



DORSET GARDENS PROPOSED INCREASE IN ELECTRONIC GAMING MACHINES SOCIAL AND ECONOMIC IMPACT ASSESSMENT

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Dorset Gardens Proposed Increase in Electronic Gaming Machines
Social and Economic Impact Assessment

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Acronyms

LGA	Local government area
SEIFA	Socio-economic Index for Areas
SEIS	Social and economic impact statement

1 Introduction

1.1 Background

1. Maroondah City Council (Council) has been notified of an application to the Victorian Gambling and Casino Control Commission (VGCCC) to increase the number of electronic gaming machines (EGMs) by eight from 97 to 105 at the Dorset Gardens Hotel (the venue), 335 Dorset Road, Croydon (the proposal site).
2. On 8 October 2025 I was engaged by Council to prepare a Preliminary Opinion Report (report) discussing the potential impacts of the proposal on the wellbeing of the community.
3. On 6 November 2025 I was engaged by Council to prepare a full Social and Economic Impact Assessment (SEIS).

1.2 Purpose of SEIS

4. The purpose of the SEIS is:
 - i. To identify the potential social and economic impacts of the proposal on the wellbeing of the community considering potential risk and protective factors.
 - ii. To identify mitigation measures which may reduce the potential risks and harms, and increase the potential protective factors and benefits associated with the proposal, should the Commission be of mind to approve the application.

1.3 Methodology

5. The preparation of the SEIS involved the following:
 - Review of the Social and Economic Impact Assessment Dorset Gardens Hotel prepared by Urbis and appendices.
 - Inspection of the proposal site and surrounds conducted on Monday 13 October 2025 between 12pm and 12.30pm.
 - Review of relevant Council plans, strategies and policies.
 - Review of relevant scientific and academic research (refer to Appendix 1).
6. The SEIS has been prepared within a contemporary social impact assessment framework consisting of specific principles, processes and methodologies (refer to Appendix 2).

2 Dorset Gardens Hotel

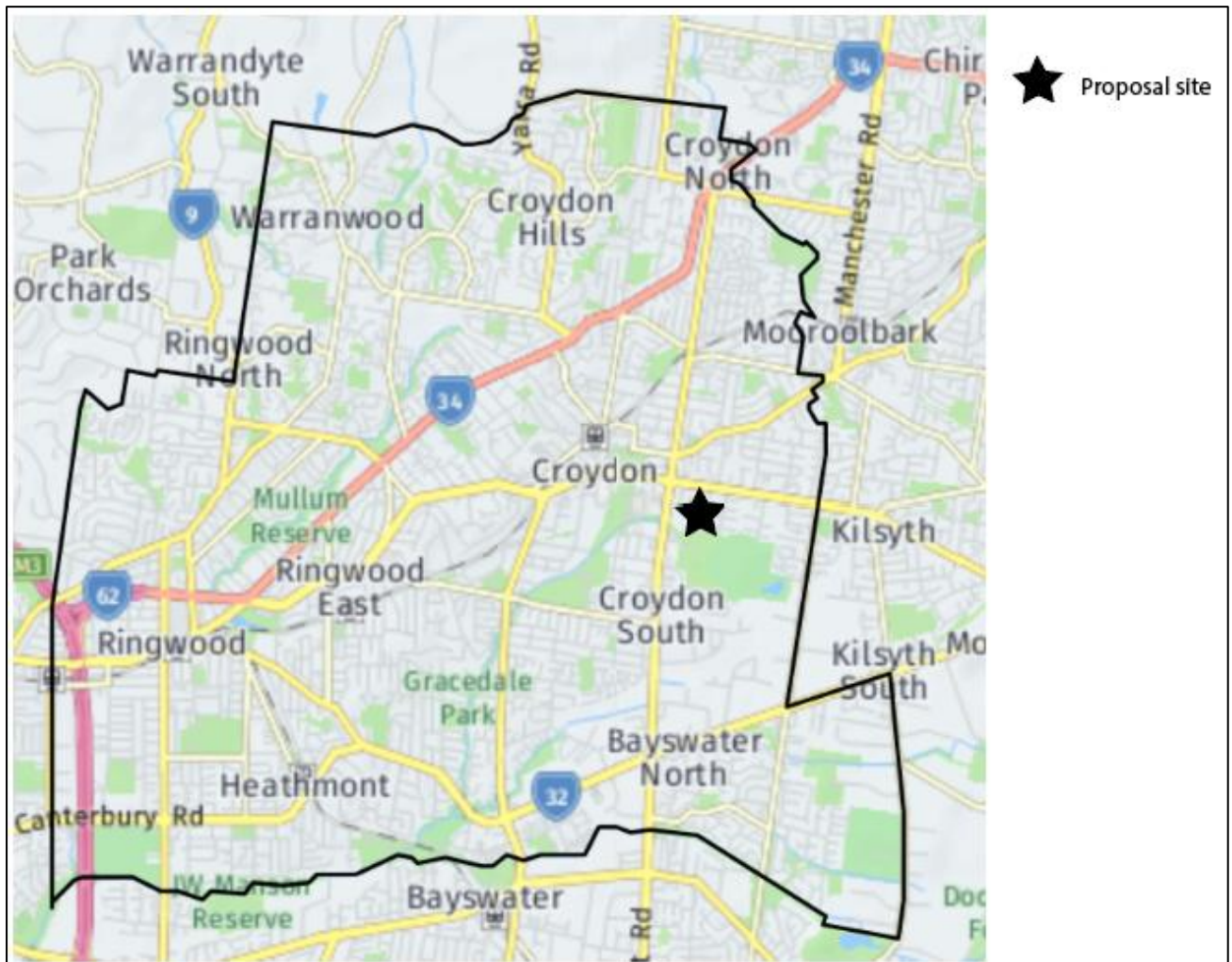
7. This section describes the existing location, land use context, design, operations and catchment of the Dorset Gardens Hotel (the venue).

2.1 The proposal site

2.1.1 Location

8. The proposal site is located in the City of Maroondah which is bounded by the City of Manningham in the north, City of Whitehorse to the west, Shire of Yarra Ranges to the east and City of Knox to the south.
9. It is situated at 335 Dorset Road, Croydon (refer to Figure 1).

Figure 1 - Location of proposal site



Source: SymPlan and i.d consulting

2.1.2 Land use mix

Adjoining

10. The proposal site is adjoined by the following land uses:

- Dorset Gardens Motel
- Fawknor Bingo Centre in a separate building connected to the venue by a walkway, operated by a separate entity.

Surrounding

11. The predominant land use surrounding the proposal site is residential.

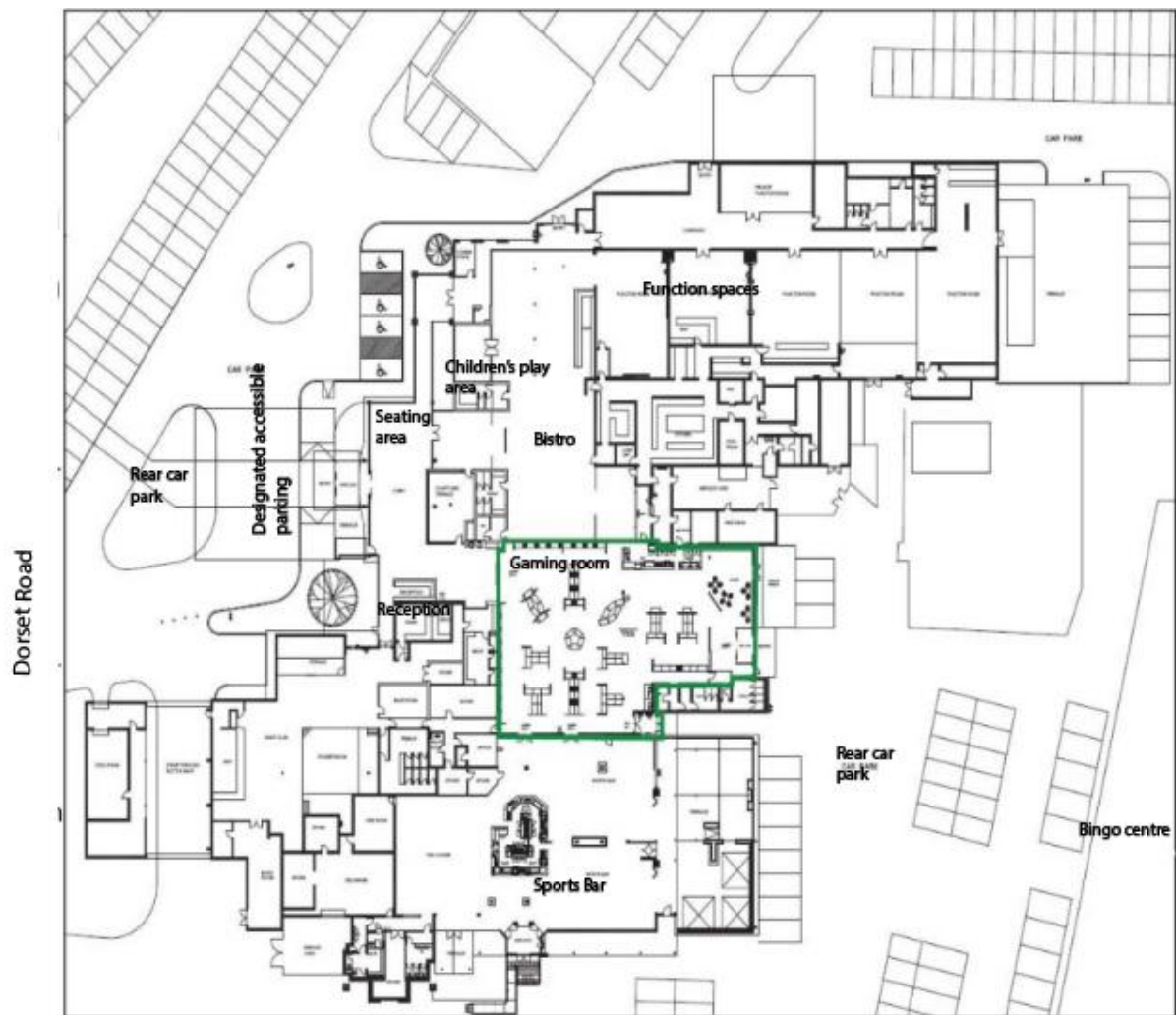
12. Swinburne University of Technology Croydon specialising in trades courses is located 400m to the north-west of the proposal site.

