



# VGCCC Application for the Installation of 70 EGMs at Club Wodonga, Wodonga

Social and Economic Impact Assessment

Wodonga City Council

9 July 2025

Prepared by the NBA Group  
on behalf of Huon Hill Club Ltd  
trading as Club Wodonga

### **Copyright**

© NBA Group Pty Ltd. Except as provided by the Copyright Act 1968, no part of this publication or its appendices may be reproduced, stored in a retrieval system or transmitted in any form or by any means without the prior written permission of the publisher.

### **Disclaimer**

This report may be of assistance to users and has been made with careful consideration and with the best information available to the NBA Group Pty Ltd at the time of writing. Before relying on information in this report, users should carefully evaluate the accuracy, completeness and relevance of the information provided for their purposes. The NBA Group Pty Ltd does not accept responsibility for how users apply or rely on the information in this report.

## Abbreviations and Definitions

The following abbreviations and definitions are used throughout the body of this report:

<b>ABS</b>	Australian Bureau of Statistics
<b>Decile</b>	A tenth of the data represented. The first decile is the lowest 10% of the data range
<b>Destination Venue</b>	One that encourages a pre-determined decision to gamble, making it less likely that problem gamblers will attend venues on impulse alone. Generally located away from everyday activities such as shops, thus avoiding the “ant-trail” mentality which suggests that having to pass a venue en route to a daily task would more likely cause impulsive or convenience gambling
<b>EGM</b>	Electronic Gaming Machine
<b>Expenditure</b>	The total amount lost by players
<b>LGA</b>	Local Government Area; a geographical area under the responsibility of a local government council. There are 80 LGA’s in Victoria
<b>Municipal Cap</b>	Maximum permissible number of gaming machine entitlements within a municipality
<b>PGSI</b>	Problem Gambling Severity Index; created by Ferris and Wynne 2001. A nine-item index, the first four of which assesses problem gambling behaviours, the next five of which assess adverse consequences of gambling. Scores are allocated per item between 0 to 3 with 3 being most problematic.
<b>Regional Cap</b>	Maximum permissible number of gaming machines within a subset of the municipality
<b>RSA</b>	Responsible Service of Alcohol
<b>RSG</b>	Responsible Service of Gaming
<b>SA1</b>	Statistical Areas 1; SA1s have generally been designed as the smallest unit for the release of census data. SA1s have a population of between 200 and 800 people with an average population size of approximately 400 people
<b>SA2</b>	Statistical Areas 2; area based on officially gazetted State suburbs and localities, defined by the ASGS to replace SLA’s. For the 2016 Census, there are 454 SA2s in Victoria. SA2s replace the previous SLA, Statistical Local Area
<b>SEIFA</b>	Socio-Economic Indexes For Areas
<b>Transferred Expenditure</b>	Expenditure transferred from other venues
<b>VGCCC</b>	Victorian Gambling and Casino Control Commission
<b>VSW</b>	Venue Support Worker

## Executive Summary

---

1. I, Nick Anderson, have been engaged by Huon Hill Club Ltd (the Applicant) to review the social and economic impacts of the installation and operation of 70 Electronic Gaming Machines (EGMs) at Club Wodonga (currently trading as the Huon Hill Hotel).
2. I was originally engaged to review the impacts of 75 EGMs, however, following discussions between the Applicant and Council the number of EGMs being sought was reduced from 75 to 70 and as such my initial assessment has been reviewed accordingly.
3. Huon Hill Hotel ("the Venue") is located at 48 Reid Street, Wodonga, within the City of Wodonga, and is owned and operated by Wodonga Nominees Pty Ltd and does not currently operate EGMs.
4. The Venue is set to be transformed to Club Wodonga as part of a major redevelopment proposed by Applicant which includes the creation of Club Wodonga which will become the occupier and operator of the Venue.
5. I have predominantly taken instructions in this matter from Elizabeth Edwards of Williams Winter Solicitors acting on behalf of the Applicant.
6. At the time of writing this report, there are a total of 150 EGMs, across three (3) venues in the City of Wodonga.
7. This proposal seeks approval for the introduction and operation of 70 EGMs to the Venue. This will see the total number of EGMs operating within the Wodonga LGA increase to 220. The current LGA cap determined by the State Government for the City of Wodonga is 309.
8. Once Club Wodonga commences operation the community will be the primary beneficiary due to the club status of the owner and operator with the expertise and financial backing of an experienced, generational hospitality operator.
9. In summary, the potential impacts of this application have been assessed and the resultant benefits and disbenefits, should it be approved, are as follows:

### Benefits

---

- Establishment of a community focussed club venue not currently available in Wodonga;
- Establishment of community contributions program to benefit a wide range of local Wodonga clubs and community groups;
- Improved high-quality hospitality venue with an expanded range of uses within the Wodonga commercial district;

- Development of a multi-use club venue in Wodonga that presents as an alternative for locals (residing in Victoria) to venues of a similar nature across the border in Albury that they currently patronise for their gaming and hospitality requirements;
- Increased employment for locals at the Venue ;
- Major capital works at the Venue will result in contracts for local tradespeople;
- Increased supplier contracts for local businesses providing goods and services to the Venue;
- Establishment of a modern club gaming venue with a focus on best-practice RSG policies and procedures and a purpose-built gaming lounge; and
- Establishment of a club venue that aims to comply with all relevant Council policies, procedures and strategic vision objectives as they relate to statutory planning, strategic planning and relevant liquor and gaming requirements.

#### Disbenefits

- Introduction of an additional gaming venue into the City of Wodonga; and
- Potential to increase problem gambling within the City of Wodonga.

10. The benefits and disbenefits of the application are weighted in the Table A below, to which more detail is given in Section 7 of this report.

**Table A | Summary of the Social and Economic Benefits and Disbenefits**

<b>Economic Benefits</b>	<b>Weight Given</b> (Significant/Moderate/Low/Marginal)
<b>Community contributions program</b>	<b>Significant</b>
<b>Increased employment</b>	<b>Moderate</b>
<b>Increased supplier contracts</b>	<b>Low</b>
<b>Retain hospitality expenditure in Wodonga (Victoria)</b>	<b>Moderate</b>
<b>Capital investment and venue development</b>	<b>Low to moderate</b>
<b>Social Benefits</b>	
<b>Support to local clubs and community groups</b>	<b>Moderate</b>
<b>Club venue with focus on RSG</b>	<b>Moderate to Significant</b>
<b>Club Wodonga initiatives support Council in supporting community</b>	<b>Low</b>
<b>Club venue with a broader range of uses and increased family focus</b>	<b>Low</b>
<b>Economic Disbenefits</b>	<b>Weight Given</b> (Significant/Moderate/Low/Marginal)
<b>Potential increase for problem gambling</b>	<b>Low to Moderate</b>

Introduction of a new gaming venue in a vulnerable community	Low
Negative impact on existing gaming venues in Wodonga	Low
Social Disbenefits	
Potential negative community reaction to a new gaming venue	Low

11. I find that, in this instance, the potential social and economic benefits outweigh the potential social and economic disbenefits of the establishment of Club Wodonga as proposed. It is significant, in my opinion, that the geographical location of the proposed club on the border between Victoria and NSW is such that the local community has had a long-term exposure and access to EGM gaming (in Albury) and that the establishment of a new club venue with a strong focus on community support, collaboration with Council and stringent RSG will have less negative impact on its catchment than a new club venue in any regional service centre town elsewhere in Victoria. This report aims to address and substantiate those conclusions.
12. It is my professional opinion that the introduction of 70 EGMs to the Venue will result in an overall **net benefit** to the Wodonga City community.



Nick Anderson  
Managing Director

## Contents

1	Introduction.....	8
1.1	Background .....	8
1.2	Facts, Matters and Assumption .....	9
1.3	Documents and Material Considered .....	9
2	Location and Venue Operations .....	10
2.1	Location.....	10
2.2	Hours of Operation .....	13
2.3	Current Employment at the Venue .....	16
2.4	Zoning and Land Use .....	17
2.5	Social and Economic Profile of the Area .....	20
2.5.1	Residential Population in the Venue Catchment.....	20
2.5.2	Forecast Population .....	22
2.5.3	Demographic Profile .....	22
2.5.4	SEIFA Index.....	25
3	The Proposal .....	34
3.1	The Applicant .....	34
3.2	Expenditure on Capital Works .....	35
3.3	Existing Facilities .....	35
3.4	Ongoing Employment .....	39
3.5	Supply Contracts .....	39
3.6	Complementary Expenditure .....	41
3.7	Community Contributions.....	41
4	Impact Analysis.....	45
4.1	Overview .....	45
4.2	2017 Gaming Cap Review.....	45
4.3	Existing Venues and EGM Density.....	46
4.4	Venue Catchment.....	46
4.5	Other Licensed Venues .....	47
4.6	Increased Gaming Opportunities .....	50
4.7	Proposed Hours of Operation .....	53
4.8	Community Wellbeing.....	53

4.8.1	Community Attitude .....	53
4.8.2	Community Support.....	54
5	Gaming Approval and Council Policy .....	55
5.1	Council Policies.....	55
5.1.1	Local Council Planning Policy .....	55
5.2	State Planning Policy – Clause 52.28 Gaming .....	58
5.3	Gaming Approvals and Precedents .....	59
5.3.1	Former VGCCC Decisions .....	59
5.3.2	Problem Gambling and Gambling Related Harm.....	64
5.3.3	Purported Links to Domestic Violence .....	67
5.3.4	Risks to Problem Gamblers at the Venue .....	68
6	Supporting Documentation .....	70
6.1	Expenditure Report .....	70
6.2	RSG Measures .....	73
7	Social and Economic Impacts .....	74
7.1	Economic Benefits.....	74
7.2	Social Benefits .....	76
7.3	Economic Disbenefits .....	77
7.4	Social Disbenefits .....	78
8	Impacts of the COVID-19 Pandemic .....	80
8.1	Impacts of COVID-19 on Gambling Activity .....	80
9	Conclusion .....	82
10	Appendices .....	84
10.1	Nick Anderson – Curriculum Vitae .....	84
10.2	Expenditure Report by SW Accountants & Advisors.....	84
10.3	Harm Minimisation Report by DNS Specialist Services.....	84
10.4	ONYX Gaming Layout Plan .....	84
10.5	Development Plans by BSPN Architects.....	84
10.6	Quest and Bistro Post Code Counts .....	84
10.7	Charitable Objects.....	84
10.8	Community Contributions.....	84



# 1 Introduction

---

## 1.1 Background

13. I have been instructed by Elizabeth Edwards of Williams Winter Solicitors acting on behalf of Huon Hill Club Ltd (The Applicant) and the Feros family to investigate the social and economic impacts of a proposal to introduce 70 electronic gaming machines (EGMs) to the Venue as a club.
14. I was originally engaged to review the impacts of 75 EGMs, however, following discussions between the Applicant and Council the number of EGMs being sought was reduced from 75 to 70 and as such my initial assessment has been reviewed accordingly.
15. The Venue is located at 48 Reid Street, Wodonga, VIC, 3690, in the municipality of the City of Wodonga and does not currently operate EGMs.
16. The Gaming Regulation Act (the Act) (Section 3.3.7) states:  
  
*“(1) The Commission must not grant an application for approval of premises as suitable for gaming unless satisfied that—*  
*A. the applicant has authority to make the application in respect of the premises; and*  
*B. the premises are or, on the completion of building works will be, suitable for the management and operation of gaming machines; and*  
*C. the net economic and social impact of approval will not be detrimental to the well-being of the community of the municipal district in which the premises are located.”*
17. (A) In response to the above, the applicant is Huon Hill Club Ltd, also applicant for Full Club VOL V25100590. The premises is owned by JDA Victorian Investments Pty Ltd Trustee for JDA Victorian Investments Family Trust and with the landowner’s consent the Venue, currently operated by Wodonga Nominees Pty Ltd as a hotel, will convert to the operation of Huon Hill Club Ltd trading as Club Wodonga upon grant of Full Club VOL and approval of premises.
18. (B) The premises will be developed in accordance with plans prepared by BSPN Architects and in line with regulatory and legislative requirements for licenced gaming venues to operate 70 EGMs within a lower ground floor gaming area.
19. (C) This report seeks to determine any social and economic impacts this application presents to the well-being of the City of Wodonga municipality, to be measured as positive, negative, or neutral. It is noted that the Act requires that there be no net detriment resulting from the proposed increase.

20. In considering that this application satisfies the no net detriment requirement, the following factors have been addressed:
- The municipal characteristics and policies;
  - The proposed operation of the Venue and the range of services provided;
  - Existing EGMs; numbers, location and expenditure in the LGA and surrounding areas;
  - Community attitude;
  - Social and economic influences, including the SEIFA index;
  - The geographical location of the Venue on the Victorian/NSW border
  - Problem gambling / RSG measures: and
  - The impacts of a club venue compared to another hotel venue.
21. I have included a copy of my Curriculum Vitae at Appendix 1 of this submission, which outlines my experience and qualifications in social planning and gaming matters.
22. All enquiries I deem to be necessary and appropriate have been made, and to my knowledge, no matters of significance that I regard as relevant have been omitted.

## 1.2 Facts, Matters and Assumption

23. In forming the opinions contained in this report, I have addressed the following facts and assumptions:
- Received instructions from the Applicant and venue management regarding the intended operation of the Venue;
  - Reviewed information from the Expenditure Report by SW Accountants & Advisors;
  - Reviewed the Harm Minimisation Report provided by DNS Specialist Services;
  - Reviewed proposed development plans prepared by BSPN Architects;
  - Reviewed gaming room layout plans and verify existing and proposed conditions of the premises;
  - Undertaken site analysis; and
  - Requested bistro and Quest accommodation post code data to develop an accurate profile of patrons at the Venue and the venue catchment.

## 1.3 Documents and Material Considered

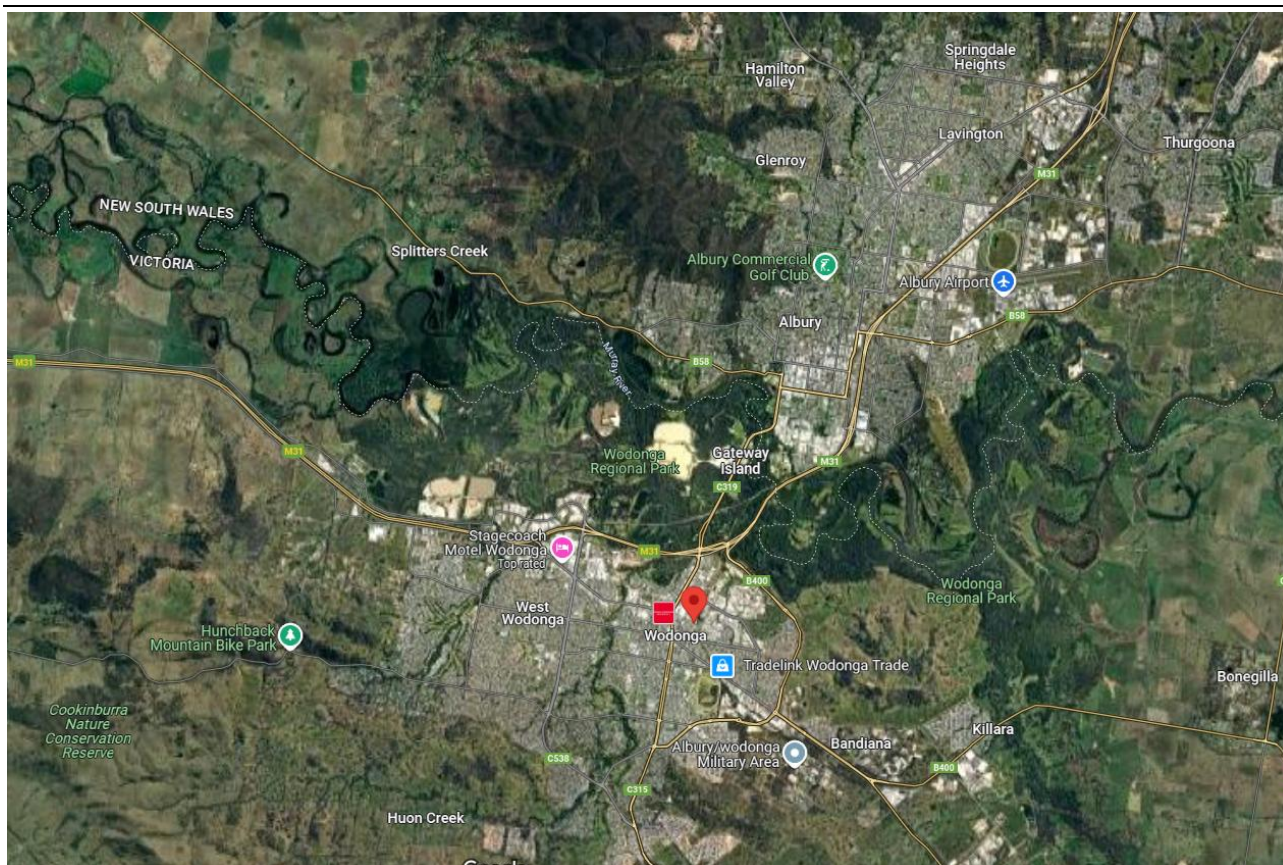
24. Accompanying this report is the following supporting documentation, the contents of which are discussed in detail throughout:
- Gaming Expenditure Report;
  - Harm Minimisation Report;
  - BSPN Architects Proposed Development Plans;
  - Patron Counts and Survey data (Hotel Bistro and Quest); and
  - Club Wodonga Gaming Policies and Procedures.

## 2 Location and Venue Operations

### 2.1 Location

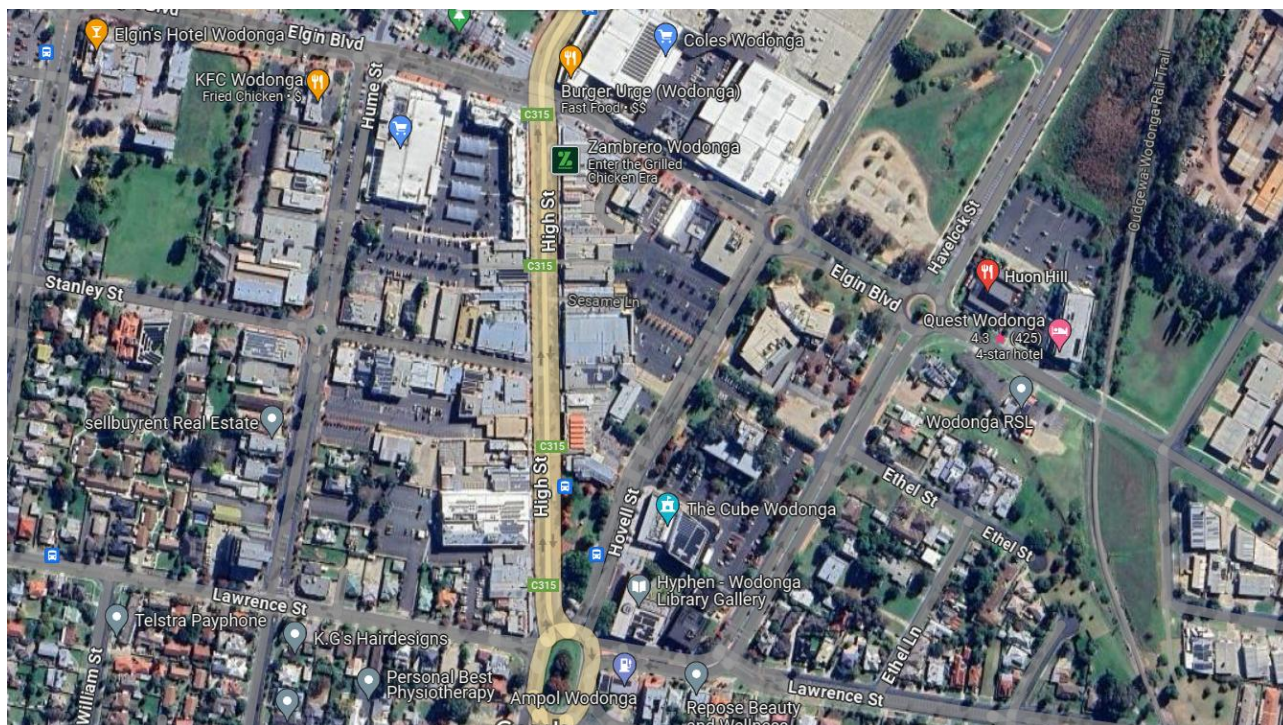
25. The Venue occupies the corner of Havelock and Reid Street in Wodonga. The site is formally known as 48 Reid Street, on the perimeter of the local commercial and business centre of the Wodonga township.
26. The City of Wodonga lies approximately 300km northeast of Melbourne and is considered a key regional city on the Victorian side of the Victoria-New South Wales border, comprising a total land area of 432.6 sqm,
27. Wodonga sits adjacent to Albury across the Murray River, forming the Albury-Wodonga urban area.

**Figure 1 |** Aerial image of the subject site (Wodonga) proximate neighbouring border town of Albury





**Figure 2 |** Aerial image of the subject site and surrounding land uses



28. The site's location is typical of the major venues in regional and rural communities, where such clubs or hotels are traditionally located at key intersections on the town's main roads.
29. The Venue is in relative proximity to other key local business hubs in the town including the RSL, Quest Apartments, the Police Station and legal precinct, and the municipal offices including Council and the Library. It is noted, however, that the subject site is separated from the CBD and not on what could reasonably be considered an 'ant-trail' to convenience uses within the CBD area. The immediate area is considered to be the entertainment precinct or hub in Wodonga.
30. The nearest licensed venue is the Wodonga RSL, located 90 metres from the premises. It operates under a club liquor licence and is available for member functions and event bookings. However, its regular trading hours are limited to Friday nights from 5:30 pm to 8:00 pm, when meals and drinks are available for purchase, and Thursday nights during a designated happy hour.
31. Also nearby is the Wodonga Bowling Club, approximately 170 metres from the premises. It also holds a club liquor licence and operates for functions, events, and weekly social bowls on Wednesdays, Thursdays, and Saturdays.
32. The Cube Wodonga, located 305 metres away, serves as a community and social hub and is home to Ploughman's Café, which operates from 7:00 am to 3:00 pm Tuesday to Saturday and 7:00 am to 2:00 pm on Sundays. The Cube also provides drinks and snacks from its bar during events, performances, and functions.



33. Other nearby venues include Miss Naked Cakes (250 metres), the Wodonga Senior Citizens Centre (335 metres), and the Wodonga Veterans and Families Hub (410 metres). The closest gaming venue is Elgin's Hotel Wodonga, located 750 metres from the premises, operating every day from 10:00 am until 3:00 am the following morning.

