
Local Impact Assessment Class 1 Application 243 Anson Street, Orange

Orange Ex-Services Club Ltd (241483)
October 2009



Orange Ex-Services Club indoor heated pool in use by Local Community residents

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 made for approval of a 'mid range' gaming machine threshold increase of 40 for Orange Ex-Services Club Ltd (the "Applicant") at premises situated at 243 Anson Street, Orange NSW (the "Venue") located in the Band 1 Local Government Area (the "LGA") of Orange. The Applicant has operated at the Venue for 62 years and provides hospitality based recreational pursuits and community based enterprises for its members and their guests. This LIA provides 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 positive contribution to the Local Community.

2. RESPONSIBLE GAMBLING MEASURES

- II. Chapter 2 of this Report details the mandatory and additional responsible conduct 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 Orange LGA is the Local Government Area of the Venue and a map illustrating the extent of the LGA and the location of the Venue is included as Appendix 2. An area extending 5kms from the Venue has been identified as the Local Community for the purpose of assessment. Chapter 4 provides a demographic description of the LGA and Local Community.

4. POSITIVE CONTRIBUTION

- IV. Chapter 5 of this Report details the positive contributions resultant from approval of the Application to the Local Community. These include the benefits arising out of the construction of an upgraded and conveniently and safely located amenities block at the Orange Ex-Services Country Club Oval, home to local AFL, touch football and cricket competitions. In their current, limited state, the facilities available to players are prohibiting increased participation in these sports, in an LGA characterised by larger than average numbers of two groups that have a particular interest in such participation – young people and Indigenous people. The proposed upgrade would allow for an increase in participation amongst both of these groups, and would also potentially facilitate a boost to Orange's economy by way of being adequately positioned to compete to host state-level sporting contests. This project is a joint initiative through an application for NSW State Government funding and \$120,000 in funding from the Applicant itself. This \$120,000 contribution represents 10% of the \$1.2 million in additional gaming machine profits, before gaming tax that the Applicant is estimated to receive from the additional gaming machines. Other positive contributions include additional employment and additional state taxes.

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 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 Orange Ex-Services Club Ltd ("the Applicant"). The Applicant is located at 243 Anson Street, Orange NSW ("the Venue") in the Orange 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. 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 established at the site in 1947, having developed from a group of local returned WWI and WWII soldiers. The Applicant has now grown to having over 13,666 members with approximately 48% of the membership retired and 55.5% over the age of 55. The Applicant employs over 191 staff on a full time, part time and casual basis and had total salary and wages in 2008 of over \$5.2 million.

1.6 Current Applicant Services, Facilities and Donations

1.7 The Venue includes various bars, a bistro area and gaming and wagering facilities, as well as function and meeting rooms. The Applicant also operates a 47 unit motel facility, an 18 hole golf course, three bowling greens, cricket oval, soccer fields, touch football fields, tennis courts, an indoor heated 25 metre swimming pool, gymnasium and wedding centre. The Applicant operates these facilities for the use and enjoyment of its Local Community providing thousands of local residents recreational and social areas to use at no cost. The Applicant provides donations to a number of different organisations throughout the local community including , providing \$126,565 in 2008.

1.8 Financial performance of the Applicant

1.9 The Applicant had a total revenue in 2008 of \$16.3 million and a net profit of \$449,140. Gaming machine revenue for 2008 was \$8.6 million, representing 53% of total revenue. Total bar revenue was \$1.4 million (8.6%) and food and catering revenue was \$2.1 million (12.7%). The Applicant paid \$1.95 million in gaming machine duty in 2008. The Applicant made donations of \$126,565 in the year ending 31 December 2008 and had a total employee benefits expense of \$6.13 million, paying \$296,731 in payroll tax.

1.10 Gaming machine indicators

1.11 The Applicant operates 172 gaming machines currently. The Applicant had a profit per gaming machine (total turnover less payouts) of \$51,164 for the 2008 year. The average net profit per gaming machine for the Orange LGA in 2008 was \$40,376. The Applicant projects that each additional gaming machine will return a profit of \$30,000 for the first year of operation. The additional machines will add an estimated \$1.2 m for the first year of operation.

1.12 Proposal

- 2.1 The Applicant has recently made application for NSW State Government funding for the construction of sporting clubhouse and associated amenities at the Orange Ex-Services Country Club Oval, which hosts local AFL, touch football and cricket competitions. The total cost of the project is \$259,500 made up of \$130,000 from the NSW State Government through the grant application, \$120,000 from the Applicant and \$5,000 cash and \$4,500 in kind from the Orange Ex-Services Australian Football League Club. The amenities currently available to players are considered sub-standard, limited, and both dangerously and inconveniently located at a neighbouring licensed premises. The proposed project would see an amenities block, complete with toilets, change rooms, storage space and a canteen, conveniently and safely available on-site, thereby improving the ground's appeal, and enabling increased participation in the sports played there. The project is both conditional of the approval of the State Government Grant application and this Application for the additional gaming machines.
- 2.2 Additional employment will also be generated at the Venue, as will increased taxes, pending the success of this Application. Further detail in relation to the positive contributions is provided later in this Report.