2.2 Venue services and facilities

13. The venue provides the following facilities (refer to Figure 2):

- Bistro with capacity for 350 patrons serving lunch and dinner seven days a week.
- Children's play area adjacent to the bistro.
- Sports lounge including TAB and adjoining dedicated outdoor smoking area. This facility adjoins the existing gaming room. Food and beverages are available in the sports lounge.
- Gaming room with 97 EGMs, dedicated outdoor smoking area and internal lounge.
- Entertainment area/nightclub with dedicated outdoor smoking area and separate entrances.
- Flexible function spaces accommodating up to 200 people with adjacent terrace.
- Adjoining motel with 45 units.
- Drive through bottle shop.

Figure 2 – Venue Layout



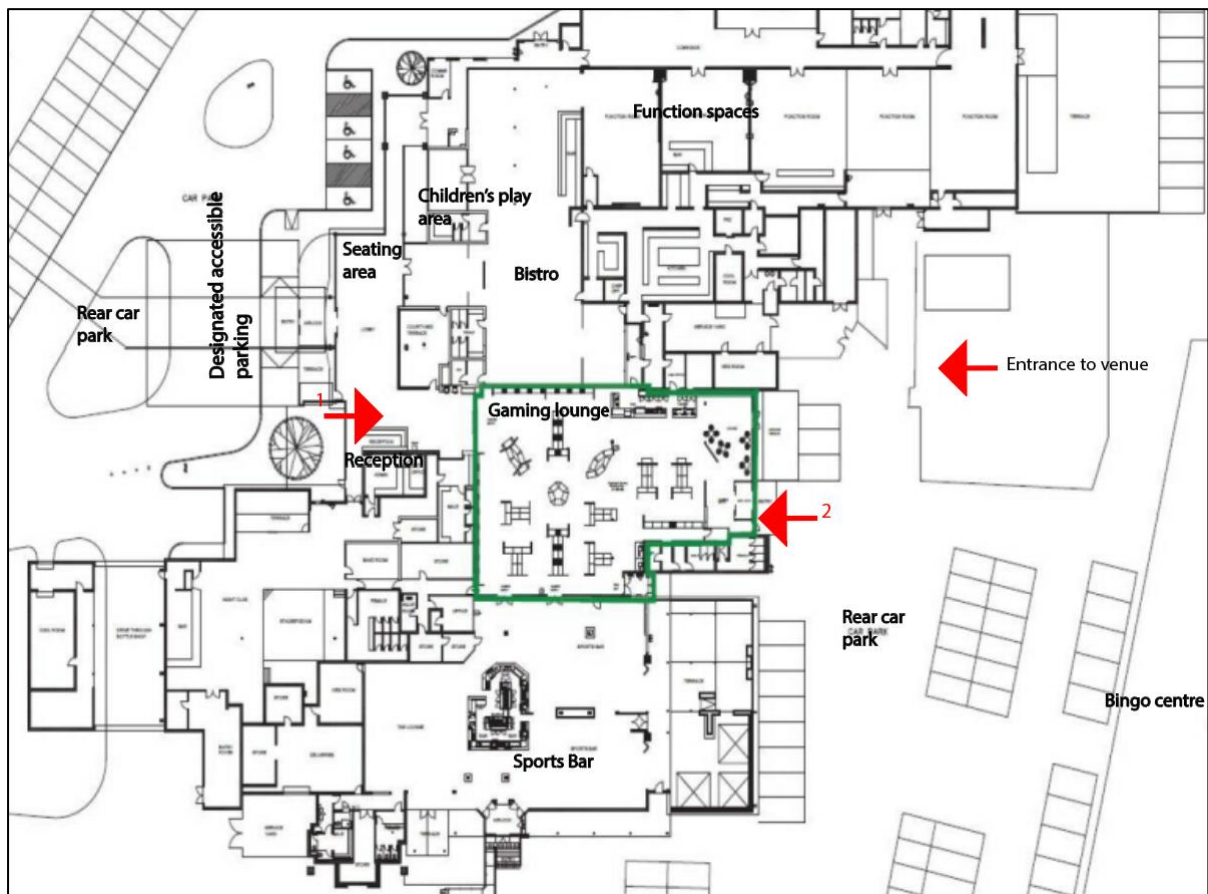
Source: SymPlan and Urbis

14. The venue provides leisure and entertainment activities including live entertainment and music events, poker and pool nights, quiz nights, festive gatherings and bingo.

2.3 Venue layout

15. There are two entrances to the venue (refer to Figure 3).
1. One facing Dorset Road off the front car park.
 2. One off the rear car park

Figure 3 – Entrances to the venue



Source: SymPlan and Urbis

16. There are four entrances to the gaming room (refer to Figure 4):

1. Off reception (internal)
2. Off the rear car park (external)
3. From the sports lounge (internal)
4. From the sports lounge (internal)

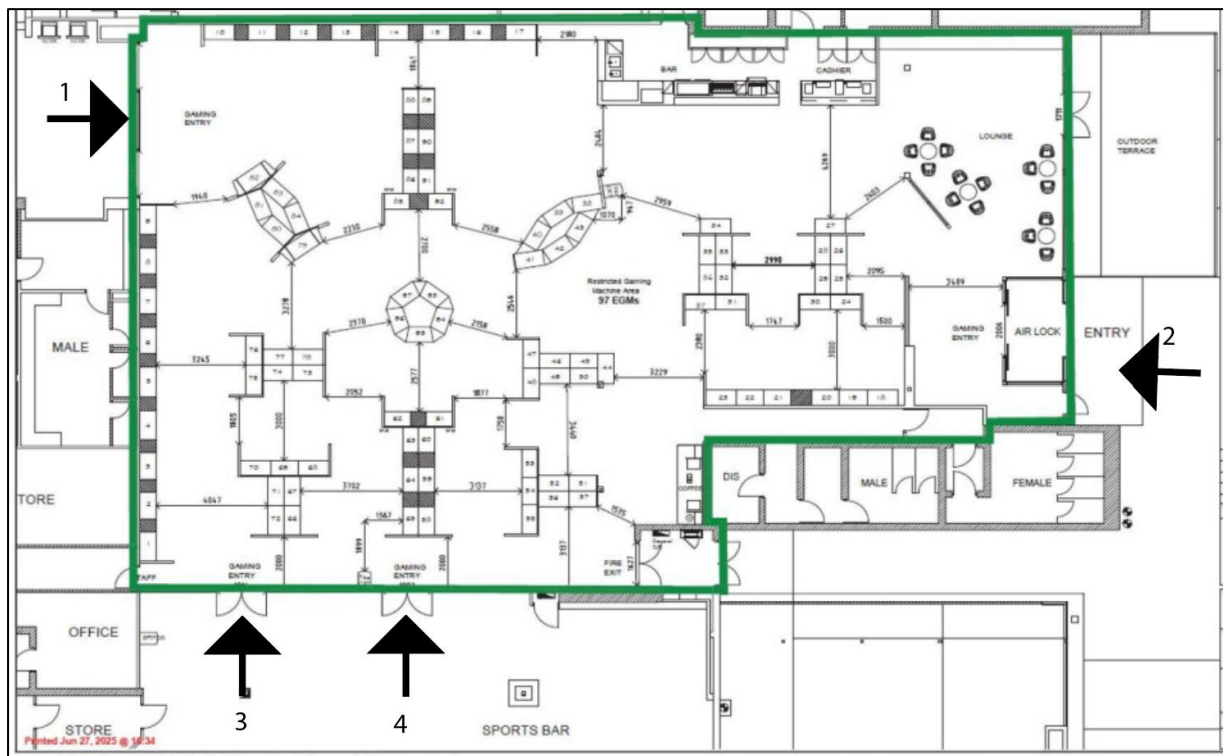
17. The entrance off reception (1) has a partial screen.

18. The two entrances to the gaming room from the sports lounge (3 and 4) have transparent glass doors which were wedged open during the inspection.