**Image 1 |** The Venue, from Elgin Blvd



**Image 2 |** Shared access with Quest Apartments off Elgin Boulevard





**Image 3 |** Skywalk access between the Venue and Quest Apartments (Venue services Quest with all hospitality services)



**Image 4 |** Aerial view of the Venue and immediate surrounds (RSL and carpark directly opposite off Elgin Boulevard)



## 2.2 Hours of Operation

34. The Venue currently operates to the following opening hours:

- Monday – Wednesday - 10am – 10pm;
- Thursday – 10am – 11pm; and
- Friday - Sunday: 10am – 1am.

- The proposed cafe will be a new addition to the Venue and will be open from 7am for breakfast and throughout the day thereafter until 1am whilst the gaming room remains open.
35. The Kitchen currently operates to the following hours:
- Monday – Sunday Lunch Hours: 12pm – 2pm;
  - Tuesday – Saturday Dinner: 6pm – 9pm; and
  - Sunday-Monday Dinner: 6pm – 8pm.
36. Food and drink will be available to future gaming patrons via the bistro and proposed café/lounge area during all operational hours.

Image 5 | View of the alfresco area





Image 6 | Main Bar servicing the Bistro



Image 7 | The bistro





Image 8 | The sports bar



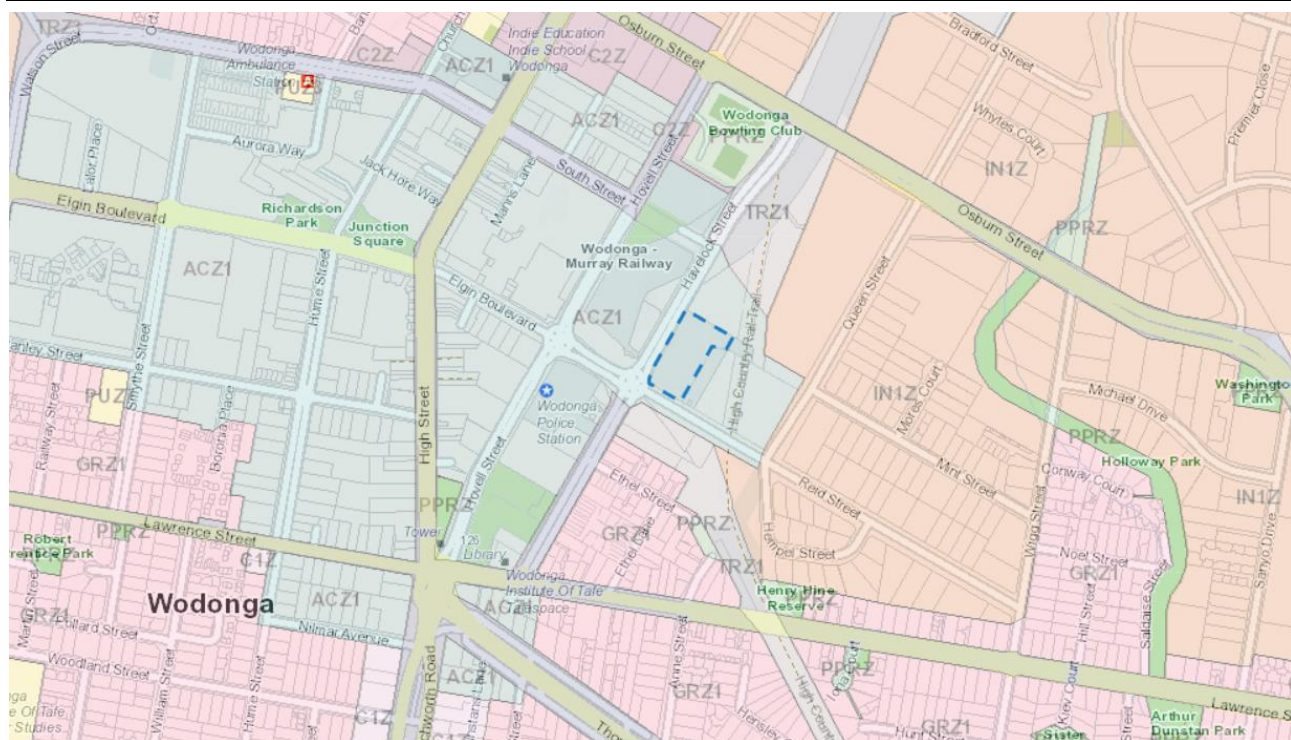
### 2.3 Current Employment at the Venue

37. The Venue currently employs 10 full time staff, with an additional 21 casual staff members. This is the current staffing levels while operating as a hotel and it equates to 17 FTE staff.
38. With the proposed changes and the creation of Club Wodonga together with the addition of gaming the anticipated employment of the Venue will increase to 23 full time equivalent (FTE) staff. A net increase of 6 FTE staff is a significant employment increase in a regional hospitality business as these positions are considered well-paying permanent, part-time and casual jobs compared to non-hospitality positions in the regions.
39. All employees working in the gaming room will be RSG qualified, suitably experienced and professionally trained by JDA Group management as well as the nominated VSW responsible for gaming venues within the Wodonga area. It is anticipated that at least 20 members of staff will be RSG qualified and working on Gaming Lounge shifts.
40. 80% of the Venue's current employees live in the local area (Albury or Wodonga), driving less than 6.2km for work. Of those that don't live within that radius 5 are born and bred locals that live on rural farms on the outskirts of Wodonga or Albury.

## 2.4 Zoning and Land Use

41. The site and immediate surrounds are located within an Activity Centre Zone – Schedule 1 (ACZ1), bordering a Transport Zone 1 - State Transport Infrastructure (TRZ1) and Industrial 1 Zone (IN1Z).
42. The Venue was approved by Council in 2012. Development took place during 2012-2013 and the Venue has traded successfully since 2013.
43. The Wodonga CBD and surrounding Activity Centre Zone has experienced positive growth, infill development and gentrification over the last decade since the Venue was approved and built. Land immediately surrounding the subject site remains largely undeveloped, with limited further development potential to the north and east of the site given the zoning constraints and industrial interface.
44. The extended area provides TRZ1 to the abutting north and abutting east, with IN1Z (Industrial) to the extended east as outlined in Figure 3 below. The site is effectively land locked to that extent in terms of encroaching development within the adjoining land holdings. The large land parcel to the immediate west of the Venue on the Havelock Street/Elgin Boulevard corner is zoned Activity Centre (ACZ1) and has development potential but is currently vacant and used for overflow CBD parking – see Image 13.

**Figure 3 | Zoning of the subject site and extended surrounds**





45. There are no sensitive uses or locations immediately surrounding the Venue, and the site was intentionally considered with this in mind. The nearest educational facilities are St Augustine's Primary School, located 520 metres north of the premises and outside the CBD/entertainment precinct, and Stanley Street Preschool, situated 560 metres to the west on the edge of the precinct near Hume Street. The closest drug and alcohol treatment service is Headspace/Gateway Health, located 390 metres west of the site on High Street, within the CBD/entertainment precinct.

**Image 9 |** Traditional Wodonga CBD strip



**Image 10 |** New development on the previously vacant railway land precinct – shows positive economic growth with modern development and attracting national businesses





**Image 11** | 'Mann Central' – part of the revitalised CBD improvements initiated by the new railway land development.



**Image 12** | The Quest and Huon Hill Hotel development form part of the high-quality rejuvenation of former railway land on the northern side of the Wodonga CBD



**Image 13** | Vacant gravel carpark on the only remaining large parcel of railway land directly opposite the Hotel to the west.



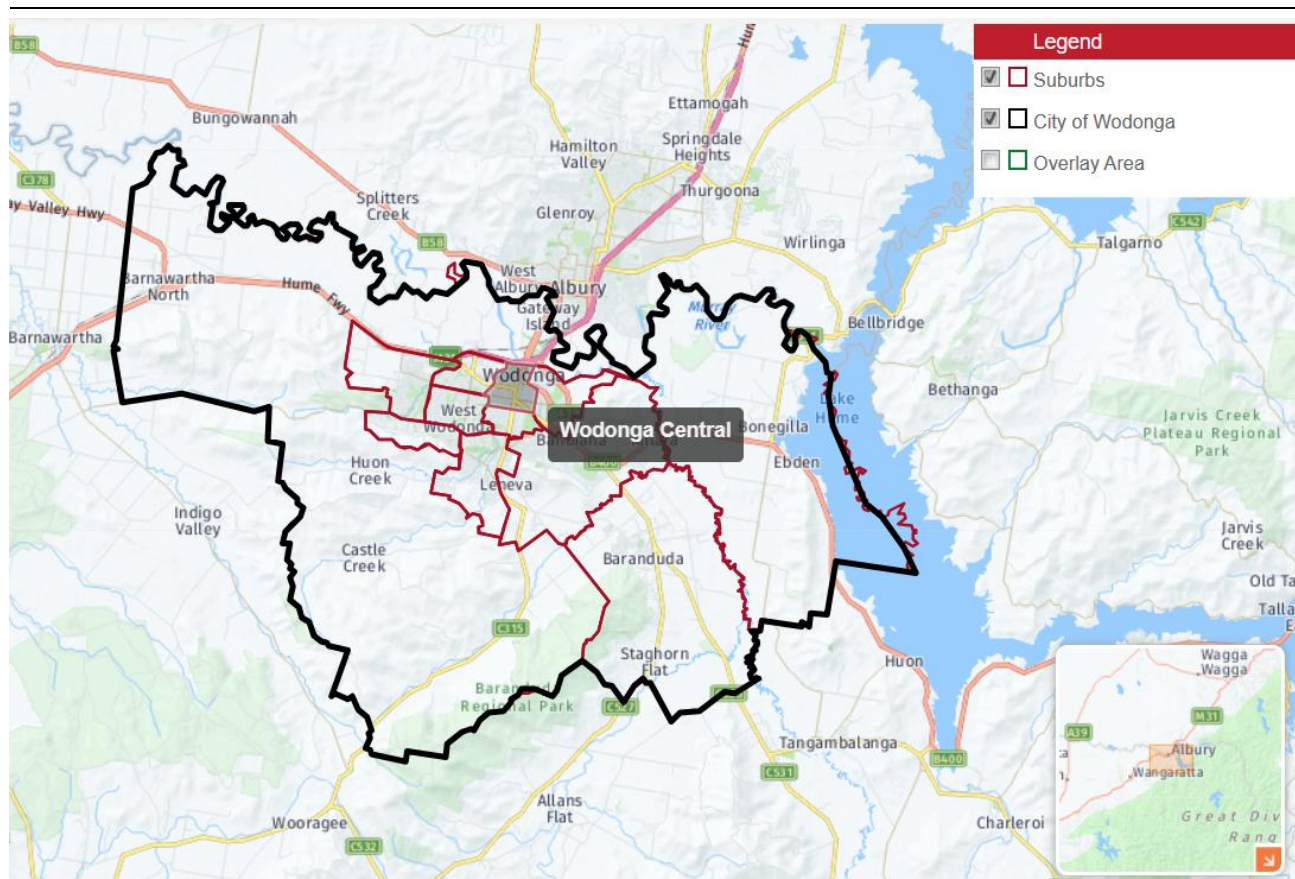


## 2.5 Social and Economic Profile of the Area

### 2.5.1 Residential Population in the Venue Catchment

46. The City of Wodonga is a regional catchment located near the NSW border in northeastern Victoria, approximately 300km from Melbourne. 2023 ABS population data recorded a population of 44,276 across 432.6 square kms.
47. Previous ABS ERP data for the City of Wodonga indicated a population of 43,253 in 2021, having increased from 39,351 as recorded in the previous census of 2016. The current (2023) population density stands at 102.3 persons per square km.

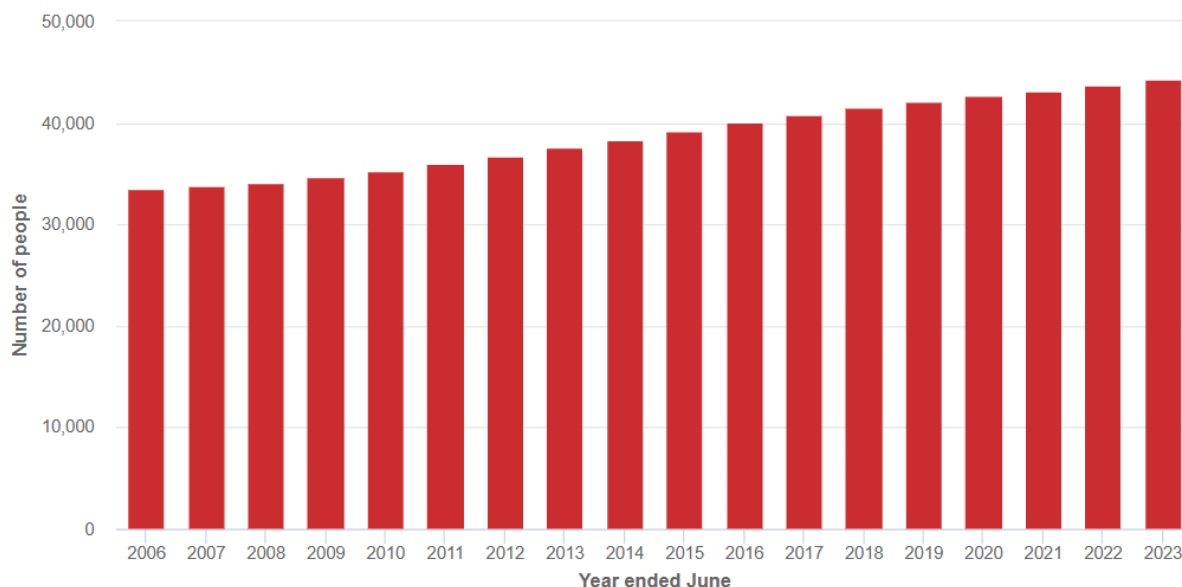
**Figure 4 | City of Wodonga boundaries<sup>1</sup>**



**Figure 5 |** Estimated Resident Population in the City of Wodonga<sup>2</sup>

## Estimated Resident Population (ERP)

City of Wodonga



**Figure 6 |** Change in ERP<sup>3</sup>

## Percentage change in ERP - City of Wodonga compared to Regional VIC



Source: Australian Bureau of Statistics, Regional Population Growth, Australia (3218.0). Compiled and presented by id (informed decisions)

<sup>2</sup> <https://profile.id.com.au/wodonga/population-estimate>

<sup>3</sup> <https://profile.id.com.au/wodonga/population-estimate>

## 2.5.2 Forecast Population

48. The City of Wodonga is forecast to grow to 52,414 by 2036. This population change sees an estimated growth of 21.33%, averaging 0.91% per annum.
49. The City of Wodonga has had a steady population growth trend since 2006, as evident in Figures 5 and 6 above.

## 2.5.3 Demographic Profile

50. The City of Wodonga exhibits a diverse socio-economic profile as reflected in the 2021 ABS census and Socio-Economic Indexes for Areas (SEIFA) data. The data measures the relative level of socio-economic position based on various Census characteristics, including income, education, employment, and housing.
51. The latest ABS census data determines Wodonga as comprising predominantly of family households.

**Figure 7 | Household composition in Wodonga city<sup>4</sup>**

<b>Household composition</b>						
<i>Occupied private dwellings (excl. visitor only and other non-classifiable households)</i>	<b>Wodonga</b>		<b>Victoria</b>		<b>Australia</b>	
		%		%		%
Family households	11,332	69.2	1,676,129	70.1	6,542,648	70.5
Single (or lone) person households	4,605	28.1	619,542	25.9	2,370,742	25.6
Group households	437	2.7	94,559	4.0	361,822	3.9

More information on [Household composition \(HHCD\)](#)

Table based on place of enumeration

**Figure 8 | Tenure type**

<b>Tenure type</b>						
<i>Occupied private dwellings (excl. visitor only and other non-classifiable households)</i>	<b>Wodonga</b>		<b>Victoria</b>		<b>Australia</b>	
		%		%		%
Owned outright	4,763	29.1	768,730	32.2	2,872,331	31.0
Owned with a mortgage (a)	5,691	34.8	862,658	36.1	3,242,449	35.0
Rented (b)	5,339	32.6	681,419	28.5	2,842,378	30.6
Other tenure type (c)	209	1.3	41,752	1.7	181,518	2.0
Tenure type not stated	371	2.3	35,676	1.5	136,538	1.5

(a) Includes dwellings purchased under a shared equity scheme.

(b) Excludes dwellings being occupied rent-free, this is not comparable to 2016 QuickStats data.

(c) Comprises dwellings occupied rent free, occupied under a life tenure scheme and other tenure type.

More information on [Tenure type \(TEND\)](#)

Table based on place of enumeration

<sup>4</sup> [2021 Wodonga, Census All persons QuickStats | Australian Bureau of Statistics \(abs.gov.au\)](#)

Figure 9 | Occupancy payments

<b>Rent weekly payments</b>						
<i>Occupied private dwellings (excl. visitor only and other non-classifiable households) being rented</i>						
	<b>Wodonga</b>		<b>Victoria</b>		<b>Australia</b>	
		<b>%</b>		<b>%</b>		<b>%</b>
Median rent (a)	290	N/A	370	N/A	375	N/A
Renter households where rent payments are less than or equal to 30% of household income (b)	3,464	64.9	413,492	60.7	1,667,080	58.7
Renter households with rent payments greater than 30% of household income (b)	1,414	26.5	210,437	30.9	915,317	32.2
Unable to determine (c)	465	8.7	57,493	8.4	259,992	9.1

(a) Median rent calculations exclude dwellings being occupied rent-free, this is not comparable to 2016 QuickStats data.

(b) This is not comparable with historical QuickStats, as applicable households included in this calculation have changed. For details on how Household income is derived please refer to [RAID](#).

(c) Unable to determine includes those households in which income and/or housing costs were not, or were only partially stated, by persons in the household.

More information on [Rent payments \(weekly\) \(RNTD\)](#), [Rent affordability indicator \(RAID\)](#)

Table based on place of enumeration

<b>Mortgage monthly repayments</b>						
<i>Occupied private dwellings (excl. visitor only and other non-classifiable households) owned with a mortgage or purchased under a shared equity scheme</i>						
	<b>Wodonga</b>		<b>Victoria</b>		<b>Australia</b>	
		<b>%</b>		<b>%</b>		<b>%</b>
Median mortgage repayments	1,479	N/A	1,859	N/A	1,863	N/A
Owner with mortgage households where mortgage repayments are less than or equal to 30% of household income (a)	4,527	79.5	637,758	73.9	2,398,902	74.0
Owner with mortgage households with mortgage repayments greater than 30% of household income (a)	610	10.7	133,287	15.5	468,817	14.5
Unable to determine (b)	557	9.8	91,606	10.6	374,734	11.6

(a) This is not comparable with historical QuickStats, as applicable households included in this calculation have changed. For details on how Household income is derived please refer to [MAID](#).

(b) Unable to determine includes those households in which income and/or housing costs were not, or were only partially stated, by persons in the household.

More information on [Mortgage repayments \(monthly\) \(MRED\)](#), [Mortgage affordability indicator \(MAID\)](#)

Table based on place of enumeration

52. Household incomes in Wodonga sit below that of state and national averages, although indicative of regional service centre townships and the associated social and economic advantage of the area as discussed elsewhere in this report.

Figure 10 | Wodonga City household income

<b>Household income</b>						
<i>Occupied private dwellings (excl. visitor only and other non-classifiable households)</i>						
	<b>Wodonga</b>		<b>Victoria</b>		<b>Australia</b>	
		<b>%</b>		<b>%</b>		<b>%</b>
Less than \$650 total household weekly income (a)	N/A	17.7	N/A	16.4	N/A	16.5
More than \$3,000 total household weekly income (a)	N/A	15.5	N/A	24.2	N/A	24.3

(a) Percentages (%) exclude dwellings with 'Partial income stated' or 'All incomes not stated.'

More information on [Total household income \(weekly\) \(HIND\)](#)

Table based on place of enumeration



**Figure 11 | Median weekly income**

<b>Median weekly incomes (a)</b> <i>People aged 15 years and over</i>	<b>Wodonga</b>	<b>%</b>	<b>Victoria</b>	<b>%</b>	<b>Australia</b>	<b>%</b>
Personal (b)	\$805	N/A	\$803	N/A	\$805	N/A
Family (c)	\$1,938	N/A	\$2,136	N/A	\$2,120	N/A
Household (d)	\$1,498	N/A	\$1,759	N/A	\$1,746	N/A

(a) Incomes are collected in ranges. The medians are then calculated using information from the Survey of Income and Housing.

(b) Excludes people aged 15 years and over who did not state their income.

(c) Excludes families where at least one family member aged 15 years and over did not state their income.

(d) Excludes households where at least one household member aged 15 years and over did not state their income.

More information on [Total personal income \(INCP\)](#), [Total family income \(FINF\)](#), [Total household income \(HIND\)](#)

Personal income data is based on place of usual residence

Family and household income data is based on place of enumeration

**Figure 12 | Labour force participation**

<b>Participation in the labour force</b> <i>People aged 15 years and over</i>	<b>Wodonga</b>	<b>%</b>	<b>Victoria</b>	<b>%</b>	<b>Australia</b>	<b>%</b>
In the labour force	21,594	62.5	3,330,560	62.4	12,695,853	61.1
Not in the labour force	11,283	32.6	1,719,644	32.2	6,888,081	33.1
Not stated	1,697	4.9	283,829	5.3	1,200,851	5.8

**Note 1:** Calculated percentages represent a proportion of people aged 15 and over in the area.

**Note 2:** The ABS Labour Force Survey provides the official estimates of Australia's labour force. More information is provided in [Comparing 2021 Census and Labour Force Survey](#).

More information on [Labour force status \(LFSP\)](#)

Table based on place of usual residence

**Figure 13 | Wodonga employment status**

<b>Employment status</b> <i>People who reported being in the labour force, aged 15 years and over</i>	<b>Wodonga</b>	<b>%</b>	<b>Victoria</b>	<b>%</b>	<b>Australia</b>	<b>%</b>
Worked full-time	12,545	58.1	1,871,278	56.2	7,095,103	55.9
Worked part-time	6,794	31.5	1,076,741	32.3	3,962,550	31.2
Away from work (a)	1,351	6.3	214,876	6.5	991,758	7.8
Unemployed	902	4.2	167,667	5.0	646,442	5.1

**Note 1:** Calculated percentages represent a proportion of people aged 15 and over who reported being in the labour force in the area.

**Note 2:** The ABS Labour Force Survey provides the official estimates of Australia's labour force. More information is provided in [Comparing 2021 Census and Labour Force Survey](#).