2 RESPONSIBLE GAMBLING MEASURES

- 2.3 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 Appendix 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 prize winners 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 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* 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* 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 identities of any prize winners are not published;
- The Applicant does not promote gambling outside the Venue, including not providing gambling 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 or 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*, specifically provisions relating to the promotion of cash prizes over \$1,000, exchanging 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;
- Strong links are maintained with established referral systems problem gambling counselling services;
- The Applicant operates the ClubSafe self-exclusion scheme in compliance with clause 47 *Gaming Machines Regulation*;
- 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;
- No cashing of third party cheques is possible;
- Clocks are clearly visible in all areas of the Venue as per clause 28 *Gaming Machines Regulation*;
- No gaming cash payments over \$2,000 are made;
- No cash prizes in gaming promotions;
- 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.

2.4 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*'.

2.5 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 Definition of Local Community

3.2 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** its membership penetration in the surrounding area. 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. In the context of the information set out above, the Local Community is defined as encompassing:

- The following suburbs: Bletchington, Glenroi, Orange and Warrendine; and
- Parts of the following suburbs: Bowen, Calare, Canobolas and Clifton Grove.

3.3 It is submitted therefore, that this defined area meets the requirements of the Act, Regulation, and Guidelines. A diagram of the Local Community is included in Appendix 3.

4 DEMOGRAPHY

4.1 Orange LGA is located in the Central Tablelands of NSW, about 260km west of Sydney. The LGA includes suburbs stretching from Shadforth in the South East to Ammerdown in the North West. Covering an area of 290km², the LGA is predominately rural, with expanding residential areas and some industrial and commercial areas cantering on Orange itself. It comprises approximately 14,874 private dwellings is a sub-region of the Bathurst-Orange Statistical Sub-Division. In June 2006, its population was estimated at 35,338 and its population density was 129.9 persons per square kilometre. In 2006 72.8% 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. 92.9% of the population is Australian-born. The population of the Orange LGA grew at an annual rate of 1.2% 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.

4.2 In August 2006, the rate of unemployment in the Orange LGA was estimated at 5.8%, lower than the NSW rate of 5.9%. Orange LGA has a SEIFA (2006 social-economic index of relative advantage-disadvantage) of 966, which is slightly 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. Orange LGA falls in the sixth decile. It therefore ranks in the top half 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.

4.3 The LGA is characterised by its relatively young population, as evidenced by its median age of 36, compared to 37 for NSW. The proportion of the population aged less than 18 years is relatively high at 27.2%, compared to the NSW figure of 24%. The LGA also has a higher than average proportion of families with children aged less than 15 years – 43.3% compared to the NSW figure of 40%. All indicators point to a young, family-oriented population. The

LGA also has a disproportionately high percentage of Indigenous members – 4.4% compared to the state’s 2.1%.

- 4.4 The LAG is characterised as one of the more affluent regional areas in Australia experiencing considerable prosperity underpinned by mining and its status as a regional centre to surrounding local government areas. Demographic indicators also support this view with lower unemployment and a moderate average income level.

5 POSITIVE CONTRIBUTIONS

5.1 General

- 5.2 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. The construction of a sporting clubhouse and associated amenities at the Orange Ex-Services Club Oval;
2. Additional employment; and
3. Additional state taxes.

5.3 Construction of a sporting clubhouse and associated amenities at the Orange Ex-Services Club Oval

5.4 *The site*

- 5.5 The Orange Ex-Services Country Club Oval is regularly used by upwards of 3,000 people, many of whom are children. It offers a top class playing surface appropriate for a variety of sports. It is the home ground of the local touch football and AFL clubs, and is also utilised by the local cricket club on a regular basis. It is the only AFL-appropriate ground in Orange. Recent upgrades to the Oval include surface improvements in 2006 and the addition of lights in 2008.

- 5.6 Currently, there are no change room facilities or toilets available at the Oval. There is also no canteen facility. The closest such amenities are located on the other side of an arterial road, at a neighbouring licensed premises. As well as the general inconvenience this situation poses, it also creates a logistical dilemma in terms of providing children with access to such amenities. The road and car park that separate the Oval from the neighbouring Bloomfield Country Club create an obvious safety hazard. Compounding this is the fact that in order to enter the licensed premises all minors must be accompanied by an adult. There is also only one toilet available at this location. For these reasons, the Oval has been limited as to how well it can service the requirements of young sporting teams and schools who have frequent need of such sporting facilities.