19. The entrance off the rear car park (4) has transparent double glass doors.

20. Views into the gaming room are apparent through all four entrances.

Figure 4 – Internal and external entrances to the gaming room



Source: SymPlan and Urbis

2.4 Venue operations

21. The venue operates a courtesy bus.
22. There is no mention in the application documentation of any of the function spaces being used by community groups free of charge.
23. Patrons are encouraged to purchase food and beverages for consumption away from the EGMs.
24. Patrons may reserve an EGM for a maximum of ten minutes. Patrons are not permitted to use more than one EGM at a time or reserve one EGM to use another one.
25. The use of EGMs does not accrue credits on the venue's Loyalty Rewards Program.
26. The Urbis SEIS indicates the following in relation to community contributions (p11):

Based on community contributions data provided by venue management between 2020-2024, a total of \$133,255 in cash donations have been made by the venue. Excluding 2021 due to COVID restrictions, Dorset Gardens Hotel donated \$31,700 annually on average to local charities, sports clubs and other community groups over the last five years or so.

27. There is no indication in the application documentation on the allocation of these contributions (i.e. who are the recipients), and the nature of the in-kind contributions (i.e. does it relate to free room hire, vouchers etc.)
28. Hours of operation are:
 - Gaming room: Monday to Sunday 10am to 4am
 - Bistro: Monday to Sunday 11am to 11pm
 - Sports Bar: Monday to Sunday 11am to 1am

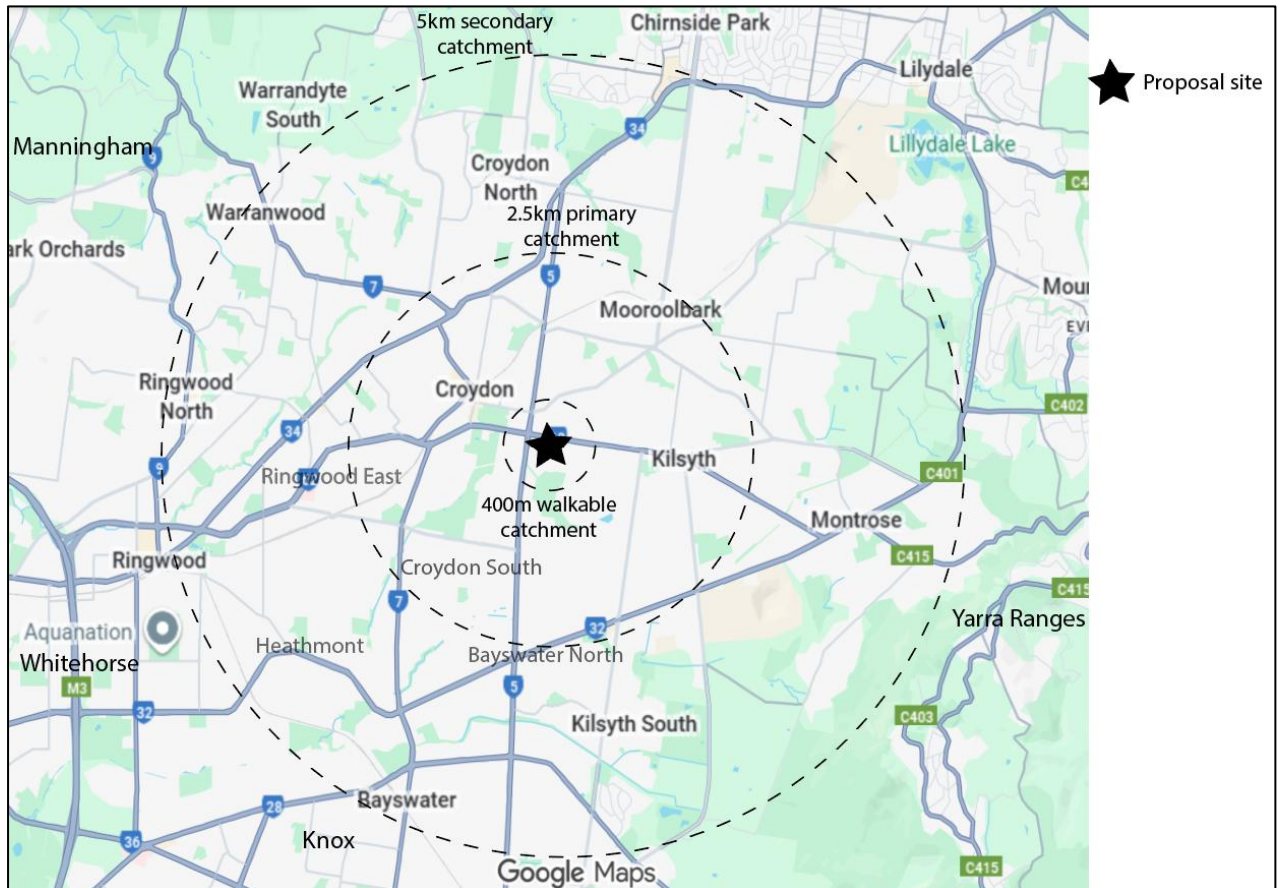
- Bottle Shop Monday to Sunday 9am to 12midnight
- Entertainment area: Friday 9pm to 4am, Saturday 9pm to 5am
- Reception: 10am to 4am

2.5 Venue catchments and patron profile

2.5.1 Catchments

29. The suburbs in the venue's 400 metre walkable, 2.5 kilometre and 5 kilometre catchments are illustrated in Figure 5.

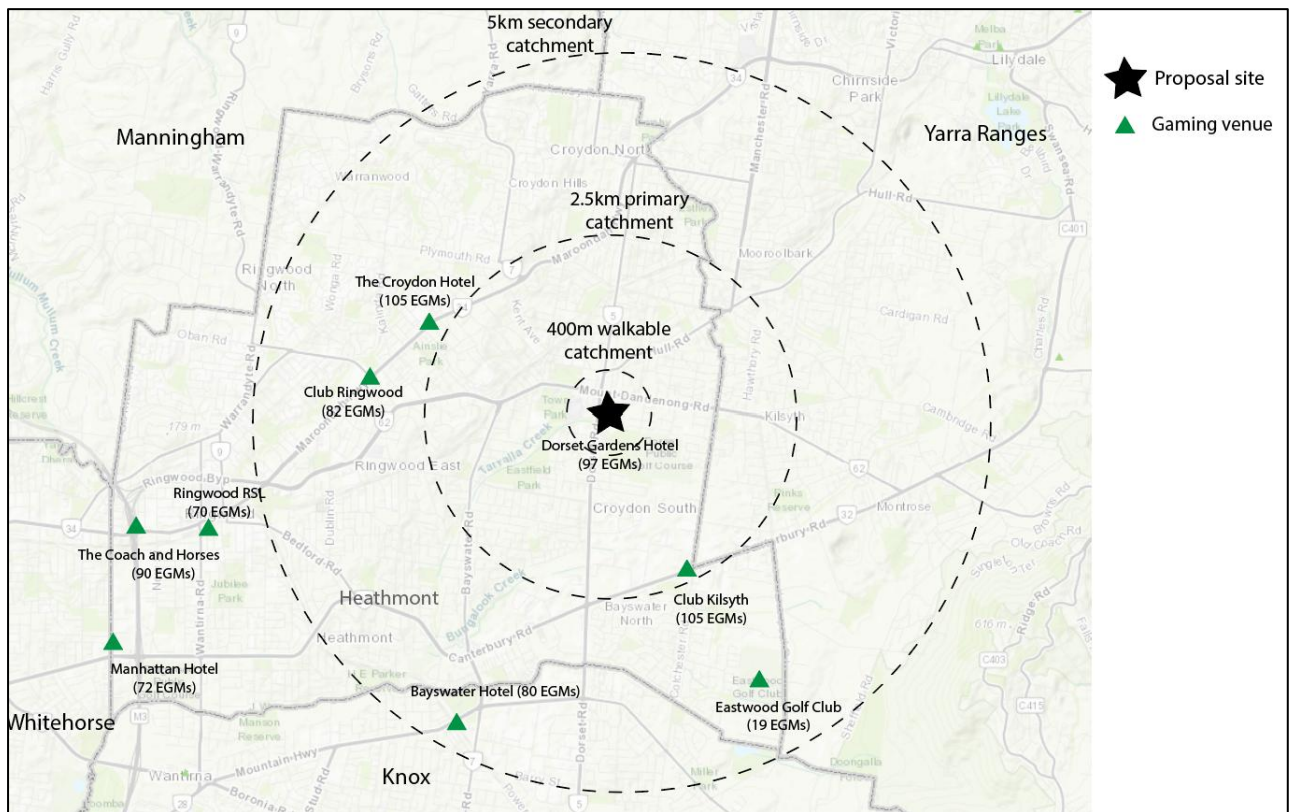
Figure 5 – Gaming venues in proposal site's primary and secondary catchments



Source: SymPlan, Google Maps and VGCCC

30. There is one gaming venue in the proposal site's primary catchment (Club Kilsyth with 105 EGMs) and a further four in the proposal site's secondary catchment, one of which is located in the City of Knox (refer to Figure 6).
31. The closest venues to the proposal site are the Croydon Hotel and Club Kilsyth, both of which have 105 EGMs (refer to Figure 6).