(a) Counts employed people who reported 0 hours of work the week before the Census or did not state their hours of work.

More information on [Labour force status \(LFSP\)](#)

Table based on place of usual residence

**Table 1 |** Demographic profile data<sup>5</sup>

	Wodonga %	Victoria %	Australia %
Median age	38	38	38
Male population	48.7	49.2	49.3
Female population	51.3	50.8	50.7
<b>Dwelling tenure</b>			
Own outright	29.1	32.2	31.0
Own with mortgage	34.8	31.6	35.0
Rent	32.6	28.5	30.6

53. Based on the above, it is reasonable to conclude that the City of Wodonga:

- Comprises largely of family households;
- Has more single (or lone person) households than state or national average;
- Overall demographic profile of the LGA is generally in line with state and regional averages;
- Community population is a relative spread of both men and women;
- Has similar levels of dwelling occupancy and ownership to the state and national average;
- Has a lower-than-average unemployment rate;
- Has more people working full time than the state and national average; and
- Has somewhat equal wage earners compared to state and national averages; with median personal weekly incomes sitting just above that of the state and national average, and household or family averages slightly lower.

#### 2.5.4 SEIFA Index

54. The Australian Bureau of Statistics (ABS) has compiled several indicia to reflect the social status of mapped areas of Australia, known as the SEIFA Index. One of these indexes is known as the Index of Relative Socio-Economic Advantage and Disadvantage (IRSAD). When compiling a comparison of the status of an area, the use of the IRSAD is preferred over the Index of Socio-Economic Disadvantage (IRSD) and this is explained by ABS:

**IRSAD:**

*This index is preferred in situations where the user:*

- *wants a general measure of advantage and disadvantage in their particular analysis*
- *is not looking at only disadvantage and lack of disadvantage*

<sup>5</sup> <https://www.abs.gov.au/census/find-census-data/quickstats/2021/LGA27170>

- *wants advantage to offset any disadvantage in an area.*

*An example would be where a user:*

- *considers the issue being examined to be affected by both advantage and disadvantage*
- *is analysing information that is not included in the index, such as home ownership.*

**IRSD:**

*This index is preferred in situations where the user:*

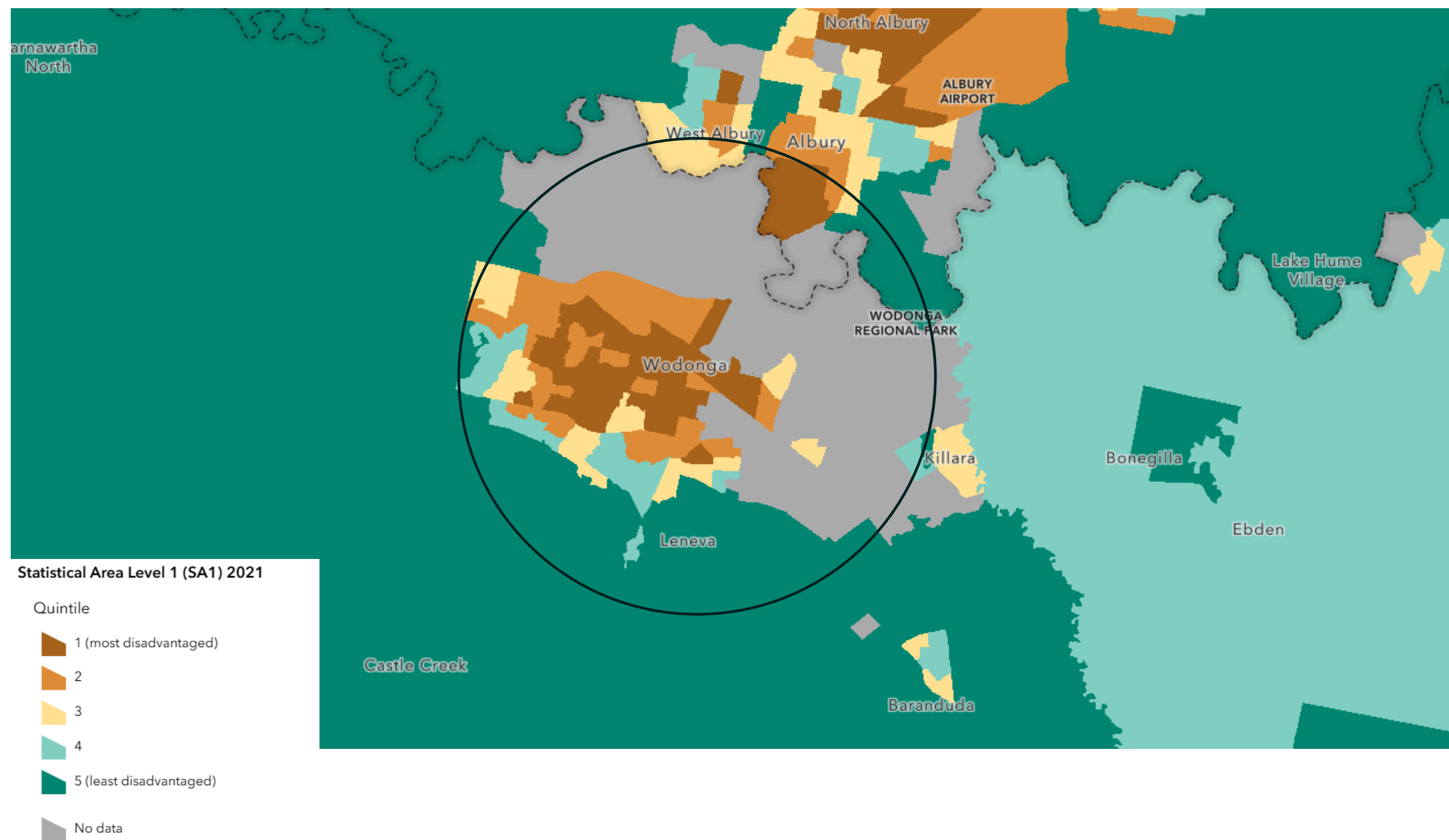
- *wants to look at disadvantage and lack of disadvantage*
- *wants a broad measure of disadvantage, rather than a specific measure (such as low income).*

*An example would be where a user:*

- *wants to ensure an allocation of funds goes to disadvantaged areas.*

55. The IRSAD is a more balanced review of a municipality, not simply by focusing on the disadvantages. However, standard protocol calls for the use of the IRSD, which is the measure used by the Commission and most Council's in their data collection. Therefore, this report shall reference the IRSD.
56. Figures 14 - 17 depict the Index of Relative Social Disadvantage for the City of Wodonga and surrounds, for both a 5km and 20km radii catchment.

**Figure 14 | IRSD SEIFA Mapping at SA1 Level with approximate 5km radii indicated <sup>6</sup>**



<sup>6</sup> IRSD | Socio-Economic Indexes for Areas (SEIFA), Australia 2021 ([arcgis.com](https://arcgis.com))

Figure 15 | IRSD SEIFA Mapping at SA1 Level with approximate 20km radii indicated <sup>7</sup>



<sup>7</sup> [IRSD | Socio-Economic Indexes for Areas \(SEIFA\), Australia 2021 \(arcgis.com\)](https://www.arcgis.com/home/item.html?id=72f319782d4847609936921177600000)

**Statistical Area Level 2 (SA2) 2021**

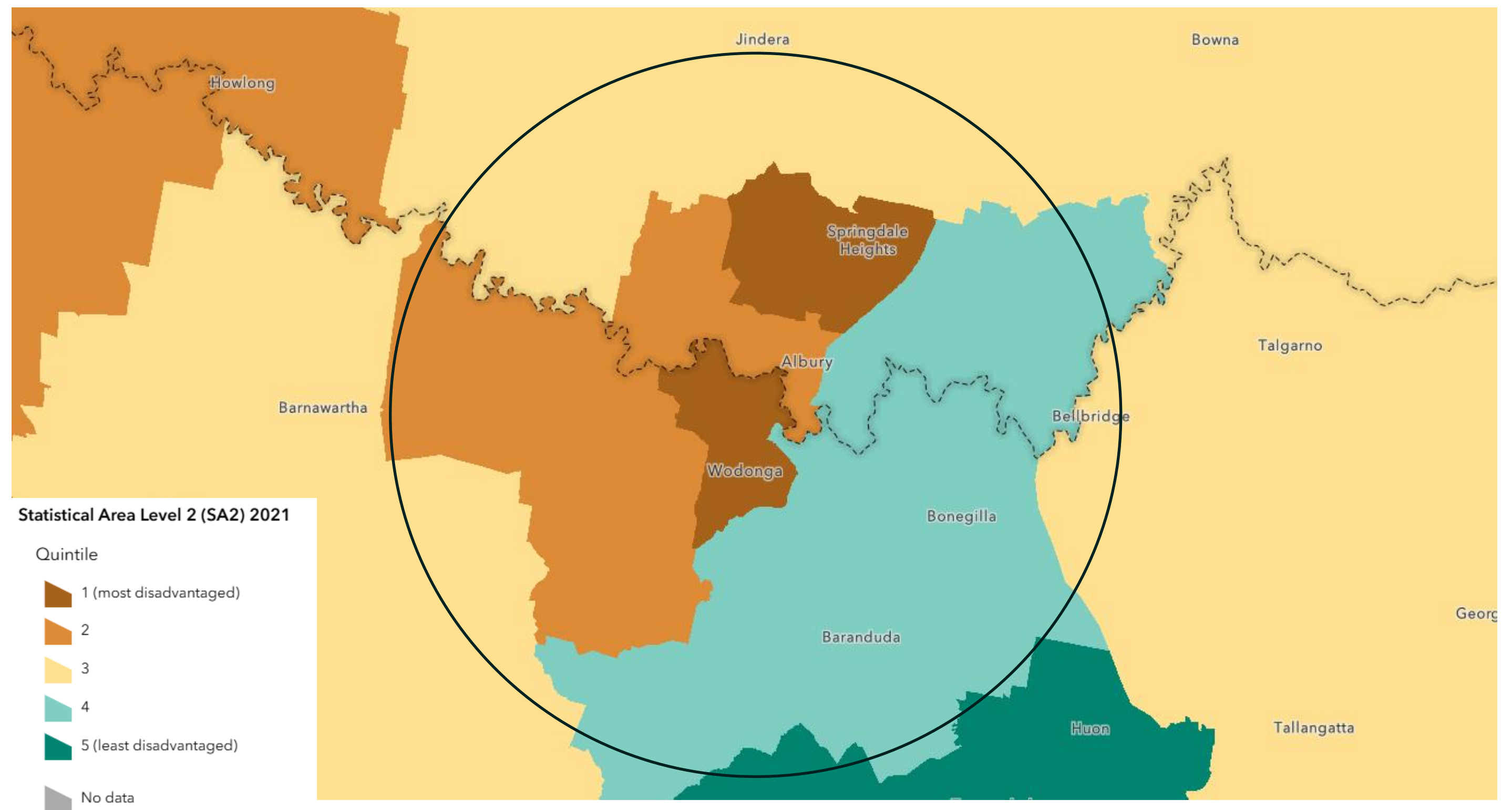
Quintile

- 1 (most disadvantaged)
- 2
- 3
- 4
- 5 (least disadvantaged)
- No data

[nbagoup.com.au](http://nbagoup.com.au)



**Figure 17 | IRSD SEIFA Mapping at SA2 Level with approximate 20km radii indicated<sup>9</sup>**



<sup>9</sup> IRSD | Socio-Economic Indexes for Areas (SEIFA), Australia 2021 ([arcgis.com](#))

57. In 2021, the City of Wodonga recorded an IRSD score of 973.1, positioning it in the 28th percentile nationally. This indicates that approximately 72% of Australian suburbs have a higher socio-economic status, while 28% are more disadvantaged.
58. The state's average IRSD score is 1,010.0, placing it in the 48th percentile. Wodonga's score is below this average, indicating a higher level of disadvantage compared to the broader state context.
59. Nationally, the average IRSD score is 1,001.2, corresponding to the 42nd percentile. Wodonga's score is also below the national average suggesting a relatively higher level of socio-economic disadvantage.

**Table 2 |** Index of Relative Socio-economic Disadvantage<sup>10</sup>

Area	2021 Index	Percentile
<i>Wodonga Central</i>	889.1	8
City of Wodonga	973.1	28
Regional Victoria	985.0	33
Victoria	1,010.0	48
Australia	1,001.2	42

60. Based on the 2021 Socio-Economic Indexes for Areas (SEIFA) data from the Australian Bureau of Statistics (ABS), listed in Table 3 below are all Victorian Local Government Areas (LGAs) ranked by their Index of Relative Socio-economic Disadvantage (IRSD) scores.
61. In summary it is reasonable to conclude that:
  - Wodonga presents as a typical regional service centre town;
  - The overall LGA socio-economic profile is not within the lowest 25% of the state;
  - A number of the key indicators are trending upwards over the last 3 census periods;
  - Income levels, mortgage stress levels and household profiles are unremarkable when compared with similar sized towns and regional LGA's in Victoria; and
  - The recent Wodonga CBD rejuvenation facilitated by Council and land developers has had a noticeable positive impact on the profile and perception of the Wodonga CBD and former Railway precinct. In particular, diversity in employment opportunities now exist, which is not a common characteristic in larger regional areas post-covid.

<sup>10</sup> [SEIFA by profile area | City of Wodonga | Community profile \(id.com.au\)](https://profile.id.com.au/wodonga/seifa-disadvantage-small-area)  
<https://profile.id.com.au/wodonga/seifa-disadvantage-small-area>



**Table 3 |** LGA Rankings based on IRSD Score

LGA	Score SCORE	Rank within Australia RANK	Rank within State or Territory RANK	Rank within State or Territory - Decile RANK_DC
• • Nillumbik	1,093	535	80	10
• • Bayside (Vic.)	1,090	533	79	10
• • Boroondara	1,090	532	78	10
• • Surf Coast	1,086	530	77	10
• • Stonnington	1,084	529	76	10
• • Queenscliffe	1,082	527	75	10
• • Glen Eira	1,075	517	74	10
• • Macedon Ranges	1,063	506	73	10
• • Port Phillip	1,061	503	72	9
• • Banyule	1,058	500	71	9
• • Manningham	1,056	497	70	9
• • Yarra	1,046	489	69	9
• • Kingston (Vic.)	1,044	481	68	9
• • Whitehorse	1,043	479	67	9
• • Monash	1,042	478	66	9
• • Knox	1,042	476	65	9
• • Yarra Ranges	1,041	475	64	8
• • Maroondah	1,041	474	63	8
• • Moonee Valley	1,041	472	62	8
• • Golden Plains	1,040	470	61	8
• • Mornington Peninsula	1,038	466	60	8
• • Indigo	1,029	450	59	8
• • Moyne	1,029	449	58	8
• • Mansfield	1,028	444	57	8
• • Alpine	1,028	443	56	7
• • Moreland	1,027	438	55	7
• • Cardinia	1,021	424	54	7
• • Hobsons Bay	1,021	422	53	7
• • Darebin	1,018	417	52	7
• • Moorabool	1,017	415	51	7
• • Melbourne	1,017	414	50	7
• • Maribyrnong	1,010	401	48	6
• • Mount Alexander	1,007	391	47	6
• • Greater Geelong	1,007	390	46	6
• • Hepburn	1,006	388	45	6
• • Wyndham	1,006	385	44	6
• • Murrindindi	1,005	382	43	6

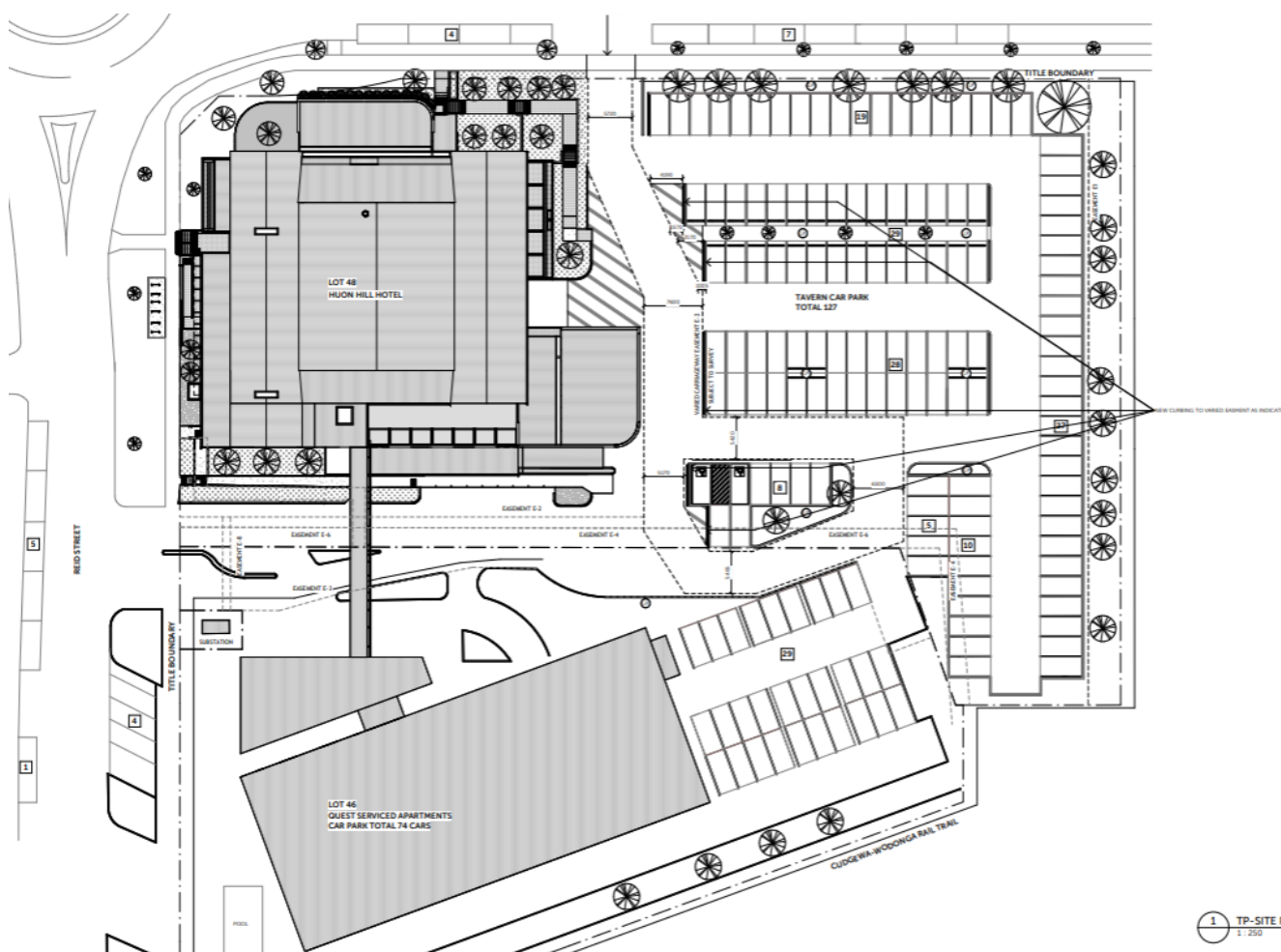
• • Baw Baw	1,003	377	42	6
• • Frankston	1,003	375	41	6
• • South Gippsland	1,003	372	40	5
• • Towong	1,001	368	39	5
• • Mitchell	1,000	363	38	5
• • Warrnambool	995	347	37	5
• • Casey	995	343	36	5
• • Southern Grampians	994	339	35	5
• • Bass Coast	993	336	34	5
• • West Wimmera	991	326	33	5
• • Horsham	990	324	32	4
• • Whittlesea	990	320	31	4
• • Wangaratta	988	312	30	4
• • Ballarat	986	300	29	4
• • Melton	985	298	28	4
• • Greater Bendigo	985	296	27	4
• • Corangamite	985	293	26	4
• • Strathbogie	982	286	25	4
• • Buloke	975	260	24	3
• • Wodonga	973	250	23	3
• • Wellington	973	249	22	3
• • Colac Otway	973	248	21	3
• • Benalla	968	234	20	3
• • Campaspe	965	218	19	3
• • East Gippsland	963	212	18	3
• • Pyrenees	959	192	17	3
• • Moira	958	190	16	2
• • Ararat	955	181	15	2
• • Gannawarra	952	171	14	2
• • Glenelg	952	170	13	2
• • Northern Grampians	951	166	12	2
• • Loddon	948	156	11	2
• • Yarriambiack	946	149	10	2
• • Greater Shepparton	944	146	9	2
• • Hume	941	135	8	1
• • Swan Hill	941	134	7	1
• • Hindmarsh	940	132	6	1
• • Mildura	940	131	5	1
• • Latrobe (Vic.)	931	114	4	1
• • Brimbank	912	84	3	1
• • Central Goldfields	898	61	2	1
• • Greater Dandenong	887	55	1	1

### 3 The Proposal

#### 3.1 The Applicant

62. The Venue is to be operated by Huon Hill Club Ltd (the Applicant), and is located at 48 Reid Street, Wodonga. The Venue does not currently operate Electronic Gaming Machines (EGMs).
63. Huon Hill Club Ltd (the Club) has been created as a company limited by guarantee to trade as Club Wodonga. The objects of the Club are charitable in nature and are enclosed at Appendix 7. The freehold has been purchased and is owned by JDA Victorian Investments Pty Ltd Trustee for JDA Victorian Investments Family Trust and the Club will be managed by JDA Management Services (Victoria) Pty Ltd Trustee for the JDA Management Services (Victoria) Trust which is an experienced hospitality operator. The Venue is currently operated by Wodonga Nominees Pty Ltd as a hotel, but the hotel will convert to the ownership of Huon Hill Club Ltd trading as Club Wodonga once club status is achieved.

**Figure 18 | Proposed Site Plan**



### 3.2 Expenditure on Capital Works

64. The proposed buildings and works are to be provided at an estimated cost of \$6m.
65. The Feros family are experienced hospitality operators and as such they are proposing a major refurbishment of the existing venue to facilitate the establishment of Club Wodonga. Significant changes include:
- Reconfigured upper-level floorplan layout to facilitate an expanded sports bar with indoor and outdoor entertainment areas; a new kids play area; additional enclosed terrace dining areas; a new TAB area; enhanced Function Room facilities and bar offerings and reconfigured DOSA areas.
  - New lower-level café, alfresco dining and lounge.
  - New lower-level gaming lounge with 70 EGMs, breakout lounge and DOSA; and
  - Reconfigured access, parking and loading dock to accommodate the proposed lower-level works.

