the additional economic activity and employment was to directly benefit the local economy, an injection of \$3.92 million would result. It is recognised that this is a short term economic stimulus, but of such magnitude that its significance should be taken into consideration, in this local economy. Even if the effect were to be considered over a number of years beyond the construction period, the overall effect remains significant.

5.17 Additional consumer benefit

5.18 The Productivity Commission's 1999 Report into Gambling concluded that the greatest benefit to gaming machine play was consumer benefit. According to the Productivity Commission, the benefits from the liberalisation of the gambling industry come primarily from the satisfaction that consumers obtain from the ability to access what for many is a desired form of entertainment. Even when discounted for excessive spending by problem gamblers, the value of the consumer benefit remains substantially positive – estimated to be at least \$4.4 billion (and possibly as high as \$6.1 billion) each year. (Productivity Commission, 1999, Box 5.1). The venues that operate gaming machines (primarily clubs and hotels), are central meeting places in Australian society, supporting a range of

social activities. Playing the gaming machines is one part of the total set of activities undertaken at the venue.

5.19 Additional taxes

5.20 Additional state taxes are estimated to average \$680,280 per annum, along with an estimated additional \$24,770 in payroll tax per annum. The proportion of this total amount of \$705,050 which flows back to the Local Community (estimated on a per capita basis) is \$6,847.

5.21 Summation of benefits to Local Community

5.22 From this information it is estimated that the additional gaming machines will result, either directly or indirectly in an additional \$844,041 in funds flow into the public and private sector, which will directly benefit the Local Community. A further \$3.92 million will flow into the Local Community economy through shorter term construction related benefits.

6 CONCLUSION

5.23 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.

5.24 The Applicant is a community based registered club with a focus on facilitating services to returned service men and women, providing recreational and social services to its members and through contributions and in-kind support to its Local Community more widely. It has achieved this objective for over 50 years.

5.25 The Applicant intends to continue this support through offering its current services, additional CDSE funding to the Willoughby CDSE Committee to fund a raft of projects and through redevelopment of the Venue. The Venue will be redeveloped to see additional function space, lounge and bistro area and additional car parking. The cost of the redevelopment is estimated at \$3.5 million.

5.26 The additional CDSE funding, including both the Applicant's \$20,000 contribution and statutory contribution will equate to approximately \$63,535. This will go directly towards assisting Local Community organisations, groups and projects. While the specifics of the exact projects cannot be identified at this stage, it will be the case that the additional CDSE funding will go towards ensuring funding gaps are met in the Local Community. The redevelopment of the Venue will provide a positive contribution to the Local Community through refurbishment and redevelopment of a valued and much used community asset. Other additional benefits include additional employment, state taxes and consumer benefit.

5.27 The Applicant operates gaming at the Venue in compliance with mandated Legislative requirements and operates a best-practice set 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. It is therefore provided that the test as set out in the Guideline and Legislation is met and the Applicant submits that the Threshold Increase Application should be approved.