Figure 6 – Gaming venues in proposal site's catchments

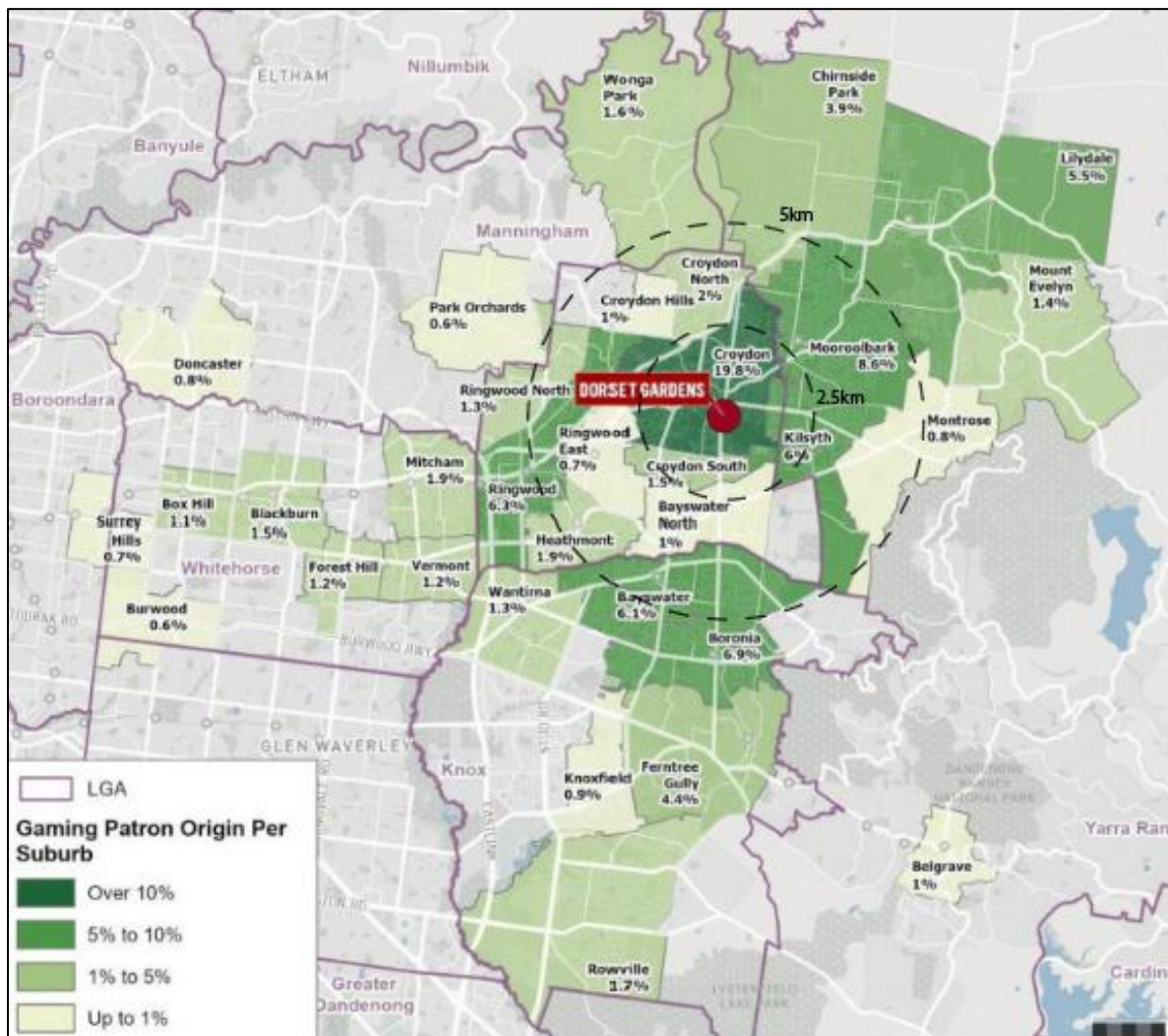


Source: SymPlan and VGCC

2.5.2 Patron Profile

32. The venue is patronised by several community groups consisting of older people, charity groups, and aged care and disability groups.
33. The courtesy bus is used to transport these community groups to and from the venue.
34. The facilities are used by families and young people, older people, and trades people.
35. The highest proportions of the venue's patrons reside in Croydon and Kilsyth (refer to Figure 7).

Figure 7 – Origin of gaming room patrons 22 July 2025 – 4 August 2025



Source: Urbis SEIS and SymPlan

3 The proposal

36. Key aspects of the proposal include the following (refer to Table 1 and Figure 8).

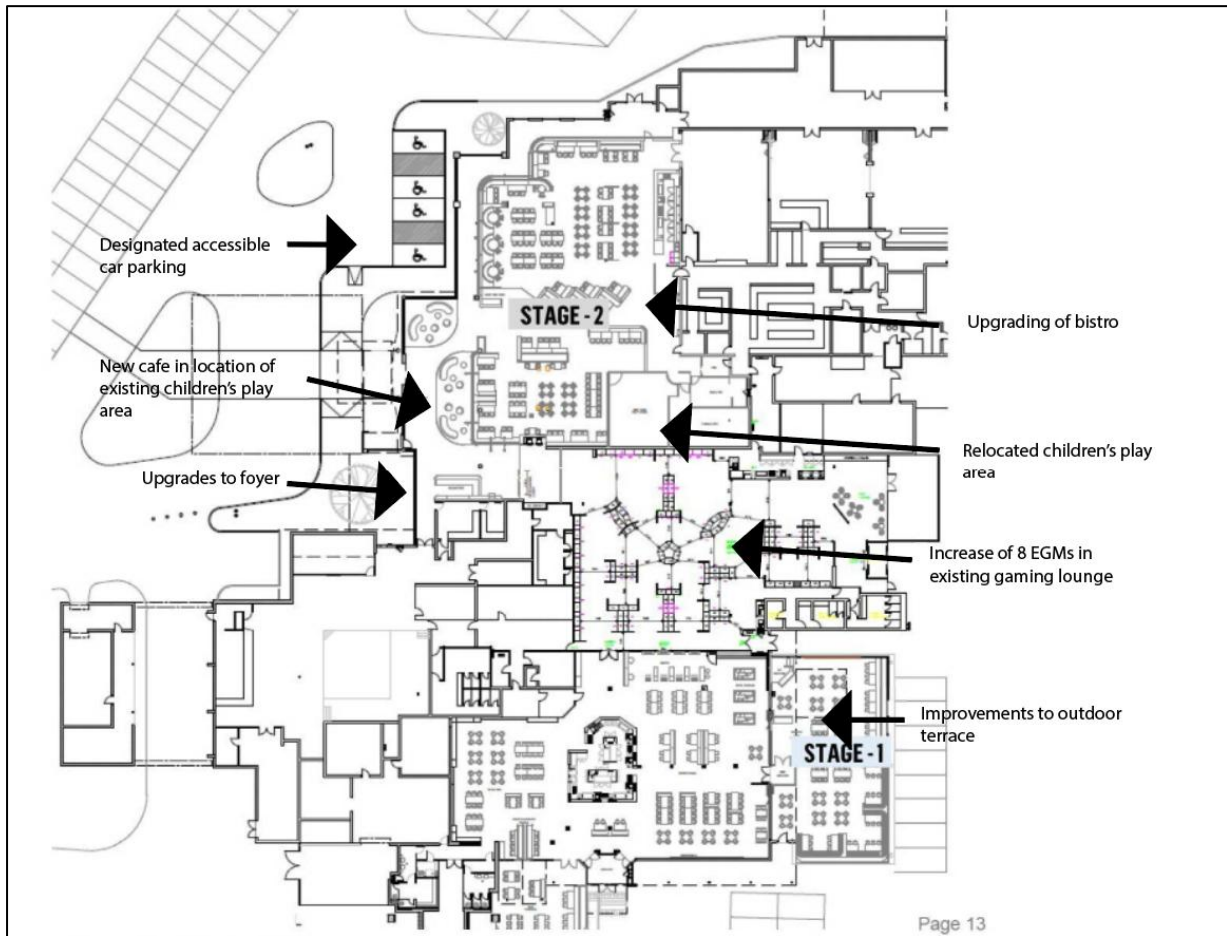
Table 1 - Proposal

Factor	Details
Number of venues:	No change.
Number of EGMs:	Net increase of eight from 97 to 105 at both the venue and in the City of Maroondah.
Operating hours:	No change to existing hours which are as follows: <ul style="list-style-type: none"> • Gaming room: Monday to Sunday 10am to 4am • Bistro: Monday to Sunday 11am to 11pm • Sports Bar: Monday to Sunday 11am to 1am • Bottle Shop Monday to Sunday 9am to 12midnight • Entertainment area: Friday 9pm to 4am, Saturday 9pm to 5am • Reception: 10am to 4am
Additional weekly patrons:	No information provided.
Additional gross player loss:	\$993,771 - \$1,344,514 in the first 12 months of trade.
Transferred player loss:	40 per cent i.e. 60 per cent will be new player loss, predicted to be predominantly from the Croydon Hotel. ¹
Net increase in player loss:	\$596,263 to \$806,708 in the first 12 months of trade.
Supply contracts:	No information provided
External complementary expenditure:	No information provided
Capital expenditure:	\$6.7 million associated with two stages of works.
Employment:	An increase of 8-10 full-time equivalent employees across the venue. The URBIS SEIS (page 41) suggests most of these jobs are likely to be filled by local residents.
Proposed additional services and facilities:	New cafe at entrance to the bistro.
Upgrades (as per Urbis SEIS page 13):	<p>Refurbishments to the bistro include segmentation into different zones, upgrading interior, enhancement of connection between bistro and function room.</p> <p>Extension to the bistro which is assumed to incorporate the existing children's play area and result in the inclusion of a cafe.</p> <p>Alterations to the dedicated outdoor smoking area off the sports bar to include a new large screen TV and upgrading of the décor.</p>