### 3.3 Existing Facilities

66. The Venue currently plays a prominent role within the community, attracting a range of local customers, visitors to the region and guests staying at the Quest Apartments. The diversity of the Venue's patron profile is supported by information provided at Appendix 6 and discussed further in Section 4.4 of this report.
67. Facilities currently available at the Venue include:
- Bar; bistro; sports bar; children's play area; function room(s); informal lounge areas; and alfresco dining areas.
  - The Venue currently provides an informal food and beverage offering to Quest guests.
68. The Venue has become an established destination within the local community since opening in 2014. Mr William Perry established and built the Huon Hill Hotel fully aware of the needs of the local community having been born and bred in the Wodonga area.
69. Mr Perry's vision was to create a community venue of a high-quality offering and able to fill gaps that existed in the Wodonga community and also retain customers for all aspects of hospitality on the Victorian side of the border. Currently there are a number of venues in Albury which are larger and more appealing and this has been a constant and ongoing vision for Mr Perry.
70. Due to health, age, and other interests, Mr Perry was not able to fulfil his vision. However, his desire to see the vision realised remained and accordingly Mr. Perry set about sourcing an appropriate operator to carry out the same.

71. An established, generational family operator in NSW was recommended and sourced for Mr Perry. The Feros family were introduced and the alignment between the Feros family who operate as JDA in NSW and Queensland and Mr Perry was mutual from the outset.
72. The Feros family envisage focusing on this foundation, and since taking over the Venue they have been proactive within the community by initiating the following enhancements to what the Venue was already offering the community (list provided by the Feros family):
  - A shift has been made to a more family focussed/inclusive venue. Kids' ages no longer make up part of the booking process. Kids activities and involvements have become an important part of the business;
  - Steps towards a family friendly venue include but are not limited to:
    - A kids menu at a reduced prices inclusive of dessert;
    - School activities ranging from pizza making with chef John, face painting, plaster painting, slime making, movie days with popcorn and snacks;
    - Kids Halloween and Christmas parties with special guest "Santa", presents for the kids, Halloween photos in front of green screen with choice of back drop; and
    - A room dedicated to kids arcade games, TV, kids toys including an adjoining balcony where parents can watch their kids in peace outside of the room.
  - Promotions for the local Australian Defence Force personnel and family. At any time, the local ADF can show their ID and receive 20% off food for them and their families;
  - Additionally, there is happy hour and free pool on a Thursday night for anyone that shows their Defence ID;
  - Senior menu has been implemented – reduced meals at all times for anyone who holds a Victorian Seniors Card;
  - Inclusion to bring your dog into the venue with specific dog friendly areas;
  - Daily promotions to help local members with cost of living – i.e. weekday food specials, nightly food promos, daily happy hours;
  - Inclusion of events - 18<sup>th</sup>'s (though on a base-to-base enquiry), 21<sup>st</sup>, baby showers, gender reveals, trade events, engagements etc.;
  - The encouragement of local clubs to hold their presentation nights at the Venue;
  - The re-implementation of full TAB facilities including Foxtel; and
  - The encouragement and support of major local events – i.e. the official afterparty of the Wodonga Gold Cup
73. In relation to the kids play area, it is noted this will be located on an entirely different floor to the gaming area, and in accordance with VGCCC guidelines and legislative requirements:
  - Will have no line of sight from or into the gaming area;
  - Is not accessible from the gaming area;
  - Is in full view of the Bistro dining area where venue staff can monitor the play area, alongside responsible guardians of the children, to ensure no minors are left unattended; and



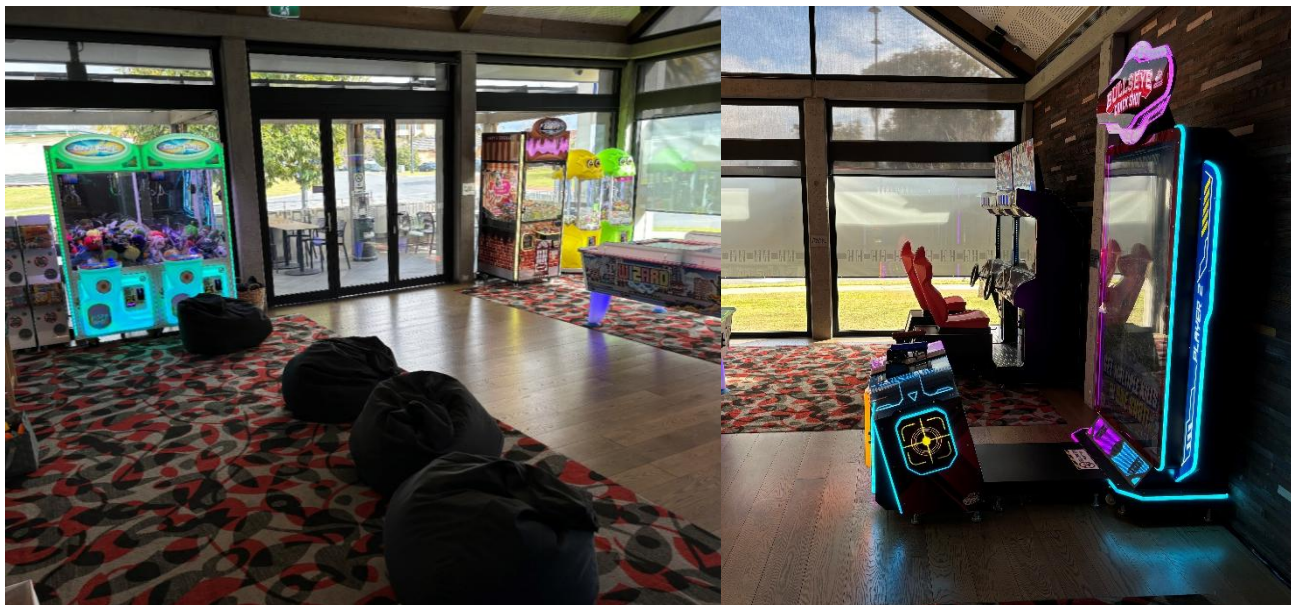
- No sounds from the gaming machine area, including sounds of EGMs, can be heard from the kids play area.
74. Should the proposed buildings and works, including the introduction of the 70 EGM gaming lounge be approved, the Feros family intend to further expand upon, and formalise, a much broader range of community focussed contributions in the form of the Club Wodonga community contributions scheme outlined in the next section of this report.
75. Whilst operating completely independently of each other, the Venue and the Quest Apartments essentially 'share' the subject site in the sense that they share access points and were basically designed and built as an integrated development. The Venue provides food and beverage services to Quest guests, access is provided from Quest to the Venue via an elevated weather-proof walkway, functions are co-ordinated between the venues for food, beverage and accommodation packages and the respective management groups work collaboratively to capitalise on the services offered by each business.
76. Importantly, there are no permanent dwellings or residential accommodation offerings at the Quest. All apartments are motel-style rooms ranging from studio, one bed, 2 bed and a small number of 3-bedroom apartments for larger group bookings. Quest management advise that the vast majority of bookings are short-stays ranging between 1 and 3 nights for tourists, visitors travelling for work purposes and visitors attending events in Wodonga or its immediate surrounds.

**Image 14** | Sports Bar area has modern fixtures and fittings





**Image 15** | Children's play area with quality games of skill and play equipment



**Image 16** | Looking south from the Hotel carpark to Quest on the eastern title that used to form part of the Venue block



Image 17 | Elevated skywalk link between Quest and the Venue.



### 3.4 Ongoing Employment

77. The Venue current employs 10 full-time and 21 casual staff for an FTE staff headcount of 17 currently.
78. Should the proposal be approved the Venue anticipates that it will be required to increase the current staffing to 23 FTE to operate the existing and proposed new facilities onsite. The increased employment will be due to a larger facility to service, an increased hospitality offering including gaming, cafe and larger sports bar area, together with targeted focus on larger functions in the upgraded functions space(s). Also, the fact that club gaming venues (as distinct to hotel gaming venues) require guests to sign-in and trigger substantial responsible service of gambling measures to be implemented there is also an increased need for increased specialist RSG qualified employment in the Venue.
79. As outlined earlier in this report, the net result will be six (6) FTE jobs at the Venue should the proposal be approved.

### 3.5 Supply Contracts

80. The Venue currently supports a number of local suppliers and trades as outlined in Table 4 below. The Feros family acknowledge that whilst they have a bigger pool of suppliers to pull from within their Sydney branches, they felt it was important to continue and grow the usage of local suppliers and trades.



81. Having also recently purchased a Hotel in Deniliquin (NSW) they have committed to working with local suppliers wherever possible and the experience is looking to be replicated in Wodonga.
82. At the time of writing this report, the Feros family have been unable to accurately determine the estimated value of supply contracts over the first twelve months. A full list of local supplier and trade contracts is provided in Table 4 below.

**Table 4 |** Local Suppliers and Trades

<b>Kitchen</b>	-	Locky’s countryside meats (Albury)	<b>Alcohol</b>	-	Bridge Road Brewers
	-	Kennedys meats (Wodonga)		-	Campbells Wines
	-	Albury wholesale chickens (Albury)		-	Pizzini Wines
	-	Arnolds fruit & vegetables (Wodonga)			
	-	Superior foods (Albury)			
<b>Local Business</b>	-	PartyOz Entertainment- DJs and Live acts	<b>Local Trades</b>	-	Inline plant scapes- Plants and garden maintenance
	-	Essential utensil- Catering equipment		-	Zeale- Audio Visual
	-	Epik Enterprise/Questionable entertainment- Trivia and photographer		-	Cowan Controls- Aircon system
	-	Enhance styling and events- Wedding hire, cloths, napkins etc.		-	M Force Security
				-	Kym Arnold Beer tech
	-	RBR Party Hire- Event hire and catering equipmen		-	Twin City roller doors
				-	Wodonga Laundry
	-	Season to taste- Local small business that specialises in gourmet foods and culinary equipment		-	Burtens Locksmiths
				-	Airmaster- Fire system
				-	Tonkin Group- Electrical and Plumbing
				-	DLG Glazing
				-	High Voltage Systems (Kids amusements)

83. Of the estimated \$6m in proposed buildings and works the Feros family advise that they anticipate that the majority will be awarded to local contractors based on preliminary discussions between the Feros family, BSPN Architects and local trades. This will be subject to a local tender process to ensure that the relevant skills, expertise and resources are available locally, but early indications are that the majority, if not all, of the projected \$6m will be able to be spent locally.

### 3.6 Complementary Expenditure

84. The Feros family advise that all of the proposed \$6m in capital expenditure on buildings and works will be invested in one single-stage building process should the proposal be approved. If the gaming component of the proposal is not supported by the Council and/or the VGCCC none of the proposed capital expenditure will be required as the proposed works will not be undertaken as proposed.
85. As part of the proposed development, a new café/lounge area will be established and open to the public, encouraging greater foot traffic and increasing non-gaming expenditure on food and beverages. The café will operate from breakfast through to the evening while the gaming room is open, providing both gaming and non-gaming patrons with a welcoming social space. Featuring an internal lounge and outdoor alfresco dining area, the café will offer food, drinks, and snacks—supporting overall increased sales at the Venue. The café will also enable the Venue to offer a breakfast service to the Quest guests and locals alike.

### 3.7 Community Contributions

86. The proposed Club, which is Huon Hill Club Ltd trading as Club Wodonga, has a set of charitable objects which clearly outline the intention of the Club (refer to Appendix 7). The Club will be a not-for-profit organisation which will funnel funds back into the community as required. A proposed financial forecast has been prepared on the basis of liquor, food and gaming with 70 machines, and it is anticipated that up to \$250,000.00 in the first year will be available. Thereafter it is expected that profits will increase, and community contributions therefore will follow.
87. The Club sees itself establishing a more prominent role in the Wodonga community, more in line with the well-established larger community focussed clubs across the border in NSW (Albury). As such, it is committed to establishing a prescribed community contributions fund to a total value of \$150k cash per annum and a guaranteed minimum \$50k in-kind per annum. The program, proposed to be known as 'The Club Wodonga Community Fund' will be made up of a prescribed \$100k cash per annum to be allocated to nominated local community groups and a 'floating' \$50k per annum for special events, one-off community requirements or local disasters (floods/fire etc), as well as a guaranteed minimum \$50k in-kind contribution.
88. The Club Wodonga Community Fund has been specifically designed based on best-of-breed programs of a similar nature accepted by the VGCCC and implemented by a number of regional Victorian 'club' venues since gaming was introduced into Victoria in the 1990's. Over that period of time community contributions programs have been required to organically evolve as the gambling regulations changed and as such it is considered that this proposed program is the best way to ensure that the broadest range of community groups are supported in a transparent and equitable manner.

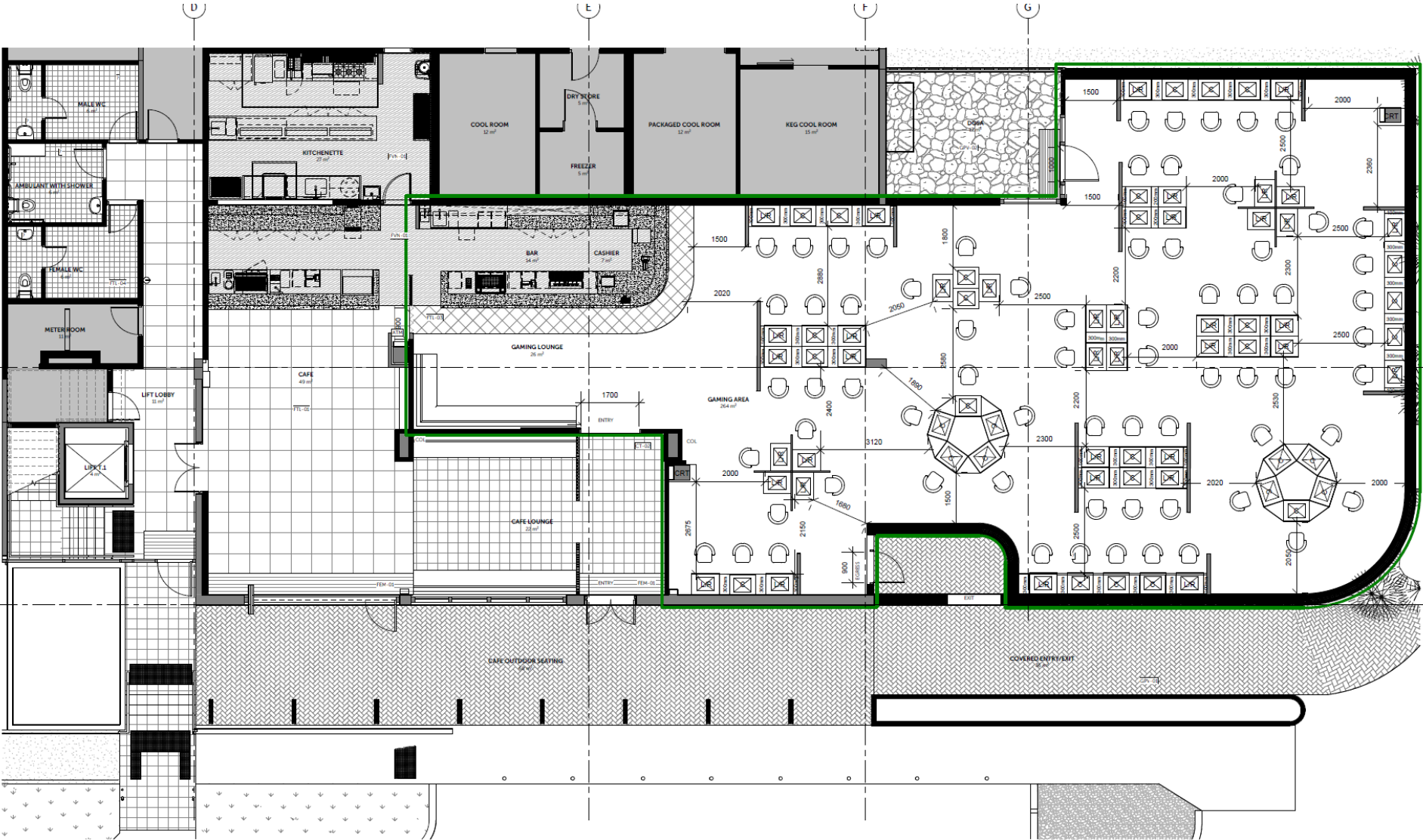
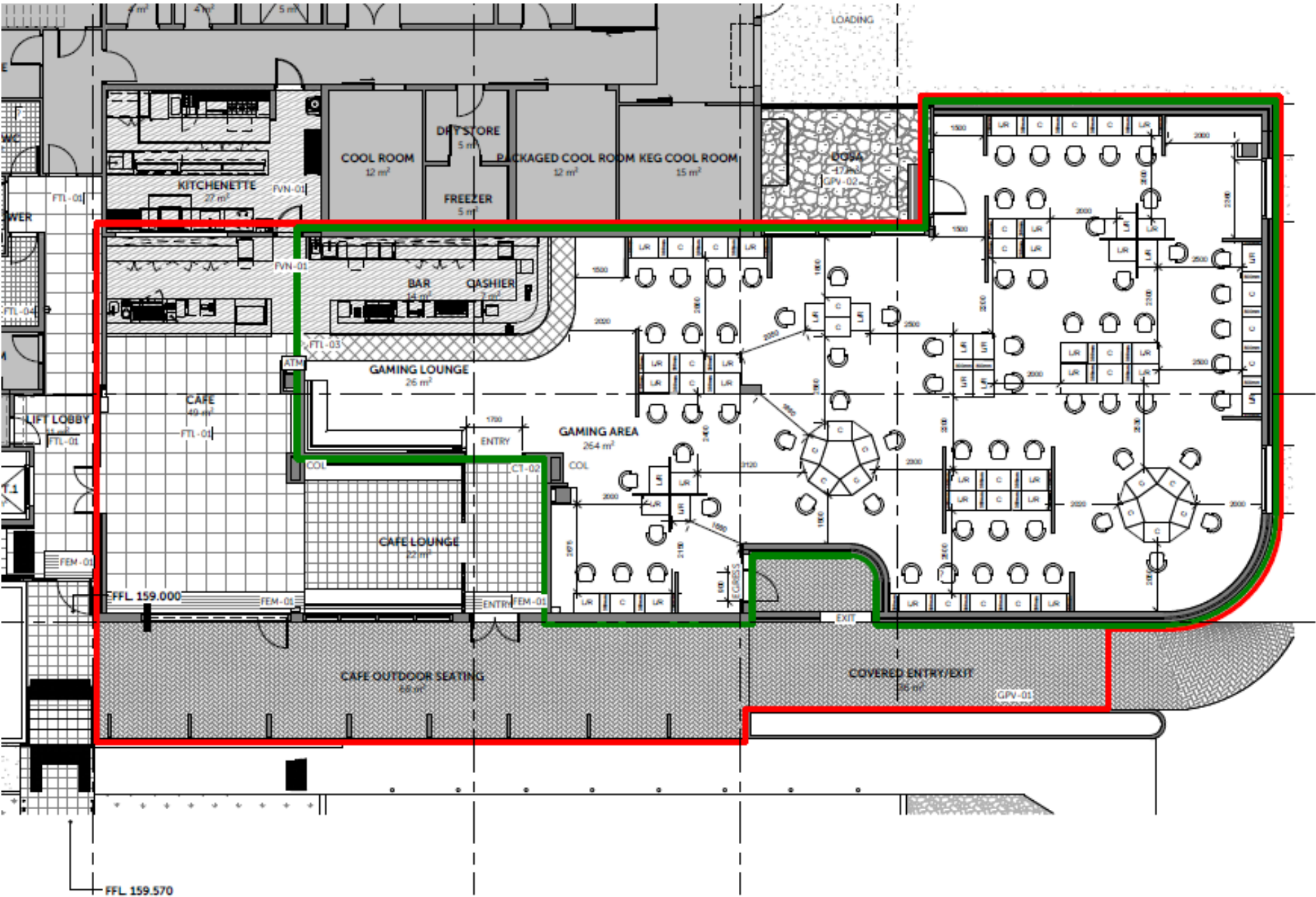
89. The proposed contributions program and its inaugural beneficiaries will only be able to formalised once the proposed 70 EGM Gaming Lounge is approved and operational, however, based on preliminary discussions with Council to determine the extent of community groups to include, it is anticipated that the Club Wodonga Community Fund, in Year 1 of its implementation, will look similar to the example outlined in Table 5 below.