- 5.7 The new Orange Base Hospital and the recently rezoned State Government land in the Oval’s immediate vicinity are likely to create a significant demand for recreational facilities in the area in the near future. The rezoned land is to be developed over the next 20 years as a residential and commercial precinct resulting in substantial population growth in proximity to the oval. This substantial population growth will see significant demand being placed on local sporting ovals and sporting teams. The project, which this Application is linked to will ensure that the current and future residents are able to utilise the facilities in the best possible manner.

5.8 *The project*

5.9 The Applicant seeks to establish a sporting clubhouse and associated amenities within the grounds of the Oval. The surrounds of the Oval include a dilapidated building known as the Pavilion that is included within the State Heritage-listed curtilage of Bloomfield Hospital. The Applicant proposes to renovate this weatherboard building within character in order to provide a canteen, small office, storage and a club room for the ground's various users. An addition to the rear of the building will provide team and umpire change rooms, toilets and additional storage. Male, female and disabled access and facilities will be provided. The Development Application (DA 448/2007(1)) has been approved and is included at Appendix 5.

5.10 *Amount to be contributed*

5.11 The project is estimated to cost \$259,500 in total, \$120,000 of which will be donated by the Applicant pending the success of this Application. Orange Ex-Services AFL Club will donate an additional \$5,000 in cash and \$4,500 in-kind. The Applicant is seeking the remaining \$130,000 from the NSW Department of Sport and Recreation by way of the Community Building Partnership program. The relevant funding application form is included at Appendix 5.

5.12 *Who will benefit from the positive contribution?*

5.13 The defined Local Community extends to 5kms around the Venue. This area is shown on the map included in Appendix 3. The area encompasses numerous residential areas within Orange and the site of the project itself. The oval and facilities is likely to be used by over 3000 current and future users for sporting and related recreational activities. Whilst some of these users reside outside of Orange, the vast majority reside in the Local Community. There will also be use of the oval and amenities in summer during the cricket season. The substantial growth currently and planned for Orange will also ensure demand and usage of the oval and amenities increases over the coming years.

5.14 *Benefit to the Local Community*

- *Responding to the need for accessible and safe sporting facilities for children*

5.15 The Applicant's LGA and Local Community are characterised by the relative youth of their respective populations. This higher than average proportion of children is indicative of the area's particular need for appropriately appointed sporting facilities. As the Orange City Council's Orange Cultural Plan 2007-2011 states, young people in the region identify "sports and clubs/youth groups as among [their] top three [preferred] activities" (p.13), with participation in sport declining with age. The various sporting clubs that regularly utilise the Orange Ex-Services Country Club Oval are each heavily youth-oriented – for example, the City of Orange Touch Association currently has 550 players aged between five and 14 years, as well as many older children, and on top of this facilitates a program called "Jump into Touch" which is targeted at primary school aged children. The Oval also hosts numerous inter-school and regional sporting competitions. These facts demonstrate the need for this facility to be made more user-friendly through adequate provision of services.

5.16 In their current state, the facilities available to users of the Oval are insufficient and inadequate, and their awkward location a source of inconvenience, particularly during inclement weather. The current practice of having to access the amenities located within the nearby licensed premises also means that minors need to be closely supervised at all times, and their location on the other side of an arterial road creates a safety hazard for

younger players. Compounding this situation and spelling out the dire need for the proposed improvements is the fact that Orange City Council's Community Plan 2007-2011 clearly specifies the following targeted outcome:

- *The availability of accessible, safe and affordable recreation and leisure facilities, activities and entertainment that are drug and alcohol free (p.70).*

5.17 The proposed improvements to the Oval will respond to the Council's directive, and will resolve the inadequacies of the currently available amenities, giving the Oval's many users safe access to toilet facilities, change rooms, canteen facilities and the safe storage of sporting equipment, thus rendering the Oval a truly "accessible" and "safe" facility.

- *Facilitating the participation of Orange's Indigenous community in sport*

5.18 AFL and touch football in particular are especially popular with members of the area's comparatively sizeable Indigenous population. Both of these sports are activities that Indigenous Australians have traditionally participated and achieved in. To that end, a number of local touch football teams are sponsored by the Orange Aboriginal Medical Service. The proposed project will facilitate the growing involvement of Orange's Aboriginal residents in AFL and touch football, thereby helping to enable healthy lifestyle choices within this segment of the Local Community. It will also encourage interaction between Indigenous and non-Indigenous residents of the Orange region.