¹ ShineWing Expenditure Report paragraph 10.7

Factor	Details
	<p>Enhancement and relocation of the children's play area to adjoin the gaming room.</p> <p>Refurbishment of the foyer and external drop-off/pick up areas.</p> <p>Improved accessibility through designated disabled-only parking spots.</p> <p>LED installations.</p> <p>Sound insulation in the gaming room.</p>
Community contributions:	<p>The witness statement of Joseph Scerri states at paragraphs 48 and 49 that "Whilst there have been some deviations in recent years due to Covid, the venue generally donates around \$20,000 in cash each year to a range of local community and sporting groups. As part of this application, the applicant is willing to commit a condition enshrining these existing donations, together with an additional \$10,000 of in-kind donations per annum for a total of \$30,000 in donations per year."</p> <p>The Urbis SEIS page 11 states "Going forward, the venue aims to enshrine their support to the wider community by guaranteeing by way of condition their annual donation amount of \$20,000, along with a further \$10,000 of in-kind donations."</p>

Figure 8 – Proposal details



Source: SymPlan and Urbis SEIS

37. The Urbis SEIS (p41) states “While these works may proceed in time, without the additional profitability generated by the extra EGMs, the investment will be delayed”.

4 Project context

38. This section describes the community, gaming and strategic context within which the proposal site is located and the venue operates.

4.1 Population size and growth

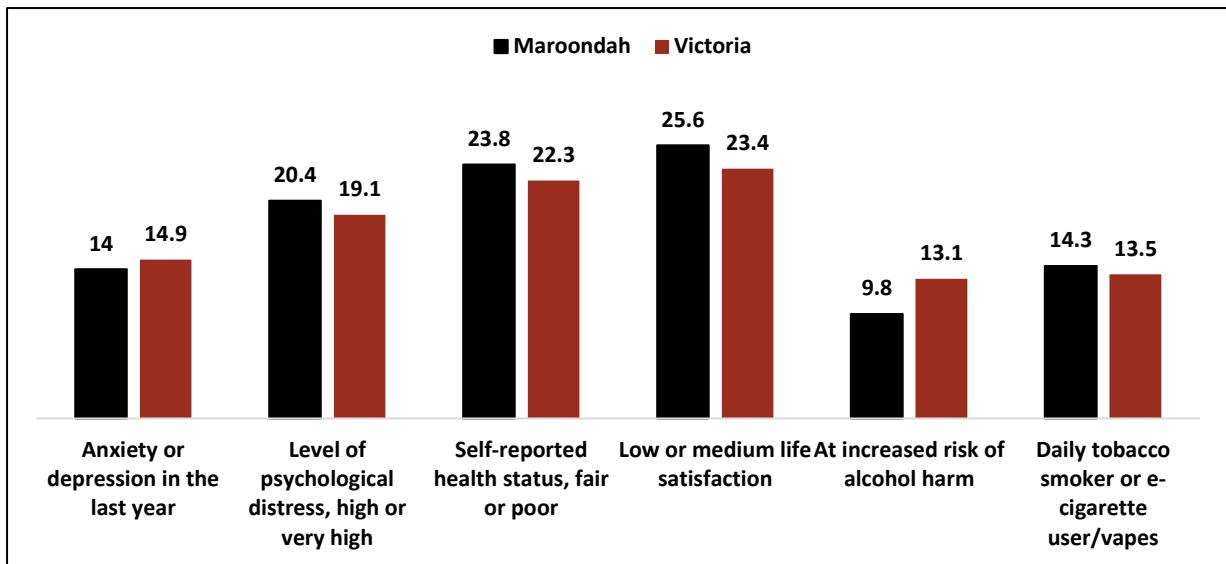
39. The estimated resident population in the City of Maroondah for 2025 is 120,304.²

40. The municipality's population is expected to grow by 23,894 to 139,974 people between 2026 and 2046 with a largest absolute increase occurring in Ringwood and Croydon.

4.2 Health and wellbeing

41. Compared to Victoria, the City of Maroondah has a higher proportion of people with a fair or poor self-reported health status, low or medium life satisfaction, high or very high psychological distress and people who are daily smokers or e-cigarette/vape users (refer to Figure 9).

Figure 9 – Key health indicators, City of Maroondah and Victoria

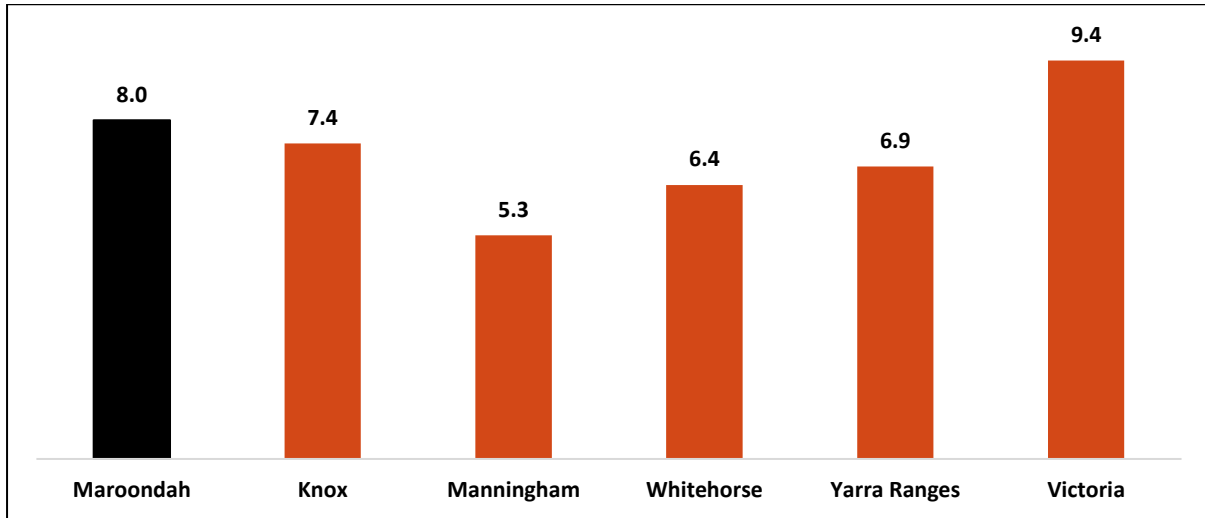


Source: Victorian Population Health Survey 2023

42. The City of Maroondah has a higher proportion of its population receiving welfare payments (8 per cent) compared to all adjoining municipalities (Knox 4 per cent, Manningham 5.3 per cent, Whitehorse 6.4 per cent and Yarra Ranges 6.9 per cent). Refer to Figure 10.

² ABS Census of Population and Housing 2021, compiled by .id consulting

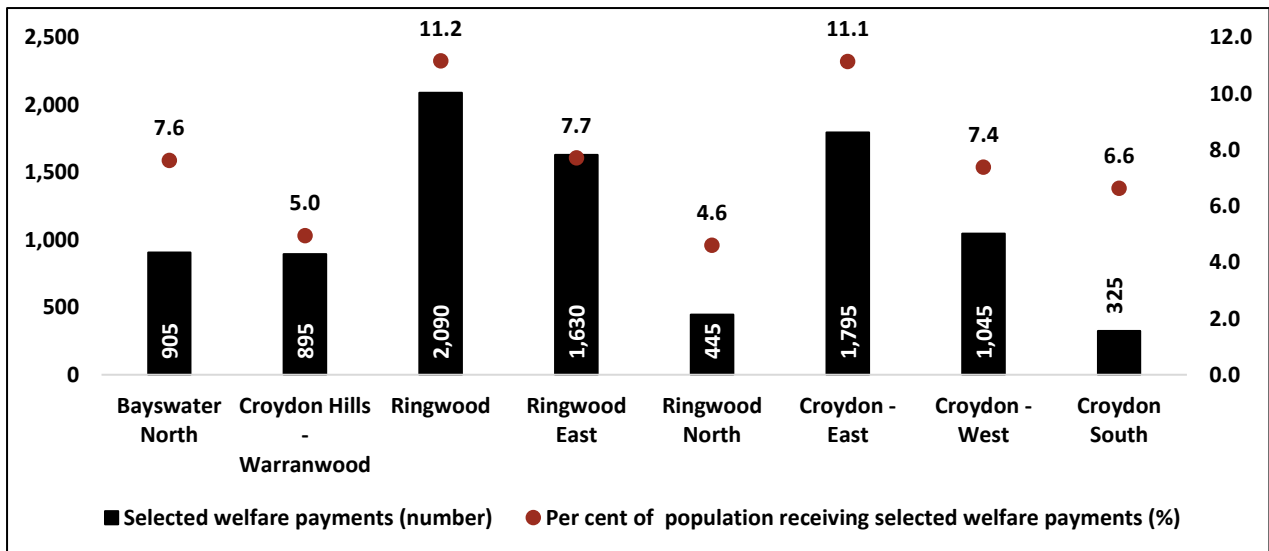
Figure 10 – Per cent of population receiving selected welfare payments³, City of Maroondah and adjoining municipalities, June 2025



Source: DSS [DSS Benefit and Payment Recipient Demographics - quarterly data - Dataset - data.gov.au](#)

43. The Statistical Areas 2 of Ringwood East and Croydon Hills-Warranwood have the most selected welfare payments in the municipality (21,132 and 18,059 respectively). Refer to Figure 11.
44. The Statistical Areas 2 of Ringwood and Croydon-East have the highest proportion of their populations receiving welfare payments (11.2 per cent and 11.1 per cent respectively). Refer to Figure 11.