**Table 5 |** Proposed Club Wodonga Community Fund – Year 1

Community Contributions	
<b>100k per annum</b>	<ul style="list-style-type: none"> <li>- Local Junior Football Clubs and Auskick</li> <li>- Wodonga Boys to the Bush program</li> <li>- Local Junior Cricket Clubs and Big Blast</li> <li>- Wodonga Veterans Hub (RSL and Vietnam Vets)</li> <li>- Local Football/Cricket/Soccer/Basketball Umpires Associations</li> <li>- Annual Gay Pride Festival</li> <li>- Wodonga Men's Shed Program</li> <li>- Betty's Place (emergency housing &amp; shelter)</li> <li>- Wodonga CFA</li> <li>- Wodonga Raiders Football Netball Club</li> <li>- Wodonga Bulldogs Football Netball Club</li> <li>- Wodonga Warriors Baseball/Softball</li> <li>- Yes Unlimited (youth in hospitality)</li> <li>- Farmers Markets/Car Shows/Fund Raising Events</li> <li>- Other Community Groups to be Nominated by C'tee</li> </ul>
<b>50k per annum</b>	<ul style="list-style-type: none"> <li>- Wodonga Youth Scholarship Program to support local talent: <i>based on submissions and nominations reviewed on case-by-case basis</i></li> <li>- Wodonga Community Event Fund: <i>annual contribution towards local events or community efforts to be decided by the Board in consultation with Council</i></li> <li>- Ad Hoc Club Wodonga Cash Fund: <i>annual contribution to go towards supporting one-off requests for support and/or emergency assistance for local community groups or Club Wodonga members (ie. uniforms, banners, signage, equipment)</i></li> </ul>
<b>In-Kind Community Contributions</b> <i>agreed guaranteed minimum allocation</i>	<ul style="list-style-type: none"> <li>- Vouchers to schools, kindergartens, raffles et al.</li> <li>- Member discounts</li> <li>- Meal deals</li> <li>- Discounted or Free venue hire</li> <li>- Live entertainment</li> </ul>



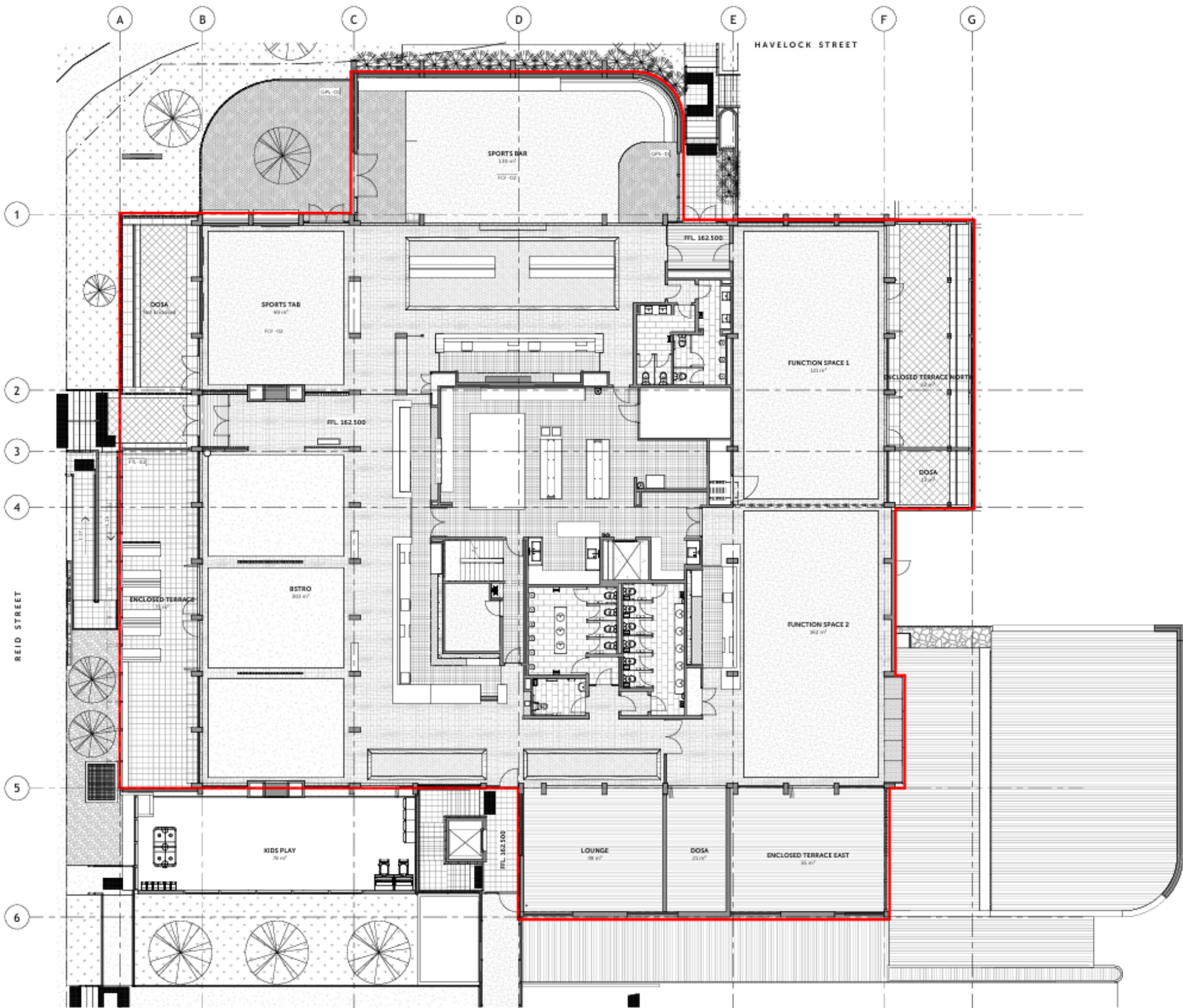
Figure 19 | Proposed Red and Green Line Plan – Lower Ground Floor – Gaming Lounge Plan shows fully compliant 70 EGM layout



1 GREEN LINE PLAN LOWER GROUND  
1:50



Figure 20 | Proposed Red Line Plan –Ground Floor



## 4 Impact Analysis

---

### 4.1 Overview

90. It is anticipated that the introduction of 70 EGMs to the Venue will have a minimal overall impact on central Wodonga and the greater city catchment area, given the existing presence of 3 gaming venues in Wodonga and the reality that some 1150 EGMs exist within this venue catchment, in Albury (NSW), on the other side of the Murray River and have done so since well before EGM gaming was legalised in Victoria.
91. To that extent, this region has had long-term exposure to EGM gaming and the proposal will not be introducing anything unfamiliar to the local community. What will be new is the Club Wodonga concept and the community focus of the Club, which will be distinctly different to existing Hotel venues operating within the accepted 5km venue gaming catchment.

### 4.2 2017 Gaming Cap Review

92. In the 2017 Gaming Review Cap, the Minister for Consumer Affairs, Gaming and Liquor Regulation announced a number of changes to regional caps and municipal limits on gaming machine entitlements, which came into effect November 3<sup>rd</sup>, 2017.
93. The resulting Ministerial Order determined of a total of 25 capped regions in Victoria, whereby any area not covered by a regional cap would have a municipal limit applied, establishing a maximum permissible limit of gaming machine entitlements.
94. These changes were designed to reduce the concentration of gaming machines in areas at higher risk of gambling-related harm.
95. Prior to the Gaming Cap Review, the City of Wodonga was permitted to operate 304<sup>11</sup> machines under section 3.4A(3A)(b) of the Gambling Regulation Act 2003. The review saw no change to this.
96. It is noted that the addition on these 70 EGMs leaves the total number of operating EGMs below the maximum permitted which is the number that has been deemed acceptable and appropriate for the population. This is also the population centre of the LGA.
97. Ongoing discussions have resulted in some minor adjustments since 2017, however there have been no further significant changes to the gaming machine caps and limits.

---

<sup>11</sup> [Gaming machine regional caps and limits | Victorian Gambling and Casino Control Commission \(vgccc.vic.gov.au\)](https://vgccc.vic.gov.au/Gaming-machine-regional-caps-and-limits)



### 4.3 Existing Venues and EGM Density

98. Three (3) gaming venues operate within Wodonga, with a total of 150 attached EGMs. Currently, all attached EGMs are operational within the LGA, yet it remains well below the municipal limit of 304 EGMs.

### 4.4 Venue Catchment

99. The accepted primary catchment for a regional venue in a service centre town is 5km, with a secondary catchment of 20km given the concentrated nature of regional towns and the accepted fact that people living in the regions are required to travel by car for goods, services and recreational pursuits. The Commission has accepted these catchment thresholds previously.
100. As such, this report and the Expenditure Analysis prepared by SW Accountants and Advisors has focused on a primary catchment of 5km and a secondary catchment of 20km to ensure consistency where relevant.
101. The Venue conducted a Patron Postcode Survey over a 34-day period, for guests to their bistro during the November-December of 2024. A full breakdown of this data has been provided at Appendix 6.
102. In summary, the bistro statistics show:
- 2121 people attended the bistro between 12 November and 15 December 2024, being the 34-day survey period;
  - 82% of those were from the main Wodonga and main Albury postcode and the immediate surrounding area postcode of each town – all within the 20km secondary catchment;
  - 51.7% of the total bistro guests were from ‘the Victorian side’ of the 20km catchment;
  - 30.3% of the total bistro guests were from ‘the NSW side’ of the 20km catchment;
  - 43.9% of all bistro guests were from the Wodonga (3690) postcode; 7.8% were from the ‘greater’ Wodonga outlying area postcode of 3691;
  - 22.5% of all bistro guests were from the Albury (2640) postcode; 7.8% were from the ‘greater’ Albury outlying area postcode of 2641; and
  - 18% of all visitors to the bistro were from outside of the accepted 20km secondary catchment of the venue.
103. It is therefore reasonable to draw the conclusion that:
- Almost half (48.3%) of the patrons surveyed over a 34-day sample period came from outside of Victoria and/or outside of the accepted 20km secondary patron catchment; and

- The majority (43.9%) of the patrons surveyed over a 34-day sample period came from within the Victorian component of the 5km primary patron catchment of the Venue.
104. The Venue has a collaborative working relation with the Quest Apartments next door. Given that they were constructed side by side on similar timeframes by the same builder (on separate titles and now under separate ownership) the practical relationship is that Quest is the convenient accommodation option for patrons attending functions at the Venue and the Venue provides for food and beverage services for guests staying at the Quest on short-stay business or leisure trips. The venues are even linked by an aero-bridge.
  105. To assist in establishing the patron profile of the Venue, at the request of the Feros family, the management of the Quest Apartments conducted a similar patron survey, summarised in Table 6 below. The results are accurate for the last 2,294 reservations over an approximate six-week period.
  106. The data identifies travellers from Australian states and territories, excluding overseas travellers. The report is derived from guest information provided, including postcodes where available.
  107. The spread of visitors has been summarised by state in the below Table 6.
  108. Of the 843 Victorian guests, 40 entries were residents from the Wodonga LGA.

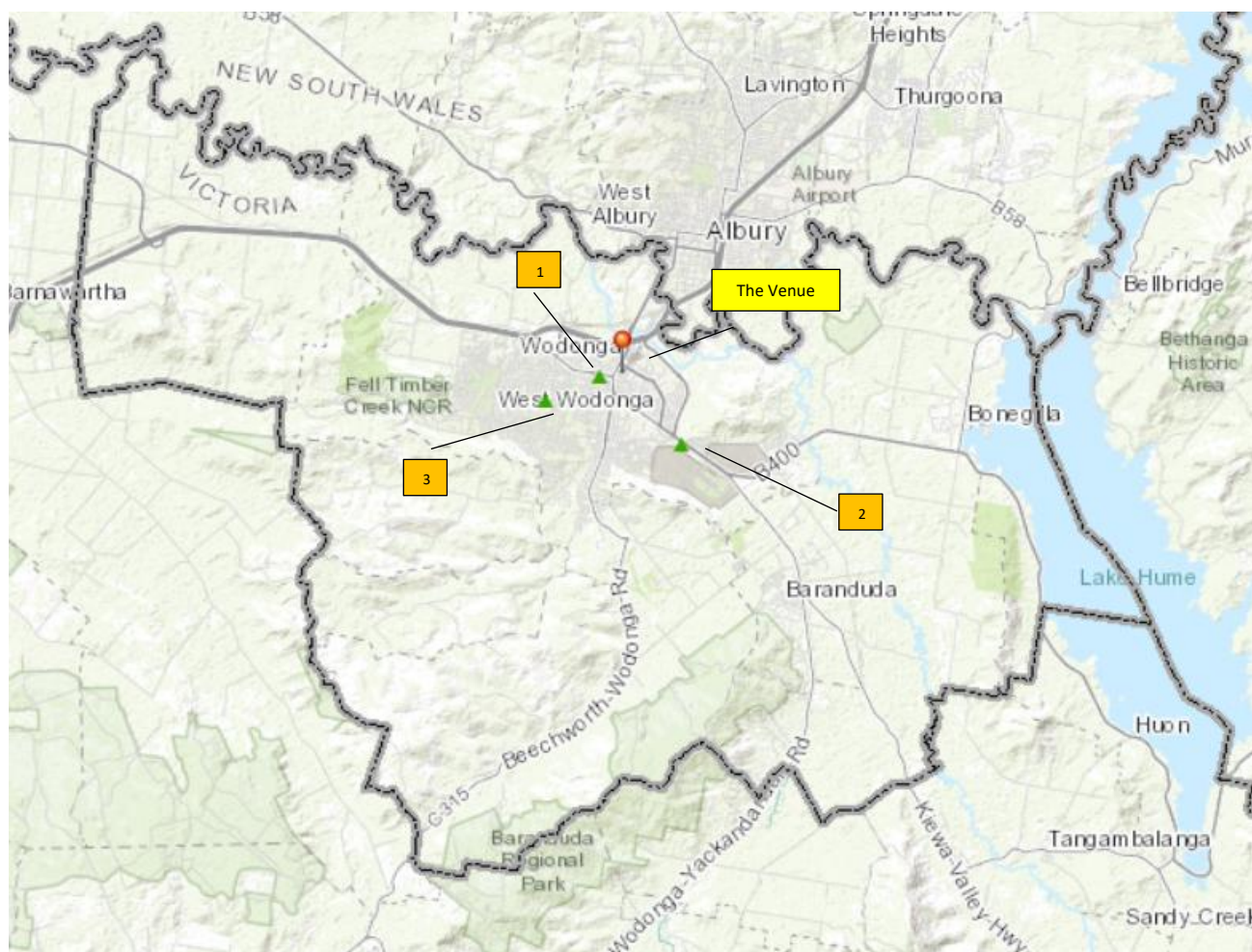
**Table 6 | Patron Survey Count Detailed Breakdown – Quest**

Patron Resides (State/Territory)	Number of Guests (Total)	Percentage %
New South Wales (NSW)	847	36.5%
Victoria (VIC)	843	36.2%
Queensland (QLD)	277	11.8%
South Australia (SA)	106	4.5%
Western Australia (WA)	158	6.7%
Northern Territory (NT)	18	0.8%
Tasmania (TAS)	25	1.1%
Australian Capital Territory (ACT)	45	1.9%

## 4.5 Other Licensed Venues

109. The following data in Figures 21 and 23, and Table 7 indicate the location of nearby Victorian venues with gaming facilities within the Wodonga LGA and a 60km radius of the Venue (on the Victorian side of the border).

**Figure 21 |** Map of venues within the City of Wodonga<sup>12</sup>



**Table 7 |** Legend for Gaming Venue Map in Figure 21 + 23 (VIC)

	City of Wodonga					Other LGA's			
#	Venue	Attached			#	Venue	LGA	Attached	
		Entitled	Operating					Entitled	Operating
1	Elgin's	80	80		4	Myrtleford Savoy Sporting Club	Alpine Shire	40	40
2	Blazing Stump Hotel	40	40		5	Pinsent Hotel	Rural City of Wangaratta	44	44
3	Birallee Tavern	30	30		6	The Old Town 'n' Country Tavern	Rural City of Wangaratta	35	35
					7	Wangaratta Club	Rural City of Wangaratta	25	25

<sup>12</sup> <https://geomaps.vgccc.vic.gov.au/Gaming/> data as of 16-Mar-25



Figure 22 | Monthly Net EGM Expenditure<sup>13</sup>

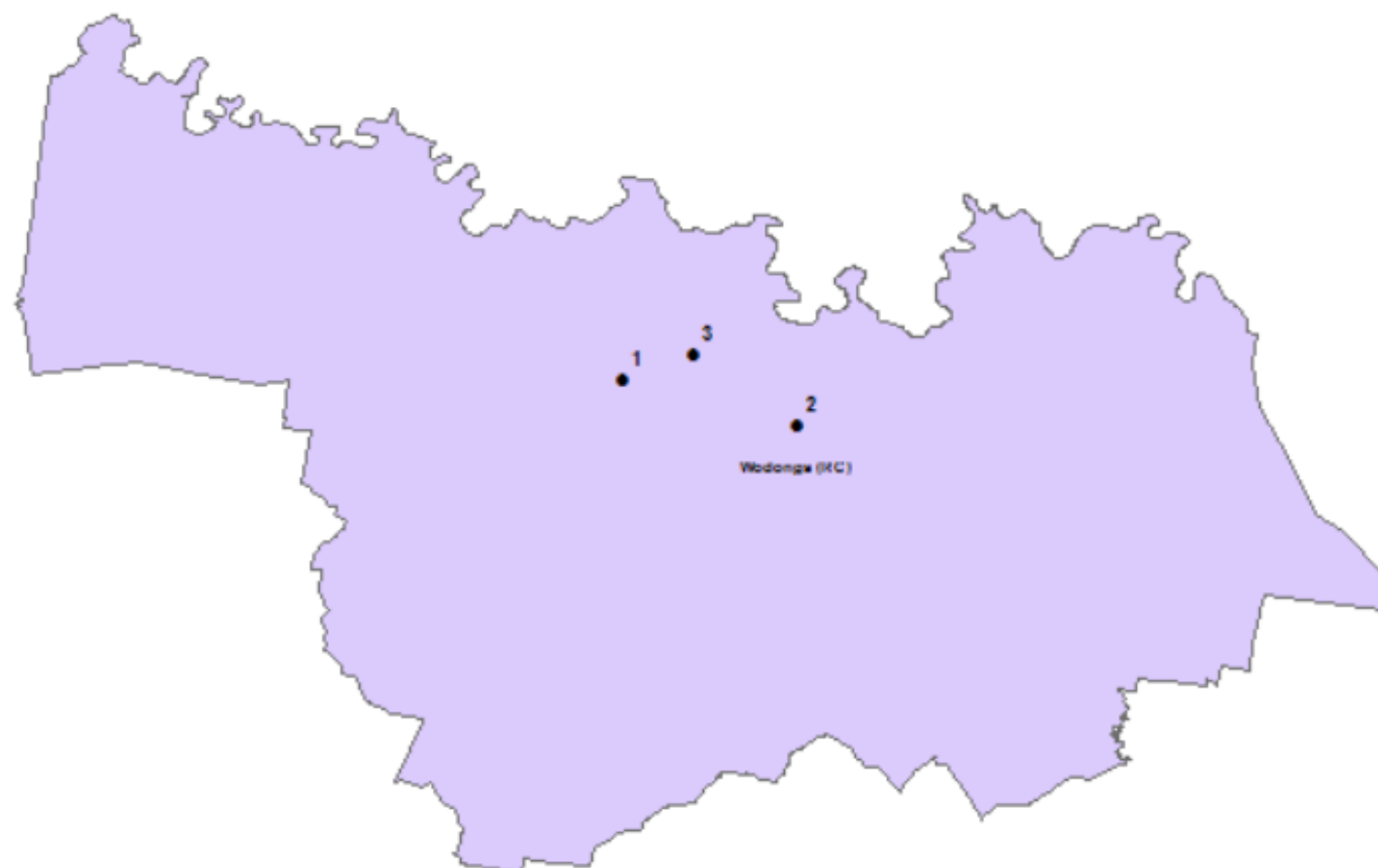
## Rural City of Wodonga - Current Venues Monthly Net EGM Expenditure

Net EGM expenditure is the total amount lost by players.

Financial Year	2024/25	2024/23
	\$	\$
July	1,046,450.73	953,026.38
August	1,134,944.23	957,420.11
September	919,247.37	867,117.45
October	922,459.25	797,532.90
November	981,341.01	973,067.15
December	0.00	883,968.74
January	0.00	825,393.88
February	0.00	800,878.47
March	0.00	907,866.31
April	0.00	938,832.31
May	0.00	943,054.47
June	0.00	934,608.64
<b>TOTAL</b>	<b>\$5,004,442.59</b>	<b>\$10,782,766.81</b>

**PLEASE NOTE** that the "Monthly Net Electronic Gaming Machine Expenditure" amount appearing above is based on data that may not have been fully audited to date. Any changes are unlikely to have a material effect on the figures provided.

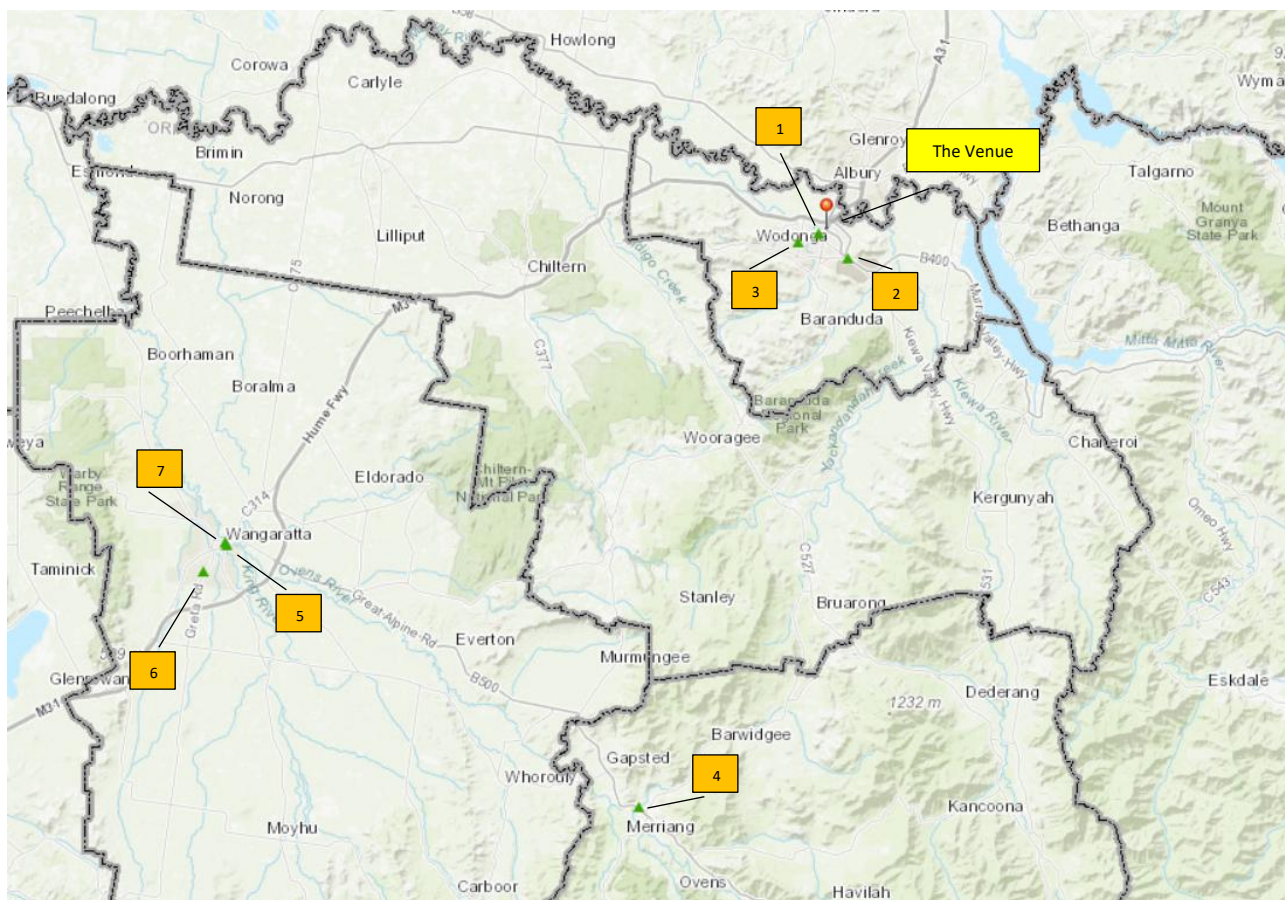
The data is audited on an ongoing basis during each financial year to produce the annual net expenditure amount appearing above.