- *Promoting and enabling greater participation in AFL*

5.19 The three sports that are regularly played at the Oval – AFL, touch football and cricket – are each experiencing growing popularity within the Orange area. The Oval's usability, is however particularly essential to the local AFL club, given that it is the single AFL-appropriate ground in the area. The recent upgrades to the Oval increased interest and participation in the sport, and it can be assumed that the proposed construction project would only serve to further this interest and enable even greater participation in the game, thus better facilitating the health and well-being of residents of the Orange LGA.

- *Potentially attracting high-level sporting tournaments and thus tourism to Orange*

5.20 Due to the very limited nature of the facilities as they currently exist, the Oval has been largely unable to attract representative-level sporting tournaments, meaning that the Orange area has been forced to forfeit a number of potential tourism opportunities. The proposed upgrade offers the prospect of competing for high-level sporting contests and carnivals, such as the NSW Touch Association Junior State Cup or Country Championships, and AFL State Regional Championships. Such events would be not only beneficial to the promotion of sport within the Orange area, but would also provide a boost to Orange's economy. The NSW Touch Association Junior State Cup, for instance, held in Wollongong recently, attracted a total attendance of between 10,000 and 15,000 visitors to the area over a two-day period.

5.21 *Support for the project*

5.22 A number of local organisations have written letters in support of the Applicant's funding

application. These include:

- **Orange City Council**, which believes that the project will make the Oval “a better, safer and more functional facility for its users”;
- **City of Orange Touch Association**, which believes that the project will “not only be of immense benefit to [its] members, but also to the wider communities of Orange and district”;
- **Orange Aboriginal Community Working Party**, which notes that the Aboriginal community has a “high percentage of players involved in [touch football]” and is thus “supportive of [the] submission for funding”;
- **Orange Aboriginal Medical Service**, which claims that “increasing the access and participation of [its] community to activity and exercise can be strengthened through the provision of adequate and appropriate facilities”;
- **Orange Ex-Services AFL Club** believes that “upgrading the facilities [is] imperative [in order] to continue the ongoing growth [of] the sport with all its benefits”;
- **AFL (NSW/ACT) Commission**, feels that the project is “very worthwhile and important given the increase in usage for school and club based competitions. It is also important for attracting other AFL (NSW/ACT) events that may be held in the future”; and
- **Orange & District Cricket Association**, which is “certain that the proposed improvements would be used by a wide variety of people and would be a great benefit to the community”.

5.23 These letters of support can be found at Appendix 5.

5.24 Construction related benefits

5.25 Appendix 5 includes the application made to the State Government for the grant funding for the Project. The Application includes several positive construction related benefits to the Project. This includes reference to the generation of “employment for a local building company for approximately 3 months.” The total cost of the project being \$250,000, using in-pup out-pup construction multipliers this will generate approximately \$700,000 in construction related add-on benefits, such as additional retail spending. Using this same modelling, a further four full time construction related positions will be created.

5.26 Additional employment

5.27 The revenue generated by the additional gaming machines will result in a further two full-time positions becoming available at the Venue. The full time benefits expense of the additional two positions will be approximately \$80,000 per annum.

5.28 Additional taxes

5.29 Additional state taxes are estimated to average \$614,400 per annum, along with an estimated additional \$1207 in payroll tax per annum. The proportion of this total amount of \$615,607 which flows back to the Local Community (estimated on a per capita basis) is \$3,322.

5.30 Summation of positive contributions to Local Community

5.31 From this information it is estimated that the additional gaming machines will result, either directly or indirectly in an additional \$203,322 in funds, will directly benefit the Local Community.

6 CONCLUSION

5.32 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.

5.33 The Applicant is a community based registered club which provides needed community support through additional donations exceeding those required through CDSE contributions. The Venue provides a central meeting place for its Local Community, including numerous recreational and social facilities and opportunities existing for the benefit of members and guests.

5.34 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.

5.35 The positive contributions put forward in this LIA will not occur without the approval of the Application. There is no doubt that the construction project at the sporting ground in question will be a positive contribution to the Local Community of the Applicant. The total revenue generated from the additional gaming machines subject to the Application is estimated at \$1.2 million for the first year of operation. The total contribution to the project is \$120,000. This represents 10% of the estimated additional profit, before State taxes from the additional gaming machines. This positive contribution will assist the current sporting teams and other users of the oval and will result in increased utilisation of the recreational space available. There is considerable support for the project from a number of the different local stakeholders including Orange City Council as well as various sporting teams. The area surrounding the site is also experiencing considerable population growth being mainly made up of younger persons. This project is substantial and is targeted specifically at the Local Community of the Venue. The construction project is a positive contribution to the Local Community.

5.36 Other positive contributions include the construction related benefits stemming from the project, additional employment at the Venue and additional state taxes. A total economic positive contribution is estimated at \$203,322 to the Local Community.

5.37 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.