Figure 11 - Selected welfare payments by Statistical Area 2 (number and per cent), City of Maroondah, June 2025



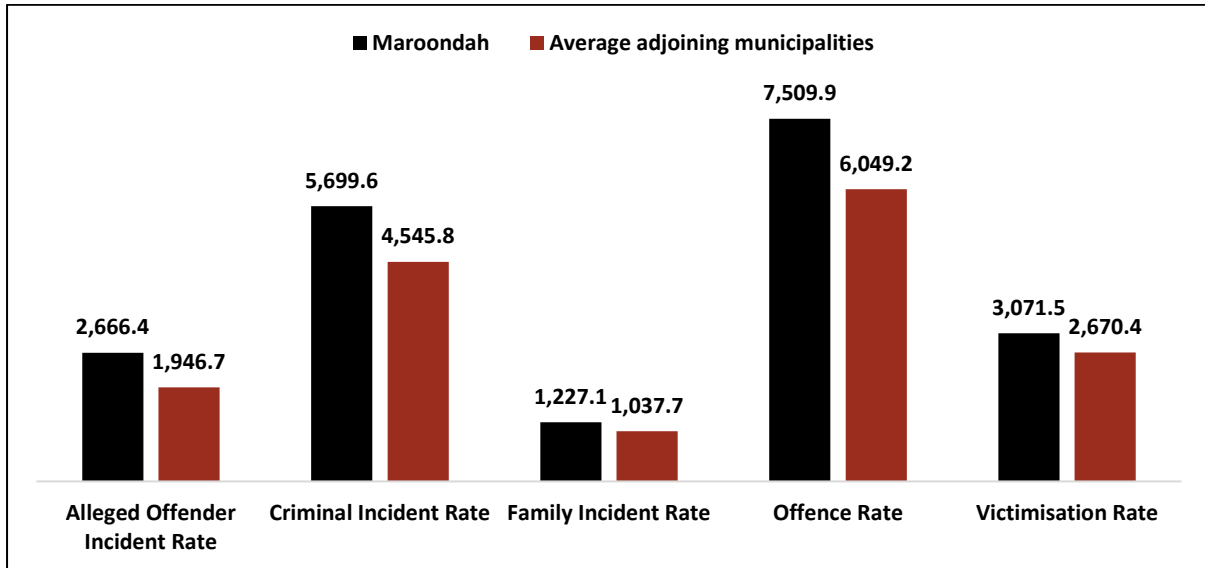
Source: DSS [DSS Benefit and Payment Recipient Demographics - quarterly data - Dataset - data.gov.au](#)

³ JobSeeker Payments and Low Income Card recipients

4.2.1 Crime and safety

45. In March 2025, compared to average for the adjoining municipalities, the City of Maroondah had a higher rate of alleged offender incidents, criminal incidents, family incidents, total offences and victimisations (refer to Figure 12).

Figure 12 – Selected crime rates per 100,000 people, City of Maroondah and adjoining municipalities, March 2025

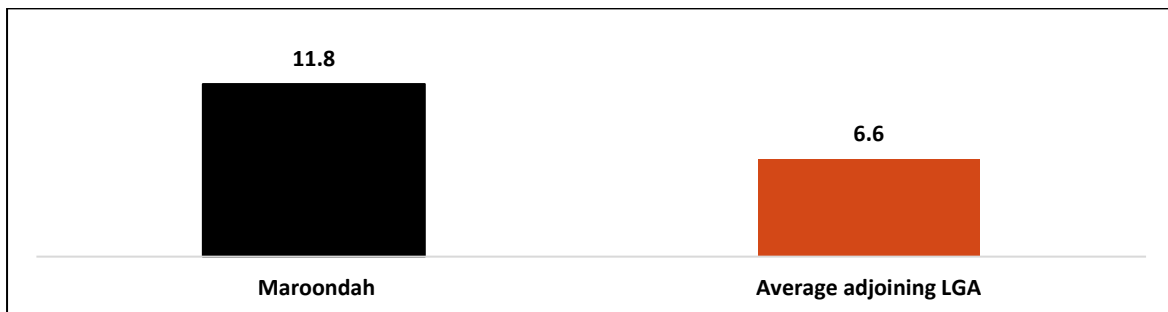


Source: Crime Statistics Agency Victoria

46. Between June 2021 and June 2025:

- The growth in criminal incidents per 100,000 people was significantly higher in the City of Maroondah compared to the average for the adjoining municipalities (11.8 per cent and 6.6 per cent respectively). Refer to Figure 13.
- The growth in family incidents in the City of Maroondah was higher than the average for adjoining municipalities (refer to Figure 14).

Figure 13 – Per cent growth in criminal incidents, City of Maroondah and adjoining municipalities, June 2021- June 2025



Source: Crime Statistics Agency Victoria

Figure 14 – Per cent growth in family incidents per 100,000 people, City of Maroondah and adjoining municipalities, June 2021- June 2025