	Venue	Address	Attached Entitlements	Licensed EGM's	Venue Type	Expenditure (July 23 - June 24)
1	<a href="#">BIRALLEE TAVERN</a>	97-99 MELROSE DRIVE WODONGA VIC	30	30	Hotel	\$ 2,148,381.17
2	<a href="#">BLAZING STUMP HOTEL</a>	4315 ANZAC PARADE WODONGA VIC	40	40	Hotel	\$ 2,266,817.86
3	<a href="#">ELGIN'S</a>	51-53 ELGIN BOULEVARD WODONGA VIC	80	80	Hotel	\$ 6,367,567.78
			150	150		\$ 10,782,766.81

<sup>13</sup> [https://apps.vgccc.vic.gov.au/CA2570C30016EEF3/pages/map\\_wodonga?Open](https://apps.vgccc.vic.gov.au/CA2570C30016EEF3/pages/map_wodonga?Open)

**Figure 23 |** Map of venues within a 50km radius of the Venue (VIC ONLY)



## 4.6 Increased Gaming Opportunities

114. Currently three (3) venues operate gaming machines within the City of Wodonga; with a collective total of 150 EGMs. The proposal for the Venue does not include a proposal to be the biggest gaming venue in the City of Wodonga with the largest venue operating 80 EGMs. The proposed Club Wodonga venue will be the only 'club' venue on the Victorian side of the patron catchment it shares with three (3) Wodonga Hotel venues and a multitude of club and hotel venues in Albury.
115. At the time of writing this report, Albury, NSW, hosts 1,125 EGMs across 15 various licensed venues, including clubs and hotels. This figure is based on data from the NSW Independent Liquor & Gaming Authority, as detailed in Table 8 below.
116. It shows 1,312 GMEs, of which 1,125 were attached and operational at the time of writing. It is noted that the NSW gaming environment is different to the Victorian system, so statistics are represented otherwise, but the fact remains that there are at least 1,125 EGMs operating in Albury NSW, within (or just outside) the 5km catchment shared by the Venue.

117. The distribution of EGMs in Albury (December 2024) is as follows:

Clubs: 910 EGMs are located in clubs, offering a range of gaming and entertainment options to members and guests.

Hotels: 215 EGMs are situated in licensed hotels, providing gaming facilities alongside accommodation and dining services.

**Table 8 | Gaming Venues in City of Albury** <sup>14</sup>

Licence Details as at 1 December 2024		Gaming									
			1,312	4	1,308	6	-	1,314	5	1,319	1,125
Licence name	SA2	Band	GMEs	GME Lease d Out	Net GMEs	GME Lease d In	PMPs	Auth Limit	Unfulfi lled Quota	GMT	EGMs
Albury Soldiers Sailors & Airmens Club Limited	Albury - South	2	375	0	375	0	0	375	0	375	322
Astor Hotel Motel Beer Deluxe (Albury)	Albury - South	2	29	0	29	0	0	29	0	29	29
Boomerang Hotel Commercial Club (Albury) Ltd	Lavington	3	21	0	21	0	0	21	0	21	21
Commercial Golf Resort	Albury - South	2	610	0	610	0	0	610	0	610	500
Kinross Woolshed Hotel	Albury - South	2	37	0	37	0	0	37	0	37	37
Newmarket Hotel	Albury - East	1	16	0	16	0	0	16	3	19	0
Northside Hotel	Albury - East	1	21	0	21	0	0	21	0	21	21
Railway Hotel	Lavington	3	24	0	24	0	0	24	0	24	24
Soden's Australia Hotel	Albury - South	2	30	0	30	0	0	30	0	30	30
Star Hotel	Albury - South	2	16	0	16	0	0	16	0	16	16
The Bended Elbow The Springdale Heights Tavern	Albury - South	2	17	0	17	6	0	23	2	25	23
Thurgoona Country Club Resort	Albury - South	2	10	4	6	0	0	6	0	6	6
	Lavington	3	30	0	30	0	0	30	0	30	30
	Albury - East	1	61	0	61	0	0	61	0	61	51

118. To aid understanding of the NSW reporting:

*The gaming machine threshold (GMT) is a number which limits how many gaming machine entitlements (GMEs) - and/or poker machine permits (PMPs) in the case of hotels - each club and hotel licence is approved to hold. GMT is a cap on transferable or leased GMEs held by each club and hotel - and, in the case of hotels, on transferable PMPs. A venue must have a GME or PMP for each gaming machine operated.*

<sup>14</sup> [Licensed premises data - Liquor & Gaming NSW](#)

119. The NSW Government Department of Creative Industries, Tourism, Hospitality and Sport provides quarterly and annual report data on gaming profit from LGAs. Data on gaming expenditure for LGA or specific venues is not publicly available.
120. The profit from EGMs in clubs and hotels is summarised in the below tables, noting a collective total of approximately \$93.6m net profit.

**Table 9 | Clubs: Gaming Machine Annual Report 01-Sep-2023 – 31-Aug-2024<sup>15</sup>**

Clubs: Gaming Machine Annual Report by Local Government Area (LGA) for the Period 1 September 2023 to 31 August 2024						
Local Government Area (LGA)	Net Profit	Tax	Electronic Gaming Machine numbers as at 31 Aug 2024	Premises Count	LGA Population	Electronic Gaming Machines per 100k population
Albury						
Greater Hume	72,089,707	16,434,373	949	8	67,250	1,411

**Table 10 | Hotels: Gaming Machine Annual Report by Local Government Area (LGA) for the Period 1 July 2023 to 30 June 2024<sup>16</sup>**

Hotels: Gaming Machine Annual Report by Local Government Area (LGA) for the Period 1 July 2023 to 30 June 2024						
Local Government Area (LGA)	Net Profit	Tax	Electronic Gaming Machine numbers as at 30 June 2024	Premises Count	LGA Population	Electronic Gaming Machines per 100k population
Albury	21,557,449	6,887,881	234	11	56,093	417

121. The introduction of EGMs at the Venue seeks to provide additional capacity for entertainment and enjoyment for patrons of the Venue and broader community, considering the Venue's limited competition within the catchment area.
122. It is considered that a significant portion of forecast EGM expenditure at the Venue will not be new spend, but the spend of Victorian residents currently travelling across the border to partake in EGM gambling in NSW club venues.

<sup>15</sup> [https://www.liquorandgaming.nsw.gov.au/\\_data/assets/excel\\_doc/0003/1339365/gaming-machine-annual-report-by-lga-clubs-fy2023-2024.xlsx](https://www.liquorandgaming.nsw.gov.au/_data/assets/excel_doc/0003/1339365/gaming-machine-annual-report-by-lga-clubs-fy2023-2024.xlsx)

<sup>16</sup> [https://www.liquorandgaming.nsw.gov.au/\\_data/assets/excel\\_doc/0006/1339359/gaming-machine-annual-report-by-lga-hotels-fy2023-2024.xlsx](https://www.liquorandgaming.nsw.gov.au/_data/assets/excel_doc/0006/1339359/gaming-machine-annual-report-by-lga-hotels-fy2023-2024.xlsx)



- 123. The proposal seeks to 'win back' this lost revenue back into Wodonga, as well as the 'leaked' retail spend that is currently occurring across the border (shopping, groceries, retail etc) whilst Wodonga locals are in Albury.
- 124. It is considered that creating a venue such as Club Wodonga also presents an opportunity to encourage Albury residents, as well as the broader southern NSW community, into Wodonga on the basis that they have created a family friendly multi-use club venue that does not currently exist in Wodonga.

#### 4.7 Proposed Hours of Operation

- 125. No variation to the current operating hours permitted on the current Liquor Licence of the Venue is intended. It is noted that under the management of the Feros family the current Hotel has elected to stay open longer than the previous management chose to operate, as patronage has increased and patron demand enables the Venue to trade longer hours, but the hours of operation are still within the licenced hours.

#### 4.8 Community Wellbeing

- 126. It is not anticipated that the wellbeing of the community will be detrimentally impacted by the addition of 70 EGMs at the Venue, given that existing gaming venues operate in the community and the additional machines will not result in any sizeable change to the EGM quantity across the overall catchment.
- 127. The proposed community contributions program aims to provide significant financial support to a wide range of community groups. A number of these groups are junior sporting organisations and youth welfare agencies where the beneficiaries will all be under the age of 18.

##### 4.8.1 Community Attitude

- 128. The concept of Club Wodonga was first raised with Council in 2016. Since that time the owners of the Venue have met with Council on a number of occasions to workshop the likely future structure of any such club venture. Meetings held in 2016, 2019, 2022, 2024 and as recently as February 2025 indicate that there has been a high level of transparency in terms of the Club Wodonga concept and feedback from Council has always been constructive, albeit with the caution of due process and the need to address and comply with Council policy (which has evolved over the process as it relates to this proposal).

129. Whilst there has not been a formal Community Attitude survey undertaken there has been considerable consultation with the local Council who have the representative role of their constituents, particularly in a regional centre such as Wodonga where the Council Officers and Councillors are generally more intimately engaged with their community than in a more highly populated metropolitan setting.

#### 4.8.2 Community Support

130. To date, the Feros family, and Mr Perry and his stakeholders have held constructive informal discussions with a range of community groups to ascertain interest in being supported by Club Wodonga should it be approved. These discussions cannot be formalised until such a time as the Venue is approved as any attempt to enter into agreement with community groups would be potentially misleading if the community contributions program as proposed does not materialise should the proposal fail to be supported by Council and the VGCCC.
131. The following community groups and individuals have been engaged thus far:
- Boys to the Bush (attended a meeting with Club Wodonga representatives and Council in support);
  - Wodonga Raiders Football Club;
  - Wodonga Warriors Softball/Baseball Club(s);
  - Quest franchisee;
  - Ploughman's;
  - High Voltage Games;
  - Australian Defense Force – Wodonga (ADF);
  - Veterans Hub Wodonga;
  - Alfonso Building Solutions;
  - Rod Wangman (former Mayor with a view to a position on inaugural Club Wodonga Committee);
  - John Perry (William Perry's brother and ex-publican, with a view to a position on inaugural Committee);
  - Michelle Brown (Local Building company with a view to a position on inaugural Committee);
  - Roger Arnold of Arnold's Fruit and Veggies (with a view to a position on inaugural Committee);
  - Wodonga Bulldogs Football Club;
  - Vietnam Veterans Wodonga; and
  - Wodonga RSL.

## 5 Gaming Approval and Council Policy

---

### 5.1 Council Policies

132. In 2023, Wodonga City Council, introduced the Gambling Harm Prevention Policy. The policy focuses on promoting responsible gaming practices and protecting community well-being. It defines the Council's legislative and strategic role in regulating EGMs and licensed venues to mitigate the negative impacts of gambling.
133. The policy articulates Council's public health approach to all decision-making regarding gambling, using the following principles:
- *Equity: Gambling-related harm should not be disproportionately experienced by vulnerable groups within the community. Efforts to address gambling related harms will prioritise reducing health inequities.*
  - *Prevention Oriented: Strategies will take a community-wide perspective on health, prioritising actions that aim to prevent harm from occurring in the first place, rather than solely addressing harm once it has already occurred.*
  - *Collaboration: While the Council can offer leadership, preventing and minimising gambling-related harm requires the involvement of various stakeholders and agencies, underscoring the need for a collaborative and intersectional approach.*
  - *Evidence based: Strategies and actions will be based on a robust and transparent evidence base.*
  - *Social Determinants of health: Gambling-related harm is influenced by a range of factors, including socio-cultural, political, economic, environmental, and health-related determinants. Efforts to address gambling-related harm will consider the broader determinants of health.*

#### 5.1.1 Local Council Planning Policy

134. The Wodonga Planning Scheme includes a Gaming Policy, Liquor Policy, and 2050 Community Vision Plan as part of the Local Planning Policy Framework.

#### **City of Wodonga Alcohol Harm Preventative Policy**

---

The policy aims to achieve the following objectives:

- Articulate Council's public health approach to prevent alcohol-related harm.
- Establish a robust, evidence-based, and consistent approach to planning and regulatory decisions related to the sale and consumption of alcohol in Wodonga.
- Secure the real and perceived safety and amenity of places and spaces within the municipality where alcohol is purchased and consumed.

- Promote a vibrant and secure night-time economy, cultivating a community environment that prioritises safety and well-being.

**Response:**

The Venue has been operating as a licenced premises since 2013 and is a family friendly venue which follows stringent Liquor Licencing and Responsible of Service of Alcohol protocols and provides a variety of spaces for the community to come together in a safe and welcoming environment. The Venue is located within the heart of the entertainment hub of Wodonga and already operates under an approved Red Line Plan. The licence type (currently 'general') and Red Line Plan are proposed to be updated to accord for the new club management and align with the refurbishments and improvements to the site. The proposal is architecturally designed in order to create safe and welcoming spaces for its patrons and avoids creating any spaces where anti-social behaviour is likely to occur through appropriate design choices. The licenced hours are not proposed to be changed and proposed extended hours of operation are reasonable for the previously approved use and within licenced hours. It is submitted that the amendment to the Red Line Plan and licence type with continuation of the Venue's well-run operations are unlikely to produce an increase in alcohol-related harm.

**City of Wodonga Gaming Harm Preventative Policy**

---

The policy aims to achieve the following objectives:

- Articulate Council's public health approach to gambling.
- Establish a robust, evidence-based, and consistent approach to planning and regulatory processes that effectively manage the location and operation of new and additional Electronic Gaming Machines (EGMs).
- Build the community's capacity to engage in healthy lifestyles by facilitating a diverse range of non-gambling activities that cater to the interests and preferences of community members.
- Ensure the social and economic impacts associated with EGMs are considered with the goal of achieving net community benefit

**Response:**

As per this report a range of benefits and disbenefits have been considered in connection with the application for approval of premises and inclusion of EGMs. Overall, the assessment found that the potential social and economic benefits outweigh the potential disbenefits with an overall net benefit to the Wodonga City Community. Given the location of the Venue, being on the border of Victoria and NSW, the community has already seen long-term exposure to EGMs based in Albury. The proposal for the addition of 70 EGMs on site will have less negative impact on its catchment than a new club venue in any regional service centre town elsewhere in Victoria. The Venue is to maintain a strong focus on community support, collaboration with Council and operate via the stringent RSG protocol.



The Venue already provides and will have further scope to increase their range of non-gambling community and family friendly spaces and activities post refurbishment which include but are not limited to; function spaces, bistro, café, outdoor areas, kids play area, sports bar and the offerings of various community activities at different times throughout the year. The location is within the Activity Centre Zone to promote protection of residential amenity, harm minimisation and provide community benefit. There are no nearby educational facilities which focus on people under the age of 18. The Rate of EGM per 1000 adults in the region does not exceed the Victorian rate. Overall, the proposal seeks ultimately to provide benefit to the community through a set of charitable objects outlining the intentions of the Club to funnel funds back into various community contributions.

#### **Wodonga 2050 Draft Community Vision Plan**

---

The Wodonga 2050 Community Vision is a community-led and informed document that outlines the aspirations for the future of the City.

#### **Response:**

Not all areas covered by the Council vision document are relevant to this proposal, however, the proposal considers a variety of areas within the draft Community Vision as follows:

#### **2. Wellbeing for All**

The Venue provides a safe community and family friendly environment with a range of spaces and offerings including but not limited to: function spaces, bistro, café, outdoor areas, kids play area, sports bar and the offerings of various community activities throughout the year.

With the refurbishment of the Venue, the Club has considered a range of charitable objectives and proposes a fund which provides for various community contributions totalling at least \$150,000 (with projections as high as \$250,000 subject to venue performance) within the first year of expanded operations. The Venue is accessible to all residents within the community.

#### **4. Places and Spaces for All**

The Venue provides an increased sense of safety within the community by providing a wide range of architecturally designed safe spaces which deter anti-social behaviour. The Club will continue to adhere to strict RSA protocols and implement the appropriate RSG protocols to ensure the mental and physical health of the community is upheld. Functional spaces are provided within the Venue to promote connection, and the updated Venue looks to bring additional economic benefits back to the Victorian side of the border not only through additional employment opportunities but through a wider range of offerings to residents and visitors from outside the area alike, providing

additional economic benefits to the area. The Venue provides a welcoming and accessible space for all.

## 5. Connected Communities

The Venue provides several spaces suited to the community alongside the community contributions as mentioned previously. There has been a shift within the operations of the Venue to make it more family friendly and inclusive to all. Some of the ways this has been implemented since the Feros family have taken over operations are listed elsewhere in this report.

## 5.2 State Planning Policy – Clause 52.28 Gaming

### 135. Purpose

- *To ensure that gaming machines are situated in appropriate locations and premises.*
- *To ensure the social and economic impacts of the location of gaming machines are considered.*
- *To prohibit gaming machines in specified shopping complexes and strip shopping centres*

### Response:

A permit is required under the Clause to install or use a gaming machine. This report has considered the proposal to provide 70 EGMs within a new designated gaming area within the proposed Club Wodonga venue. It is submitted that the provision of these machines will result in a net benefit to the Wodonga City Community and are appropriate with the following considerations noted:

The Venue is in relative proximity to other key local business hubs in the town including the RSL, Quest Apartments, the Police Station and legal precinct and the municipal offices including Council and the Library. It is noted, however, that the subject site is separated from the CBD and not on what could reasonably be considered an 'ant-trail' to convenience uses within the CBD area. The immediate area is considered to be the entertainment precinct or hub in Wodonga.

The Venue is not located within shopping complexes or strip shopping centres nor is it located within Wodonga Plaza or Birallee Shopping Centre

The Venue provides and proposes to expand on their full range of club facilities to members and patrons that service a broad range of community members and encourages tourism from outside of the area.

**The Venue as proposed will become a genuine multi-use hospitality venue, offering:**

- **Bistro;**
- **Sports Bar and TAB with free Foxtel sporting events for guests;**
- **Kids Area including arcade;**
- **Function Rooms;**
- **Café which will also look to service the nearby Quest apartments;**
- **Indoor and Outdoor Terraced Areas/Dog friendly spaces; and**
- **Purpose designed Gaming Lounge with bar, lounge and DOSA areas.**

**The proposal is not incompatible with adjoining and nearby land uses.**

**The proposal is for not-for-profit club venue and as such also considers Community Contributions that will be available through the expansion of offerings.**

136. A Green Line Plan is submitted with this application and encompasses the gaming area of the Venue. Please refer to Figure 19 and Appendix 5.

### 5.3 Gaming Approvals and Precedents

#### 5.3.1 Former VGCCC Decisions

137. The following points made in previous decisions by the VGCCC are considered relevant to this proposal.
138. In July 2024, the VGCCC granted an application for a Cook Country Hotels Pty Ltd as a new venue for 40 EGMs at the Huntly Hotel in Huntly. The relevance of the recent VGCCC decision lies in its approval of a new gaming venue—one of the few genuinely new venue proposals in recent years, with the majority of applications being for EGM top-ups at existing sites.
139. While this particular application related to a hotel in Bendigo and involved 40 EGMs (which differs from our own application), the points raised, and reasoning adopted by the VGCCC provide several valuable considerations that are relevant.
140. A key consideration in the decision relates to employment-related benefits, as discussed in paragraphs 106–108. The VGCCC acknowledged that new employment opportunities would result in some economic and social benefits for the local community; however, it concluded that these benefits were not significant in the broader context of the local economy. Importantly, the VGCCC emphasised the need to assess each employment-related benefit separately—including direct employment, labour value-add associated with capital works, and net employment impact—before forming an overall view. This SEIA aims to provide that analysis for the benefit of the VGCCC as it relates to Club Wodonga.

141. Another relevant finding in the decision relates to competition among gaming venues. In the Bendigo context, the VGCCC acknowledged the presence of increased competition but ultimately found it provided no net benefit due to the existing diversity and saturation of gaming venues in that area. This contrasts with the Club Wodonga application, as the Wodonga LGA has a limited number of venues and a much narrower offering, especially compared to neighbouring municipalities in NSW where large clubs have a long-establishment foothold. As such, the introduction of a new club venue in Wodonga may fill a clear market gap on the Victorian side of the border and offer additional choice for consumers.
142. Venue-specific and catchment-related factors were also discussed by the VGCCC, particularly in terms of their potential to either mitigate or exacerbate gambling-related harm. Paragraph 123 of the decision outlines that harm minimisation measures were considered effective in reducing risk to as low as reasonably practicable. This finding is acknowledged and supported by the proponent in this instance and reinforces the importance of the Feros family approach to harm minimisation and RSG at Club Wodonga. The investment in comprehensive risk assessments and the engagement of DNS as specialist consultants underscores their commitment to best-practice safeguards and demonstrates the proactive nature of the proposal.
143. Finally, the VGCCC placed significant emphasis on community attitude, particularly the importance of an agreed position between the applicant and the local Council. Whilst the formal position of the City of Wodonga is yet to be determined, subject to a formal application with all relevant supporting plans and reports, the ongoing proactive liaison with Council and local community groups regarding the Club Wodonga concept since 2016 would indicate a general level of support to this point.
144. McKinnon Hotel's 2022 application to increase EGMs from 45-60 at the McKinnon Hotel, demonstrates consideration to supply contracts and complimentary expenditure, as well as RSG and competition, whereby the VGCCC was clear in its view that such acts as compliance to audit checklists, is considered a "high rate" of RSG compliance. It is with this view in mind that the proponent has gone to significant lengths on harm minimisation activities as they seek to establish their first club gaming venue and their first Victorian gaming venue in Wodonga. The Club RSG requirements combined with the Venue's own Gambling Policy and Procedures Manual is a conscious effort to ensure previous VGCCC findings are adopted where possible.
145. Regarding competition, the VGCCC acknowledged that approving the application would contribute to increased gaming competition in the City of Glen Eira, particularly in light of recent venue closures. However, it found that the likely rate of patron transfer would be minimal, and as such, the economic benefit of increased competition was given little to no weight. This position stands in contrast to the Club Wodonga application, where the competitive landscape sharing a patron catchment with Albury (NSW), the anticipated transfer of patrons and expenditure, and potential community benefits to Wodonga community groups differ significantly.



146. It is worth noting the 6 principles of policy highlighted by the VGCCC:
- *developing and reinforcing the government's commitment to responsible gambling through measures that assist and protect problem gamblers and those at risk of becoming problem gamblers, their families and the wider community;*
  - *developing and maintaining the state's commitment to the highest standards of probity for gambling service providers;*
  - *accepting gambling is a valid activity for many Victorians who are entitled to expect ongoing high standards of service, transparency and accountability from the gambling sector;*
  - *ensuring that the legitimate financial benefits of gambling (both private and public) are transparent, appropriately recognisable and fairly distributed to the Victorian community;*
  - *that to the extent possible and consistent with the other principles, gaming service providers operate in a competitive environment; and*
  - *establishing proper consultative processes to ensure that appropriate information is given to, and input is received from, the wide variety of persons interested in gambling including stakeholders, affected parties and, to the widest extent possible, the broader Victorian community.*
147. Consideration to these is evident not only in the weighting given to the impacts on the McKinnon application, but also the DOXA Community Club, whereby the application for Clocks at Flinders Street Station to increase from 100-105 EGMs was granted in 2024.
148. The VGCCC once again emphasised the importance of the policy framework and the six guiding principles, highlighting their relevance in assessing applications of this nature. This report also aims to address those principles in the weighting tables where relevant in the Club Wodonga proposal.
149. It is worth making note to the refusal of the Romsey Football Netball Club Inc application. The 2024 decision raises several points highly relevant to the Club Wodonga application in my view. It highlights key considerations such as the club versus hotel structure, the reliability of financial projections and profit forecasts, and the implications of Management Agreements. The VGCCC questioned the clarity and credibility of the financial information, including unexplained net profit figures and applicant loans, and scrutinised the scale of the redevelopment cost—much of which related to non-construction expenses. The lack of a clear commitment to using local contractors was seen as a shortcoming, and the limited long-term community benefit from one-off capital works was also noted. Additionally, the presence—or absence—of robust harm minimisation commitments was considered critical to the application outcome. It is considered that all those economic and social disadvantages have been addressed by the Club Wodonga proposal and been explored and analysed in this report. Where possible and practical the Feros family and the Club Wodonga stakeholders have aimed to be as transparent and prescriptive as possible with Council and the community to this point, whilst not able to be absolutely prescriptive and committal until the proposal is approved and they know precisely what they can and cannot commit to.

150. Despite being an older decision, the 2017 application for a new gaming venue with 50 EGMs at Wangaratta RSL is considered relevant to this application. In relation to redevelopment of the premises the VGCCC found that it was appropriate to consider the social benefits arising from the communities access to and use of the improved facilities as a benefit of the Application... the Commission regards access to such improved facilities and enhanced range of services as a positive social impact, upon which is places moderate weight. The weighting table in that decision noted a moderate weight for the social benefit of such improved facilities. In this instance I have attributed a low weighting for the venue improvements, but this is on the basis that the venue is already a high-quality venue and whilst it will be improved significantly as the result of the Club Wodonga proposal it won't be a dramatic as the improvement at the Wangaratta RSL venue in question. That said, the proposed improvements to the venue still result in a net community benefit in my opinion.
151. The expenditure on capital works and employment creation were considered to have a low to marginal weight, as did the increased gaming competition and diversion of trade. The decision notes that the providing EGMs at a more attractive venue may see patrons choose to play EGMs at the venue as opposed to that of competitors. This is one of the main drivers behind the gaming component of Club Wodonga as there are no club gaming venues in Wodonga (only 3 pub venues) and a host of large club venues immediately across the border in Albury that share the same gaming patron catchment so it is anticipated that creating an attractive, modern, club gaming environment will help draw patrons from other venues more so than attract new gamblers.
152. In that decision for Wangaratta RSL, it was determined that *there is likely to be a small net positive social and economic impact to the well-being of the community...* with the VGCCC finding in favour of the application.
153. The submission is not dissimilar to the Feros Family's application for Club Wodonga, in that the setting, circumstances, and foundations for the application are aligned. The decision for Wangaratta RSL noted that:
- Factors such as increased employment, venue improvements, and support for local groups were weighed against risks like problem gambling and social harm.
  - The club showed financial standing, long-term viability, and ability to sustain operations, including how gaming revenue would be managed, were key considerations, as well as their ability to demonstrate a responsible financial model that ensures community benefits.
  - Policies such as self-exclusion programs, staff training, and support services were required to mitigate negative impacts.
  - The level of support or opposition from the local community and government authorities influenced the decision, with submissions from residents, Council, and welfare organisations taken into account.
  - Consideration was given to whether the location was appropriate, including its proximity to vulnerable populations, and the impact of the Club's presence on the surrounding area was assessed.

154. In 2021, the VGCCC approved an application by the Werribee Football Club Ltd to designate Club Tarneit, located at 115 Woods Road, Truganina, as a suitable venue for gaming operations. This approval permitted the installation and operation of 70 EGMs at the venue.
155. The approval allowed Werribee Football Club to proceed with the proposed development of Club Tarneit, which sought to provide a new community facility that includes gaming facilities, dining options, and a destination for social and sporting events.
156. The key findings and conditions of the decision are summarised in Figure 24 below:
  - The VGCCC assessed that the proposed venue would offer economic advantages, such as job creation and increased local spending, without causing significant social harm
  - The Applicant committed to establishing a foundation to provide annual contributions totalling \$75,000 to local not-for-profit groups and sporting organisations, enhancing community support
  - The approval was contingent upon Werribee Football Club obtaining the relevant planning permissions, specifically for the use of EGMs. The VGCCC imposed conditions to reduce potential negative impacts of the venue including design modifications and conditions on the Council planning approval.

**Figure 24** | Extract from the VGCCC decision

---

211. After consideration of the material before it, including the evidence provided at the Hearing, and weighted as outlined above and summarised in tabular form at Appendix B of these Reasons for Decision, the Commission has concluded that there is likely to be a net combined positive social and economic impact to the well-being of the community in the municipal district in which the Premises are located if the Application is approved.

157. The VGCCC decision was based on the assessment that the social and economic impact of the new gaming venue would not be detrimental to the well-being of the City of Wyndham community, thereby meeting the 'no net detriment' test.
158. The VGCCC concluded that the potential economic and social benefits outweighed any potential harm.
159. It is considered that the Club Tarneit proposal is closest to the Club Wodonga proposal in terms of recent VGCCC hearings. Whilst recognising that no two proposals are the same, there are definitely parallels between the Tarneit and Wodonga proposal, with the Wodonga proposal seeking to extend well beyond the community contributions accepted in that matter.



### 5.3.2 Problem Gambling and Gambling Related Harm

160. The Problem Gambling Severity Index (PGSI) establishes risk categories, and these are analysed in this SEIA. The VGCCC recognises that harms associated with problem gambling may be experienced directly by individuals and those associated to them, particularly those defined as 'addicted gamblers', 'problem gamblers' or 'moderate risk' gamblers.
161. Risks for problem gambling take numerous factors into account. These are further expanded in the following paragraphs.
162. A report by Roy Morgan in April 2019<sup>17</sup> specified that recent studies have indicated that there has been a fall in the number of people gambling in Australia, particularly on EGMs. The report was the result of some of the latest findings from Roy Morgan's 'Single Source' survey, which is based on in-depth interviews conducted face-to-face with over 50,000 consumers per annum in their homes. The report summarises the findings with:
- *The overall proportion of Australians (18+) who have gambled declined over the last decade, from 64.7% down to 47.9%.*
  - *The biggest drop in participation over the decade was for lottery/scratch tickets which were down 16.3% points to 40.1% but remain clearly the most popular gambling category. Poker machines showed the next biggest loss, **declining by 11.9% points to 13.7%***
163. Despite this downward trend in participation, it is still considered crucial that due consideration is given to identifying the risks presented to a problem gambler when considering an increase in gaming machines in an existing venue.
164. It is noted that this study was written before the impacts of COVID19, which is recorded to have had a drastic impact on the prevalence of gambling activities.
165. In his literature review for the Office of the Dean and Gambling Research Centre at the Auckland University of Technology, author Max Abbott surmised similar trends, noting that despite increased in EGM availability, prevalence estimates were continuing to decline. "While regular EGM participation is strongly linked to problem gambling, problems associated with this gambling form appear to be typically of short duration<sup>18</sup>".
166. The impacts of COVID-19 on gambling behaviour and the gaming industry are detailed in section 8 of this report, but of particular significance are the findings of a Research Study for the Australian Gambling Research Centre<sup>19</sup> noting:
- *...the temporary closure of pokies venues had had immediate benefits for some people who gamble, including more money for essential items and increased savings*

<sup>17</sup> Fewer Australians gambling – Roy Morgan, April 2019.

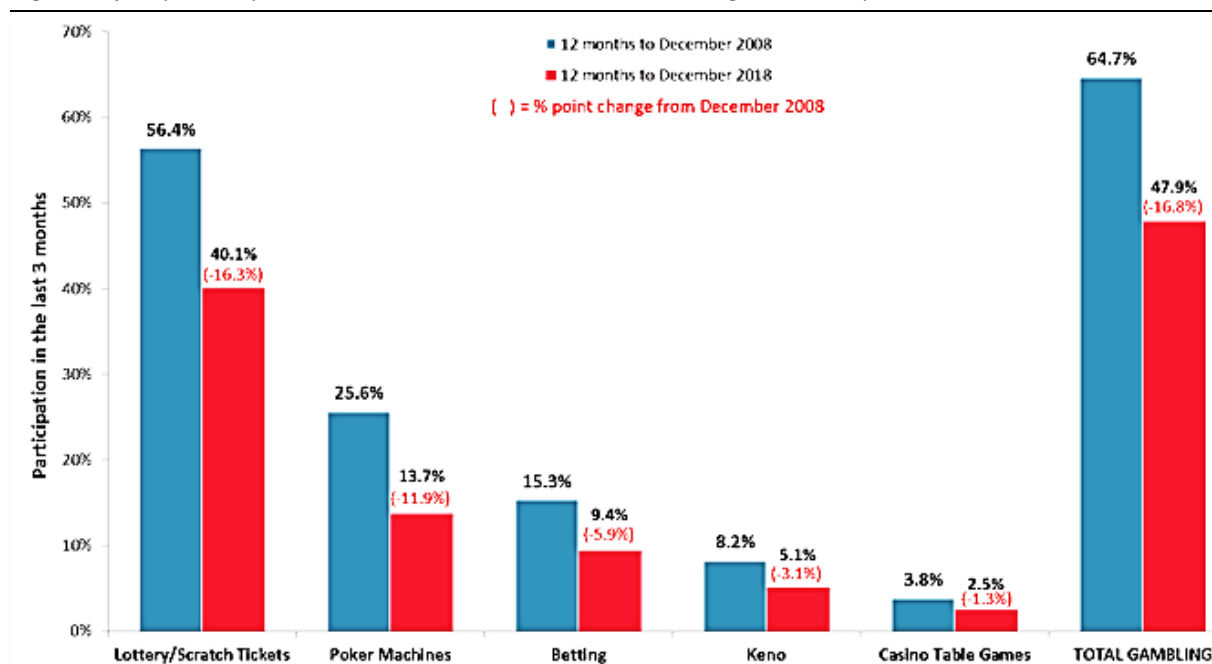
<sup>18</sup> Do EGMs and Problem Gambling Go Together Like a Horse and Carriage?', Max Abbott, January 2006, page 1

<sup>19</sup> 'Gambling in Australia during COVID-19 – Research Summary', Australian Gambling Research Centre, October 2020

- Even with limited access to venues, overall, participants gambled more often during COVID-19. The proportion who gambled 4 or more times a week increased from 23% to 32%.
- In general, while participation in racing, sports and other wagering activities remained relatively stable, there were statistically significant decreases in gambling on most land-based products during the restrictions, including:
  - poker/electronic gambling machines or 'pokies' (before 35%, during 14%)

167. The increased prevalence of online gaming has been previously recorded by the Victorian Responsible Gambling Foundation as part of the *Victorian population gambling and health study 2018-2019*<sup>20</sup>, in which the study found that 69% of adults in Victoria participated in some form of gambling in the past 12 months with online gambling, particularly online racing and sports betting, continuing to grow in popularity.

**Figure 25 | Graphical Representation of the Downward Trend of Gambling in Australia | 2008 to 2018**



168. Specific to EGM player behaviour, the study found that:

- Gamblers who spoke English at home (21.2%) were more likely to play EGMs than those who spoke another language (16.5%).
- Gambling was more common among regional Victorians compared with those living in Melbourne (74.3% compared with 67.4%), with more people playing EGMs in regional Victoria (25.4%) compared with Metro based gamblers (18.8%).
- Almost three quarters (73.3%) of people playing gaming machines played one to six times a year with 2.9% playing more than weekly.

<sup>20</sup> 'Victorian population gambling and health study 2018-2019 – Research Report', Victorian Responsible Gambling Foundation, March 2020

- *Problem gamblers (69.3%), moderate-risk gamblers (52.3%) and low risk gamblers (40.0%) were more likely to have played the pokies compared with non-problem gamblers (16.3%).*
- *Lower income gamblers were more likely to have played pokies than high income gamblers*
- *Pokies players from the oldest age group gambled on the pokies more frequently than those from the youngest age group. Around seventeen percent (17.4%) of those aged 75 years or over played the pokies 25 to 52 times per year compared with 5.8% overall, and the difference was statistically significant*
- *Victorian pubs, clubs or hotels continue to be the most common EGM venues visited, with 77.5% of EGM activity taking place in these venues in the 2018-2019 study (noting 2008 results recoded 77%).*
- *Participation in playing EGMs decreased from 21.5% in 2008 to 14.1% in 2018-19.*

169. The study also found that the prevalence of harm from gambling was not evenly distributed throughout Victoria with each of the eight regions the state having variances. It is acknowledged that the Northern Victoria region, which includes Club Wodonga, ranks at the moderately higher comparatively to other regions, however consideration is given to the breadth to which this region extends, which includes some more disadvantaged regions, particularly in more remote areas. It makes for 2.3% of extra severe harms compared to the overall Victorian average of 1.8%. These weightings are detailed further in Table 11.

170. The City of Wodonga lies within the Northern Victoria electoral region.

**Table 11 | Gambling Harms (SGHS) by Region, 2018-19<sup>21</sup>**

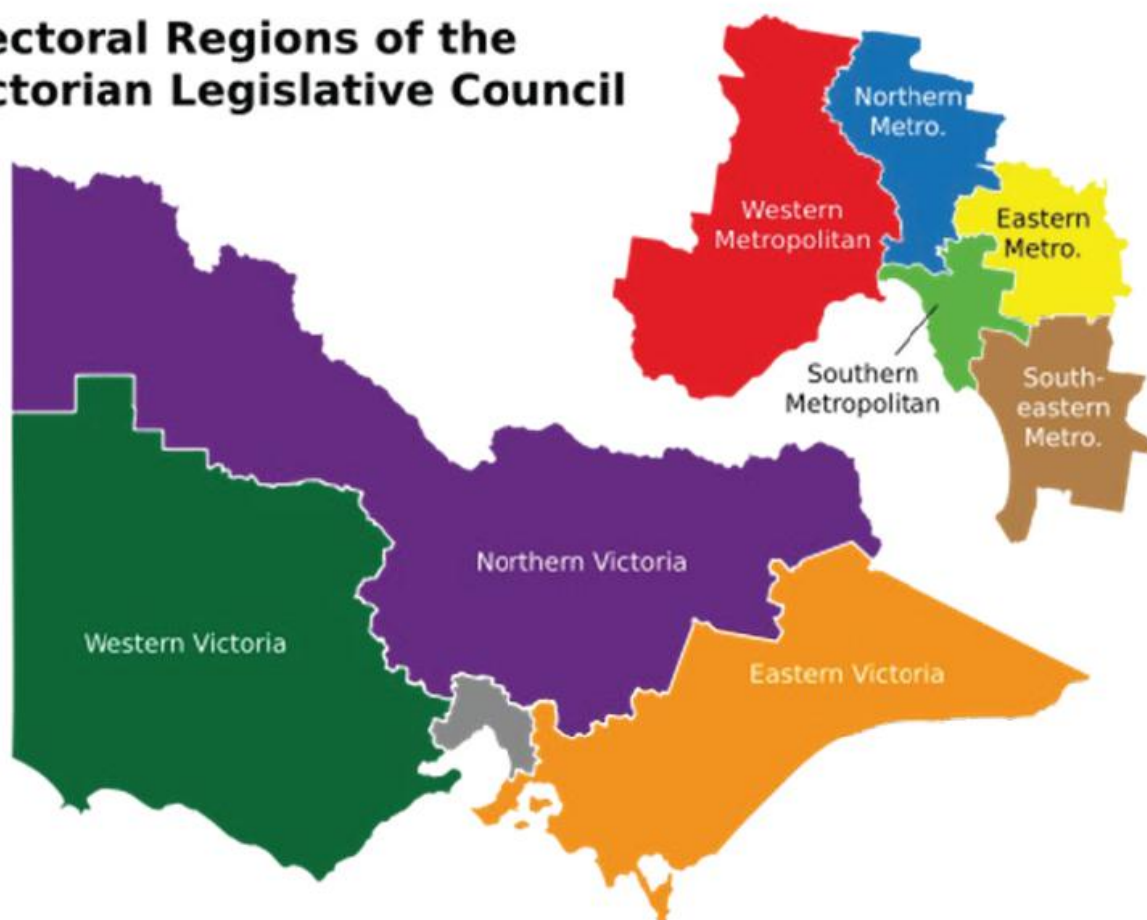
	Harms (SGHS)		Extra Severe Harms	
	Harms 0	Harms 1+	Harms 0	Harms 1+
Northern Metro	88.8% *	11.2% *	97.7%	2.3%
Southern Metro	92.0%	8.0%	98.6%	1.4%
South-eastern Metro	87.6% *	12.4% *	97.7%	2.3%
Eastern Metro	90.5%	9.5%	98.4%	1.6%
Western Metro	89.4%	10.6%	97.9%	2.1%
Northern Victoria	90.9%	9.1%	98.4%	1.6%
Eastern Victoria	91.3%	8.7%	98.2%	1.8%
Western Victoria	92.6% *	7.4% *	98.3%	1.7%
<b>All Victorian Gamblers</b>	<b>90.4%</b>	<b>9.6%</b>	<b>98.2%</b>	<b>1.8%</b>

Base: 7631 persons who had gambled in the last 12 months. \* significant differences from the proportions for all Victorian gamblers.

<sup>21</sup> **Source:** Victorian population gambling and health study 2018-2019

Figure 26 | Map of the 8 Electoral Regions of Victoria<sup>22</sup>

## Electoral Regions of the Victorian Legislative Council



### 5.3.3 Purported Links to Domestic Violence

171. The purported ties between problem gambling behaviour and domestic/intimate partner violence continues to be raised with little concrete evidence to support.
172. Literature review works for the Office of the Dean and Gambling Research Centre at the Auckland University of Technology concluded that *“Understanding of the circumstances under which EGM exposure, participation and problems are strongly linked, as opposed to weakly linked or disconnected, is rudimentary. It is apparent that future research... will need to pay greater attention to the roles that other environmental and individual factors play in problem development and cessation. At present too little is known, in any particular context, to be able to predict with certainty the consequences of increased or decreased EGM availability”*<sup>23</sup>.

<sup>22</sup> Source: Victorian population gambling and health study 2018-2019

<sup>23</sup> Do EGMs and Problem Gambling Go Together Like a Horse and Carriage?, Max Abbott, January 2006, page 30.



173. More recent exploration of such links seeks to consider beyond the external physical effects, with Australia's National Research Organisation for Women's Safety recently noted "*Previous research into problem gambling has examined its connection with intimate partner violence, however, this research generally defined violence in terms of physical assault. There has been little examination of gambling and its connection with coercive control or economic abuse*".<sup>24</sup>
174. In their complete 2020 Research Report<sup>25</sup>, it was found 'that gambling by both men and women intensified IPV against women', with such gambling-related determinants of IPV against women reported to include the financial and emotional stressors that gambling imposes on relationships.
175. The research group explores the above point in detail and ultimately returns following key findings:
- *Gambling does not directly cause intimate partner violence but can intersect with it in a range of different ways.*
  - *Economic abuse is highly prevalent among women experiencing gambling-related intimate partner violence.*
  - *The community lacks awareness about the impact of problem gambling and its link to intimate partner violence.*
  - *Gambling venues serve as safe spaces for women, and in many areas there are few alternatives.*

#### 5.3.4 Risks to Problem Gamblers at the Venue

176. The problem gambling studies prove that availability of physical venues in which people who wish to gamble responsibly will not prevent problem gamblers from doing so in an online environment. However, the VGCCC finds that through the implementation of good RSG protocols at a venue in line with the *Venue Operational Requirements*<sup>26</sup> by the VGCCC and having proactive staff that interact with the patrons on a regular basis, the risks to problem gamblers is lessened.
177. The Club Wodonga Gaming Policies and Procedures document (Manual) aims to ensure best practice and harm minimisation in connection with the use of EGMs at the Venue. The Manual sets out the RSG and gambling harm minimisation strategies, policies and procedures for Club Wodonga, including controls in place to address risks of gambling harm and operational practices implemented by the Club to manage the likelihood of events of gambling harm occurring and consequences of the same.

<sup>24</sup> 'Problem gambling and intimate partner violence: Key findings and future directions – Research to Policy & Practice', Australia's National Research Organisation for Women's Safety, September 2020

<sup>25</sup> 'The relationship between gambling and intimate partner violence against women – Research Report', Hing, N et al. for Australia's National Research Organisation for Women's Safety, September 2020, page 7.

<sup>26</sup> <https://apps.vcglr.vic.gov.au/CA25783200814C9F/towards2012/675FCA6400C0F667CA2586A100048BE5?OpenDocument>

178. Although operating gaming venues in NSW and Queensland only currently, the Feros family have recognised the requirements in Victoria as more stringent and prescribed. Advice has been taken from industry experts in what mandated obligations should be included in the Manual. The Manual is therefore far more comprehensive, broad and specific than the manuals used in NSW and Queensland.
179. The *Harm Minimisation Report* prepared by DNS Specialist Services has been specifically commissioned by the Feros family in anticipation of Club Wodonga and can be found at Appendix 3.