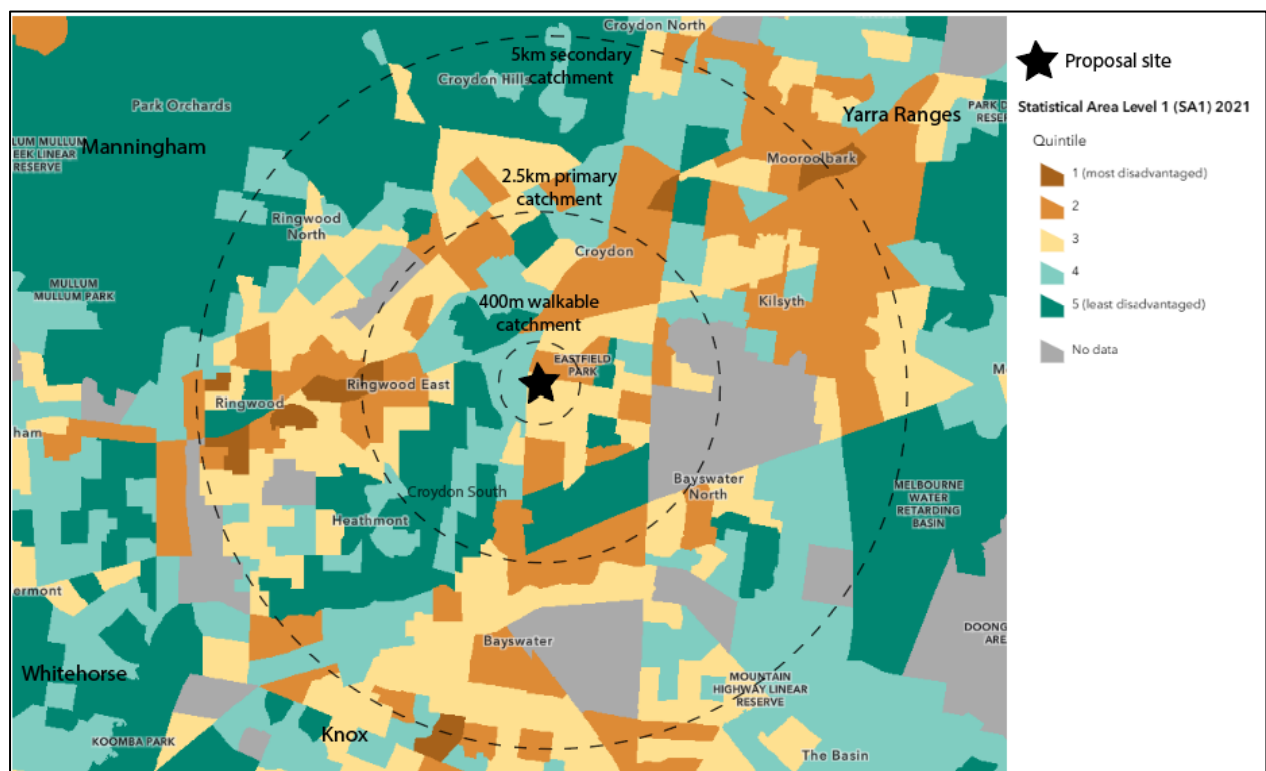


Source: Crime Statistics Agency Victoria

4.2.2 Financial vulnerability

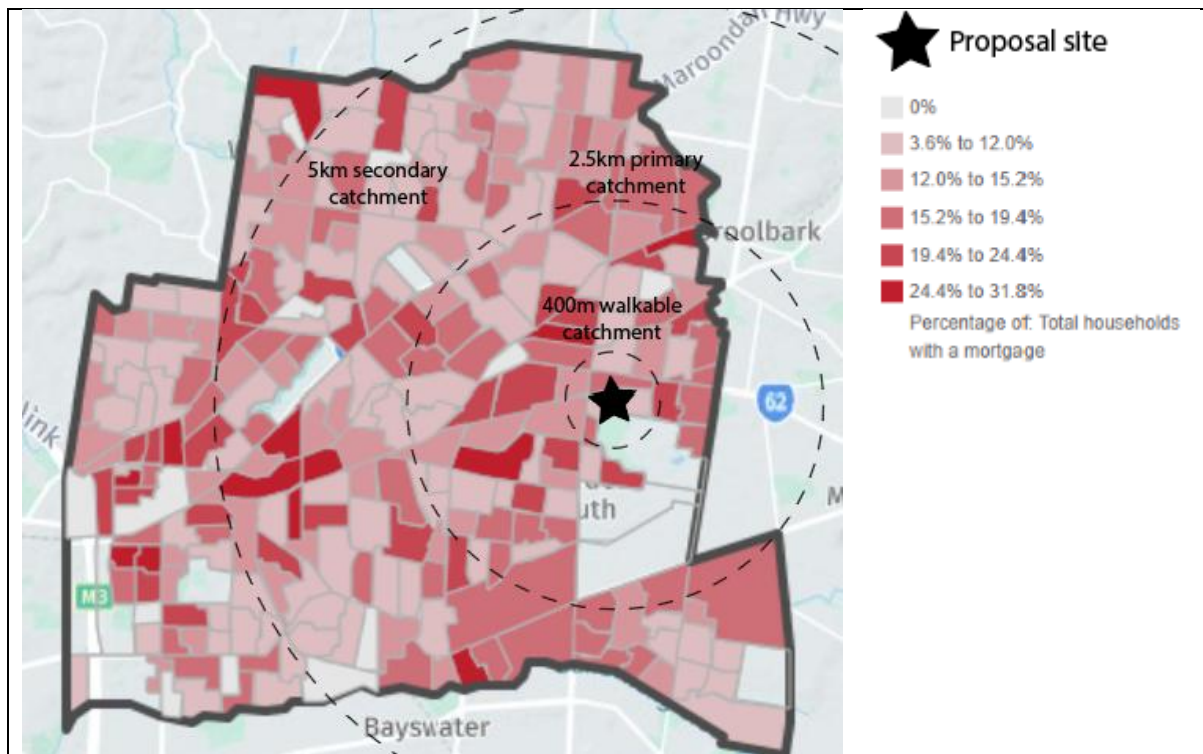
47. The community in the proposal site's 400m walkable, primary and secondary catchments displays mixed levels of socio-economic disadvantage. The community directly to the north and south of the proposal site has higher levels of socio-economic disadvantage relative to the community to the west of the proposal site (refer to Figure 15).
48. There are concentrations of housing stress within the proposal site's primary catchment, particularly to the north-west, west and south-west of the proposal site (refer to Figure 16).
49. There is a concentration of people renting social housing within the proposal site's primary 2.5 kilometre catchment (refer to Figure 17).

Figure 15 - Socio-economic disadvantage in the proposal site's primary and secondary catchments



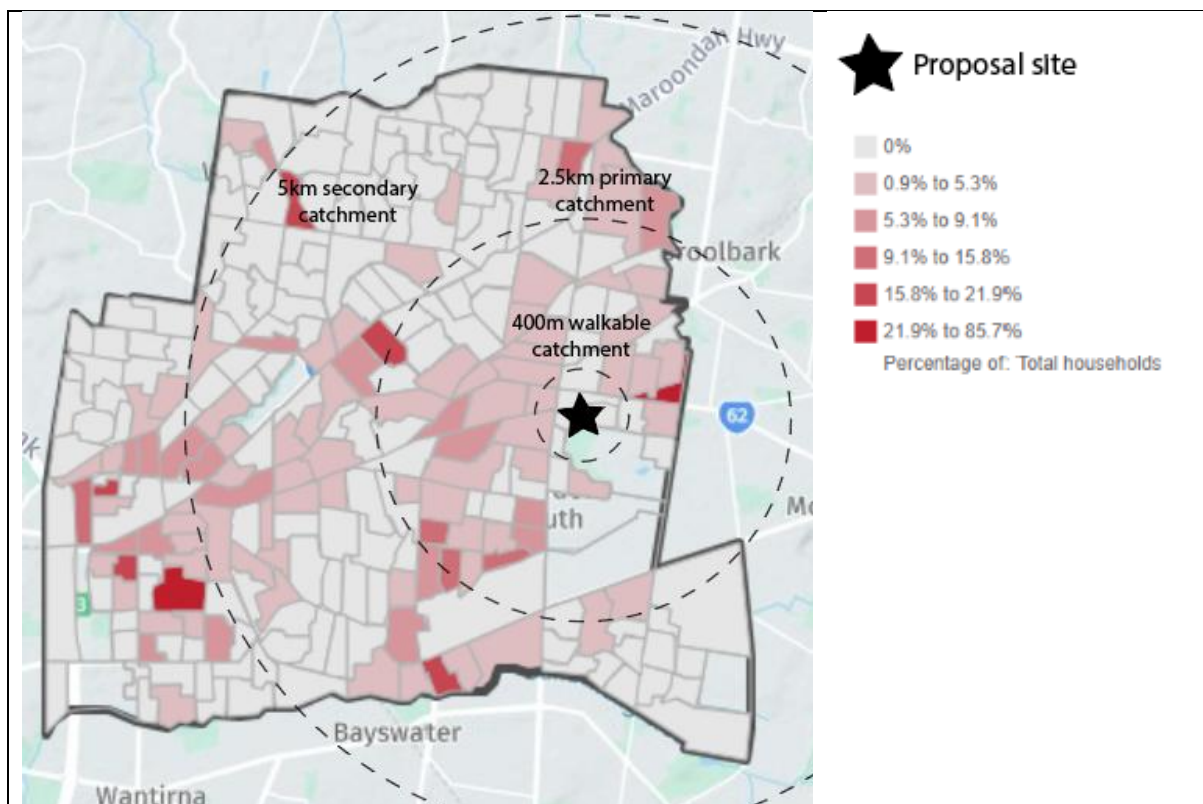
Source: SymPlan and ABS Census of Population and Housing, 2021

Figure 16 – Housing stress, 2021



Source: SymPlan and ABS Census of Population and Housing, compiled by .id consulting

Figure 17 – Social housing, 2021



Source: SymPlan and ABS Census of Population and Housing, compiled by .id consulting

50. Table 2 illustrates the number of people and the proportion of the population receiving selected welfare payments⁴ in the proposal site's primary catchment. This Table indicates the following:

- In 2025 half the SA2 areas had a higher percentage of their population receiving selected welfare payments than the City of Maroondah.
- In 2025 the Croydon-East SA2, in which the proposal site is located, had a higher percent of its population receiving selected welfare payments compared to the City of Maroondah (4.7 per cent and 3.8 per cent respectively).
- In 2025 the SA2 areas representing the highest proportion of the gaming room's patrons i.e. Croydon, Mooroolbark, Boronia, Ringwood, Bayswater and Kilsyth (20 per cent, 9 per cent, 7 per cent, 6 per cent, 6 per cent and 6 per cent respectively) have a higher proportion of their population receiving selected welfare payments compared to the City of Maroondah.
- Between 2024 and 2025 the Croydon-East SA2, in which the proposal site is located, experienced a significantly higher increase in total selected welfare payments and a higher increase in the percentage of the total population receiving welfare payments compared to Maroondah.

Table 2 – Selected welfare payments in SA2 areas in proposal site's primary catchment, June 2025

Statistical Area 2	Population 2021	Total selected welfare payments		% population receiving selected welfare payments		Total selected welfare payments	% population receiving selected welfare payments
		2024	2025	2024	2025	per cent change 2024-25	
Bayswater North	11,871	465	500	3.9	4.2	7.5	4.2
Boronia	23,560	960	1120	4.1	4.8	16.7	4.8
Chirnside Park	11,779	355	405	3.0	3.4	14.1	3.4
Croydon	10,993	285	300	2.6	2.7	5.3	2.7
Croydon - East	16,109	680	760	4.2	4.7	11.8	4.7
Croydon - West	14,139	450	505	3.2	3.6	12.2	3.6
Croydon Hills - Warranwood	18,053	485	505	2.7	2.8	4.1	2.8
Croydon South	4,898	185	180	3.8	3.7	-2.7	3.7
Ferntree Gully - North	14,145	605	605	4.3	4.3	0.0	4.3
Ferntree Gully (South) - Upper Ferntree Gully	15,334	550	595	3.6	3.9	8.2	3.9
Kilsyth	9,916	340	400	3.4	4.0	17.6	4.0
Lilydale - Coldstream	19,599	685	730	3.5	3.7	6.6	3.7
Mooroolbark	23,146	775	915	3.3	4.0	18.1	4.0
Ringwood	18,715	840	915	4.5	4.9	8.9	4.9
Ringwood East	21,132	665	715	3.1	3.4	7.5	3.4
Ringwood North	9,654	250	265	2.6	2.7	6.0	2.7
Maroondah	115,043	4035	4365	3.5	3.8	8.2	3.8

Higher than the City of Maroondah

Source: Department of Social Services

⁴ JobSeeker and Low Income Cards

4.3 Gaming

4.3.1 EGMs and gaming venues

51. There are currently eight gaming venues and 640 attached EGM entitlements in the City of Maroondah.
52. Three of the venues are hotels and five are clubs.
53. The City of Maroondah is subject to a regional cap of 759 EGMs. Regional caps are imposed on municipalities considered to be at an elevated risk of gambling related harms due to three factors namely high EGM density, high levels of socio-economic disadvantage and high EGM player loss. They are a maximum rather than a benchmark. The total number of EGMs in the City of Maroondah is 119 below the regional cap.