## 6 Supporting Documentation

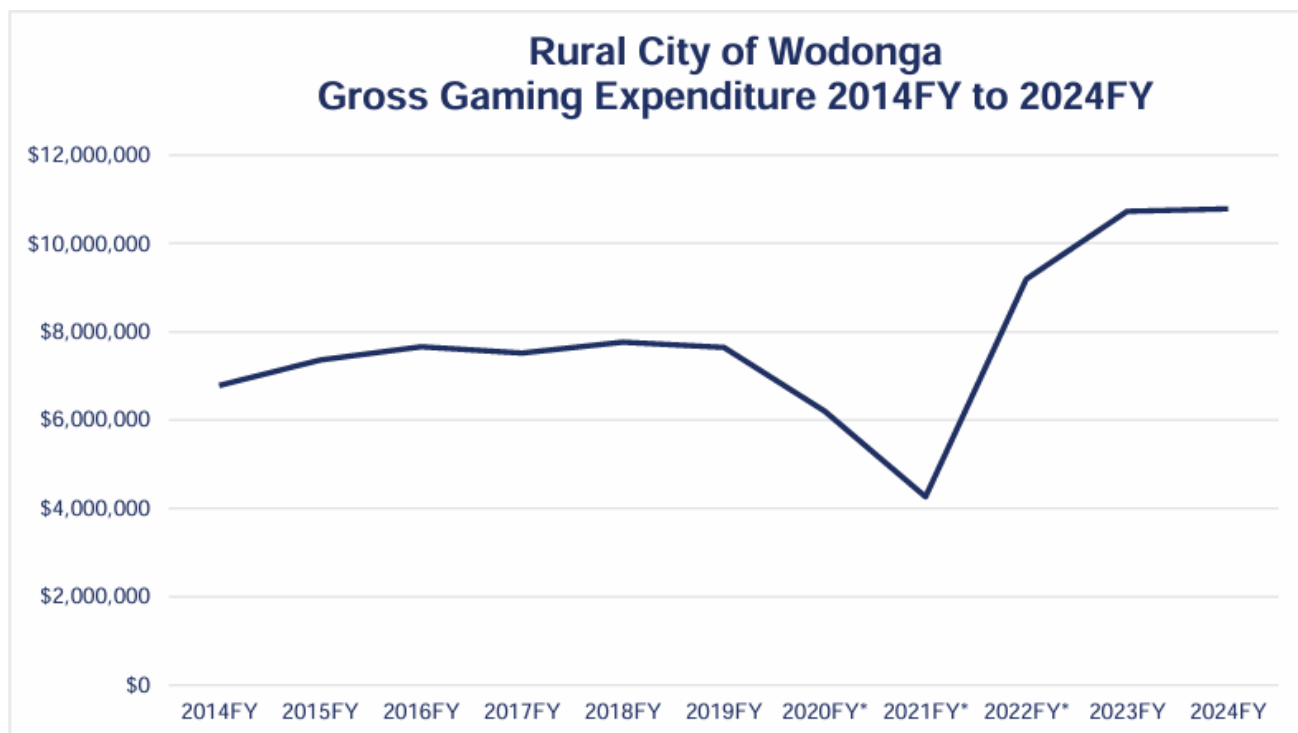
---

### 6.1 Expenditure Report

180. In his analysis of comparable venues in Victoria, Tim Stillwell of SW Accountants & Advisors, deemed it *reasonable to conclude that the level of gross gaming expenditure generated from an introduction of 70 EGMs at Club Wodonga would be between \$4,254,075 and \$5,199,425 per annum in the 4<sup>th</sup> year of trade with 80% of this achieved within the first 12 months of trade being between \$3,403,260 and \$4,159,540.*
181. Of this, it is determined reasonable that 60% of this gross gaming expenditure would be transferred from within the local area. Of the projected 60% transferred expenditure it is reasonable to anticipate that up to 50% of that would come from NSW venues in Albury and the remaining 50% will come from existing Victorian venues in Wodonga.
182. *This would equate to new gaming expenditure to the local area of between \$1,701,630 and \$2,079,770 per annum (in the 4<sup>th</sup> year of trade) and new expenditure of between \$1,361,304 and \$1,663,813 in the first 12 months of trade post installation of the 70 EGMs.*
183. The total transferred gaming expenditure would be between \$2,977,853 and \$3,639,598 per annum (in the 4<sup>th</sup> year of trade) and between \$2,382,282 and \$2,911,678 in the first 12 months trade post installation of the 70 EGMs (noting that approximately 50% of this includes existing gaming expenditure occurring at venues in Albury, NSW and the remaining 50% from existing venues in Wodonga, Victoria).
184. The estimated range of expenditure increase is calculated based on empirical evidence as explained in detail in the Expenditure Report.
185. The report provides in depth insight into the LGA and surrounding areas, with the key findings as follows:
- **Gaming Expenditure Analysis:**
    - Gross gaming expenditure from the proposed 70 EGMs is estimated between \$4.25m and \$5.19m annually by the fourth year.
    - Approximately 80% of the estimated gross expenditure is expected within the first year (\$3.4m to \$4.15m).
  - **New vs. Transferred Expenditure:**
    - 60% of the gross expenditure is projected to be transferred from other Victorian venues and existing venues in Albury (NSW), while 40% represents new expenditure to the region. Of this 60% transferred expenditure it is estimated that at least 50% of it will come from existing EGM expenditure in Albury venues and 50% from existing Wodonga venues.

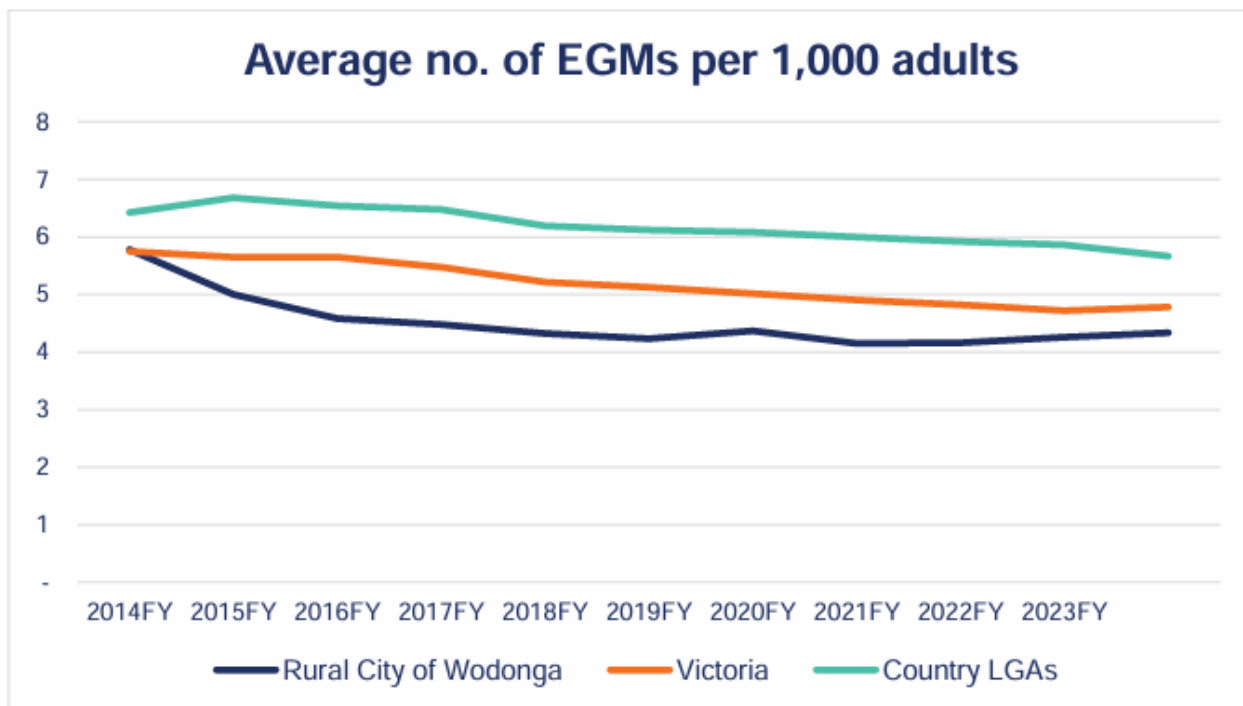
- Transferred expenditure is expected to range from \$2.9m to \$3.6m annually. It is therefore estimated that \$1.45m to \$1.8m of that will come from NSW venues and the same will be new gaming expenditure from patrons from within the primary 5km catchment, the 20km secondary catchment, outside of those catchments and visitors to the area as per the patron profile figures outlined elsewhere in this report.
- **Regional and Statewide Comparisons:**
  - Wodonga's average gaming expenditure per adult, gaming machine density per adult and average net machine revenue are lower than Victorian and country LGA averages.
  - The local gaming environment is influenced by competition from approximately 1,150 EGMs across the border in Albury, NSW.
- **Future Growth Projections:**
  - A 4% annual growth rate is applied to expenditure projections, based on historical trends in Wodonga and Victorian gaming data.

**Figure 27 |** Gross gaming expenditure 2014-202FY from Expenditure Report





**Figure 28 |** EGM density for the City of Wodonga



186. Analysis also concluded that, within the City of Wodonga:
- The current EGM density per 1000 adults is lower than the average for State and country LGA's;
  - The Net Machine Revenue (NMR) is lower than the average for State and country LGA's;
  - The net gaming expenditure per adult is well below the average for State and country LGA's (noting it records where spend occurs not where the person resides)
187. This report has considered the findings of the Expenditure Report and applied where relevant. It is understood that Tim Stillwell will present their findings to the VGCCC independently.
188. Please refer to the full Expenditure Report at Appendix 2 for detail of their assessment.

## 6.2 RSG Measures

189. The Club willingly accepts its responsibility to ensure responsible gaming at the Venue and will introduce the Gaming Policies and Procedures Manual including a number of practices consistent with the principles of harm minimisation.
190. The proposed Gaming Lounge has been specifically designed to comply with current best practice RSG measures and features. The layout was prepared in conjunction with ONYX (RSG and compliance experts). Refer to Appendix 4.
191. RSG initiatives implemented at Club Wodonga will include the following:
  - Self-Exclusion Program: easy access to self-exclusion options, allowing patrons to voluntarily ban themselves from gaming activities;
  - Responsible Gambling Officers (RGOs): trained RGOs monitor gaming areas, identify at-risk patrons and provide information on support services;
  - Signage and information: clear signage and brochures on display about gambling risks and available help resources, such as counselling services;
  - Mandatory RSG Training: staff working in the gaming room are required to have achieved RSG accreditation;
  - Welfare Checks: regular welfare checks on patrons showing signs of distress or prolonged play, encouraging breaks and providing support information;
  - Cash and ATM Restrictions: ATMs are placed away from gaming areas and cash withdrawals from credit accounts are prohibited to discourage impulse gambling;
  - Regular Audits and Reviews: regular audits of gaming practices to ensure compliance and identify improvement areas;
  - Venue Support Workers: Club Wodonga has regular contact with and refers patrons at risk of gambling harm to Venue Support Workers and Gateway Health;
  - Facial recognition technology: at the entrance to the gaming room; and
  - Club Wodonga Gaming Policies and Procedures (Manual): sets out RSG and gambling harm minimisation strategies, policies and procedures incorporating VGCCC mandated obligations.

## 7 Social and Economic Impacts

The following tables summarise all factors that have been considered in this application to establish a new 70 EGM Club venue. The impacts are indicated below, along with a decision factor and further emphasised by the colour scheme. A degree of judgement is required in weighing up the net benefits and disbenefits of this application, with the greater weight applied to those factors that have the largest impact on the community and certainty of outcome.

### 7.1 Economic Benefits

A review of the economic benefits of this application are summarised in Table 14 below:

**Table 14 |** Economic Impact Summary – Benefits

Economic Benefit	VGCCC Guidelines	Proposal and Supporting Factors	Weight Given (Significant, Moderate, Low, Marginal)
<b>Local Employment</b>	<i>Economic Benefit - Job Creation &amp; Employment Opportunities</i>	Creation of new full-time and part-time jobs to support expanded venue operations. Additional employment in hospitality, gaming, and administrative roles.	<b>Moderate</b>
<b>Local Business Support</b>	<i>Economic Benefit - Increased Business Activity &amp; Supply Chain Impact</i>	The club intends to prioritise using local trades and services for ongoing operations and venue expansion.	<b>Low</b>
<b>Supply Contracts</b>	<i>Economic Benefit - Increased Business Activity &amp; Supply Chain Impact</i>	Expansion of local supplier contracts, particularly for food, beverages, and maintenance.	<b>Low</b>
<b>Increased Economic Activity and Capturing “Leaked” Expenditure</b>	<i>Economic Benefit - Retaining Expenditure Within the Local Economy</i>	Significant gaming expenditure is expected to return from NSW venues, keeping revenue within Wodonga rather than being spent in Albury.	<b>Moderate</b>

		Increased venue patronage leading to additional spending in food, beverage, and entertainment.	
<b>Capital Investment and Venue Development</b>	<i>Economic Benefit - Capital Investment &amp; Venue Upgrades</i>	<p>Estimated \$6m investment in capital works to upgrade facilities.</p> <p>Improved venue amenities, including new sports bar, kids' play area, gaming lounge, café and alfresco dining.</p>	<b>Moderate</b>
<b>Community Contributions</b>	<i>Social Benefit - Charitable and Community Contributions</i>	<p>Establishment of the Club Wodonga Community Fund to distribute a minimum of \$150,000 annually to local organisations.</p> <p>Contributions to junior sports clubs, community welfare programs, emergency relief funds, and local events.</p>	<b>Significant</b>



## 7.2 Social Benefits

A review of the social benefits of this application are summarised in Table 15 below:

**Table 15 | Social Impact Summary – Benefits**

<b>Economic Benefit</b>	<b>VGCC Guidelines</b>	<b>Proposal and Supporting Factors</b>	<b>Weight Given</b> (Significant, Moderate, Low, Marginal)
<b>Enhanced Entertainment and Hospitality Offerings</b>	<i>Social Benefit - Enhanced Community Facilities</i>	<p>The venue will provide a diversified entertainment hub, attracting families, sporting groups, and community events.</p> <p>New food and beverage options will enhance the visitor experience.</p>	<b>Low to Moderate</b>
<b>Responsible Gaming Measures in Place</b>	<i>Social Benefit - Harm Minimisation Strategies</i>	<p>Implementation of harm minimisation strategies, including:</p> <ul style="list-style-type: none"> <li>- Self-exclusion programs;</li> <li>- Venue Support Workers (VSWs);</li> <li>- Mandatory Responsible Service of Gaming (RSG) staff training;</li> <li>- Onsite access to gambling support services; and</li> <li>- Implementation of a RSG Policy and Procedures Manual</li> </ul>	<b>Moderate to Significant</b>
<b>Diversification of Community Services</b>	<i>Social Benefit - Charitable and Community Contributions</i>	The club will provide discounted meals for seniors, ADF personnel, support for disadvantaged youth, and free venue hire for select community groups.	<b>Low</b>

<b>Positive Social Engagement with Community Groups</b>	<i>Social Benefit - Support for Local Community Initiatives</i>	Collaboration with local sporting clubs, veteran organisations (RSL), and youth programs.	<b>Moderate</b>
---	---	---	-----------------

### 7.3 Economic Disbenefits

A review of the economic disbenefits of this application are summarised in Table 16 below:

**Table 16 |** Economic Impact Summary – Disbenefits

Economic Disbenefit	VGCCC Guidelines	Proposal and Supporting Factors	Weight Given (Significant, Moderate, Low, Marginal)
<b>Potential for Increased Gambling-Related Harm</b>	<i>Social Disbenefit - Increased Risk of Gambling-Related Harm</i>	<p>Introduction of 70 new gaming machines may contribute to higher gambling losses in the community.</p> <p>Some of the projected new expenditure is likely to come from vulnerable individuals rather than solely from discretionary entertainment spending.</p>	<b>Low to Moderate</b>
<b>Risk of Economic Displacement</b>	<i>Economic Disbenefit - Diversion of Spending from Other Local Businesses</i>	Increased gaming expenditure may lead to a shift in spending from other local businesses (e.g., retail, cafes, other entertainment).	<b>Low</b>

<b>Redistribution of Gambling Revenue Rather Than New Economic Growth</b>	<i>Economic Disbenefit - Transferred vs. New Expenditure</i>	<p>A significant portion of the projected gaming revenue is "transferred expenditure" from other Victorian and NSW venues, rather than truly new spending.</p> <p>While it keeps revenue in Wodonga instead of Albury, it does not necessarily increase overall economic prosperity in the region.</p>	<b>Low</b>
---	--	--	------------

## 7.4 Social Disbenefits

A review of the economic benefits of this application are summarised in Table 17 below:

**Table 17 |** Social Impact Summary – Disbenefits

Social Disbenefit	VGCCC Guidelines	Proposal and Supporting Factors	Weight Given (Significant/Moderate/Low)
<b>Higher Exposure to Problem Gambling Risks</b>	<i>Social Disbenefit - Exposure to Problem Gambling</i>	<p>Wodonga has a moderate level of socio-economic disadvantage, increasing the risk of problem gambling among vulnerable groups.</p> <p>Studies show lower-income communities are at higher risk of gambling-related harm</p>	<b>Low to Moderate</b>

**Concerns from Community Groups & Policy Implications**

*Social Disbenefit - Inconsistency with Local Planning Policies*

Wodonga City Council has a Gambling Harm Prevention Policy, which emphasises a public health approach to reducing gambling harm.

**Low**

The introduction of new gaming machines may conflict with Council policies aimed at minimising gambling accessibility. Council acknowledges a well-established long-term 'Club' EGM gaming environment in Albury.

**No Community Survey Conducted**

*Social Disbenefit - Lack of Community Engagement & Transparency*

The lack of a formal community attitudinal survey means there is limited direct feedback on whether residents support or oppose the application. The value and/or weight attributed to these types of surveys has previously been considered to be of marginal assistance to the decision makers. The Town Planning application and VGCCC submission are required to be publicly advertised. It is noted that the Council has posted the proposal on its social media platforms and sought feedback. It is noted that numerous community groups have publicly supported the proposal

**Low**



## 8 Impacts of the COVID-19 Pandemic

### 8.1 Impacts of COVID-19 on Gambling Activity

192. Victorian, and more notably Melbourne, 'lockdowns' saw venues closed for a combined period of more than six months since the start of the pandemic.
193. Research on gaming participation during the COVID-19 pandemic found<sup>27</sup>:
- *Almost 1 in 3 survey participants signed up for a new online betting account during COVID-19, and 1 in 20 started gambling online*
  - *Even with limited access to venues, overall, participants gambled more often during COVID-19. The proportion who gambled 4 or more times a week increased from 23% to 32%.*
  - *Of concern, 79% of participants were classified as being at risk of, or already experiencing, gambling-related harm*
  - *Key experts noted that the temporary closure of pokies venues had had immediate benefits for some people who gamble, including more money for essential items and increased savings*
  - *Around half of the survey participants reported that their physical and/or mental health had been negatively affected during COVID-19.*
194. The study notes that whilst many sports and other wagering-related activity remained relatively stable through COVID-19 times, *"there were statistically significant decreases in gambling on most land-based products during the restrictions, including:*
- *poker/electronic gambling machines or 'pokies' (before 35%, during 14%)"*<sup>28</sup>
195. When the Victorian Government released its roadmap out of COVID restrictions<sup>29</sup>, it permitted retail betting and electronic gaming venues in Regional Victoria to reopen when state vaccination rates record 80% of the population aged 16 and over as being fully vaccinated.
196. At such time, venues were eligible to reopen their gaming facilities to fully vaccinated patrons with an indoor density quotient (DQ) of 4 and a cap of 150 persons indoors, and a density quotient of 2 and 500 cap outdoors.
197. It is noted these caps were not in addition to the hospitality limits, hence venues were to ensure these patronage caps and density quotients are considered for the premise in its entirety.

<sup>27</sup> 'Gambling in Australian during COVID-19 – Research Summary', Rebecca Jenkinson, Kei Sakata, Tayyab Khokhar, Rukhsana Tajin, Uma Jatkar, Australian Gambling Research Centre, October 2020, page 1

<sup>28</sup> Gambling in Australian during COVID-19 – Research Summary' – page 3

<sup>29</sup> *Victoria's Roadmap: Delivering the National Plan, Summary of proposed restriction levels - Regional Victoria*, [https://www.premier.vic.gov.au/sites/default/files/2021-09/Roadmap\\_Regional.pdf](https://www.premier.vic.gov.au/sites/default/files/2021-09/Roadmap_Regional.pdf)

198. Following the uptake of vaccinations by the Victorian public the capacity restrictions were removed in October 2021. At the time of writing this report, venue capacities and operating hours due to Covid are no longer restricted by the Victorian Government. The long-term impact of these closures and restrictions to Club Wodonga and the City of Wodonga is currently unknown.

## 9 Conclusion

---

**I have made all the enquiries that I believe are necessary and applicable to this report and have not to my knowledge withheld any information that might be considered relevant.**

---

199. Upon weighing up the positive and negative elements of the application, it is considered that the key social and economic benefits of the application are:
- Establishment of a community focussed Club hospitality venue in Wodonga;
  - Creation of community contributions program that is flexible enough to ensure that a wide and diverse range of community groups can be supported and benefit financially;
  - Creation of 6 FTE hospitality jobs in Wodonga with priority going to suitably qualified and experienced locals;
  - Investment of \$6m with local trades to renovate the current Huon Hill Hotel to create the Club Wodonga venue and offer a broader range of hospitality services in a higher quality venue;
  - Establishment of a Club EGM venue with a strong focus on RSG and best practice gaming policies and procedures means it become a lower risk problem gambler proposition; and
  - The fact that a significant proportion of the projected gaming expenditure is going to be transferred from existing well-established Wodonga and Albury gaming venues on the basis that Club Wodonga will offer a Club venue not currently available to locals in Wodonga.
200. The key disbenefit is recognised to be a potential increase in problem gambling. Any noticeable change in problem gambling as a direct result of this application is deemed to be negligible, given the following factors:
- The profile of a Club venue is less attractive to problem gamblers given the strong focus on RSG and sign-in requirements;
  - The relatively low overall percentage of actual new gaming expenditure is likely to come from patrons falling into the lower risk categories in terms of problem gambling risk; and
  - The long-term exposure to EGM gaming for those living within the primary catchment of the proposed venue mean that those wanting to gamble have had the opportunity to do so for more than 40 years. The proposed EGM offering is not a new trend for vulnerable locals that has previously been unavailable, but the establishment of a new Club venue will be and Club's with a strong RSG focus and a broader range of hospitality services on offer are not the preferred venue for problem gamblers based on the studies highlighted in this report.

201. It is submitted that the proposed benefits listed above outweigh any estimated negligible increase in problem gambling.
202. It is my opinion that based on the positive social and economic impacts of the proposal and the **no net detriment result**, that the application by the Applicant to create a new Club gaming venue and install 70 EGMs at Club Wodonga can be supported.

A handwritten signature in black ink, appearing to read 'NB Anderson', with a stylized flourish at the end.

**Nick Anderson**  
**Managing Director**



## 10 Appendices

10.1 Nick Anderson – Curriculum Vitae

10.2 Expenditure Report by SW Accountants & Advisors

10.3 Harm Minimisation Report by DNS Specialist Services

10.4 ONYX Gaming Layout Plan

10.5 Development Plans by BSPN Architects

10.6 Quest and Bistro Post Code Counts

10.7 Charitable Objects

10.8 Community Contributions