4.3.2 Key municipal gaming indicators

54. In the 2024-25 Financial Year, relative to metropolitan municipalities, the City of Maroondah had: (refer to Table 3)
- A slightly lower unemployment rate.
 - A lower total player loss and player loss per EGM.
 - A significantly higher density of EGMs per 1,000 adults.
 - Higher EGM player loss per adult.
 - Fewer adults per venue/more venues per adult.

Table 3 – Key gaming indicators, City of Maroondah and metropolitan municipalities (2024-25)

Indicator	Maroondah	Metro (average)
Player loss	\$64,200,755.53	\$80,666,289.72
Player loss per EGM	\$100,313.68	\$130,774.85
Player loss per venue	\$8,025,094	\$8,093,608
Adults per Venue	11,778	15,705
EGMs per 1,000 adults	6.8	4.5
Player loss per adult	\$681	\$559
Unemployment rate	3.7%	4%

	Less risky relative to metropolitan municipalities
	More risky relative to metropolitan municipalities
	Similar to metropolitan municipalities

Source: VGCC

4.3.3 Gaming venue player loss

2024-25 Financial Year

55. Based on the following player loss trends for the 2024-25 Financial Year it is clear that EGMs are being used more intensely at the Dorset Gardens Hotel and the City of Maroondah's hotels compared to hotels in metropolitan municipalities and Victoria (refer to Table 4 and Figure 18)

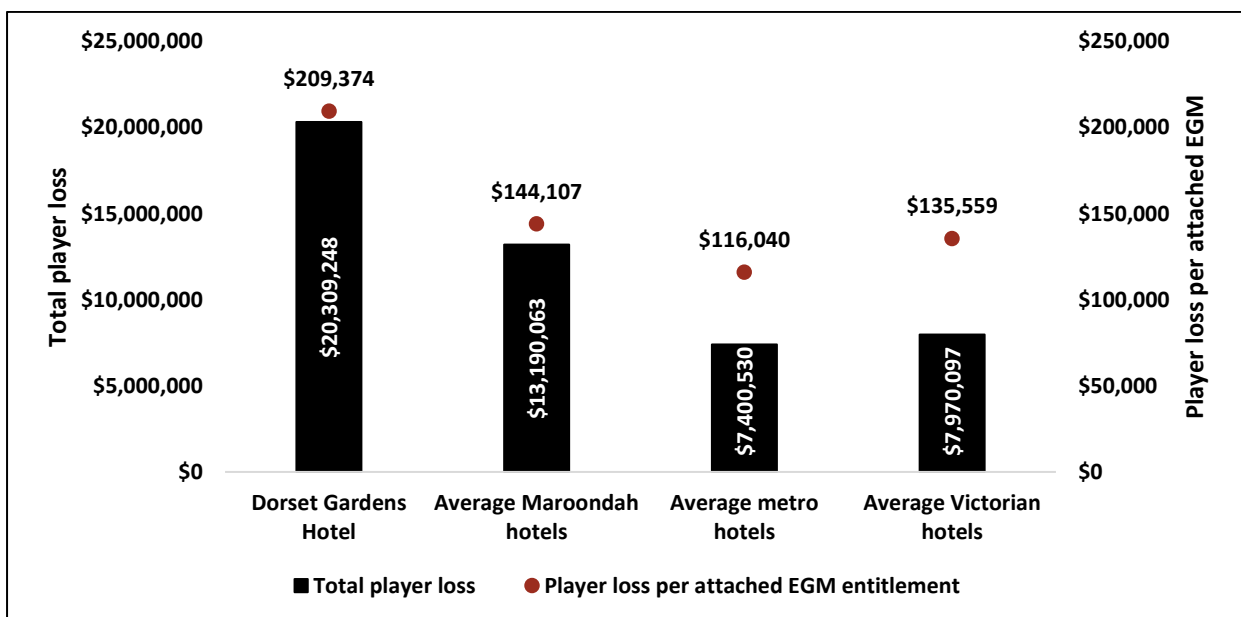
- The Dorset Gardens Hotel had the highest total player loss and player loss per attached EGM in the municipality (refer to Table 4).
- Total player loss and player loss per attached EGM entitlement in the City of Maroondah's hotels were higher than the average for metropolitan and Victorian hotels (refer to Figure 18).
- Total player loss at the Dorset Gardens Hotel was significantly higher than the average for hotels in the City of Maroondah, metropolitan hotels and Victorian hotels (refer to Figure 18).

Table 4 – Venue player loss and player loss per attached EGM entitlement, City of Maroondah, 2024-25

Venue and benchmark	Venue type	Total player loss	EGMs	Player loss per attached EGM entitlement
Club Kilsyth	Club	\$8,094,976	105	\$77,095.01
Club Ringwood	Club	\$5,103,606	82	\$62,239
Eastwood Golf Club	Club	\$147,172	19	\$7,745.92
Ringwood RSL	Club	\$5,019,476	70	\$71,706.80
The Coach and Horses	Club	\$6,265,335	90	\$69,614.83
Croydon Hotel	Hotel	\$10,209,886	105	\$97,237.01
Dorset Gardens Hotel	Hotel	\$20,309,248	97	\$209,373.69
Manhattan Hotel	Hotel	\$9,051,055	72	\$125,709.10
City of Maroondah		\$64,200,756	640	\$720,721

Source: VGCCC

Figure 18 - Total player loss and player loss per attached EGM entitlement 2024-25



Source: VGCCC

Change between 2018-19 and 2024-25

56. Between the 2018-19 and 2024-25 Financial Years the Dorset Gardens Hotel (refer to Table 5):

- Had the highest absolute increase in total player loss and player loss per EGM of all the municipality's venues.
- Accounted for nearly half of the total increase in the City of Maroondah's player loss (45 per cent).

57. The two venues closest to the proposal site i.e. Croydon Hotel and Kilsyth Club experienced a reduction in both total player loss and player loss per EGM in this time period (refer to Table 5).

Table 5 - Change in total player loss per EGM (absolute and percent) 2018-19 to 2024-25

2024-25			Change 2018-19 to 2024-25			
Venue name	Player loss per venue	Player loss per EGM	Abs. change in total player loss	Abs. change in player loss per EGM	% total M'dah player loss	% change in total player layer loss
<i>Club Kilsyth (club)</i>	\$8,094,976	\$77,095	-\$459,236	-\$4,374	-5.8	-5.4
Club Ringwood (club)	\$5,103,606	\$62,239	\$799,311	\$9,748	10.1	18.6
Eastwood Golf Club (club)	\$147,172	\$7,746	-\$40,066	-\$2,109	-0.5	-21.4
Ringwood RSL (club)	\$5,019,476	\$71,707	\$1,130,223	\$16,146	14.3	29.1
The Coach and Horses (club)	\$6,265,335	\$69,615	\$2,234,689	\$24,830	28.4	55.4
<i>Croydon Hotel (hotel)</i>	\$10,209,886	\$97,237	-\$430,601	-\$4,101	-5.5	-4.0
Dorset Gardens Hotel (hotel)	\$20,309,248	\$209,374	\$3,544,131	\$36,537	45.0	21.1
Manhattan Hotel (hotel)	\$9,051,056	\$125,709	\$1,097,808	\$15,247	13.9	13.8
City of Maroondah	\$64,200,766	\$100,314	\$7,876,258	\$12,307	100.0	14.0

Source: VGCCC

58. Data for December 2019 and December 2021 reflect gaming behaviours just before and after the closure and opening of gaming venues as a result of the COVID-19 Pandemic (refer to Tables 6 and 7). These data indicate the following in relation to differences in gaming behaviours in December 2019 compared with December 2021:

- The City of Maroondah experienced an increase in EGM player loss while adjoining municipalities experienced a reduction in EGM player loss. This is despite a reduction in the number of EGMs in this period.
- The City of Maroondah experienced an increase in EGM player loss and player loss per EGM despite a reduction in EGMs. This did not occur in the adjoining municipalities.
- A reduction in EGMs in metropolitan municipalities and Victoria also resulted in an increase in EGM player loss and player loss per EGM. However, the increase in player loss per EGM in the City of Maroondah (24.9 per cent) was almost three times that of the metropolitan municipalities (8.7 per cent) (refer to Table 7).

Table 6 – EGM player loss and player loss per EGM, City of Maroondah, adjoining municipalities, metropolitan Melbourne and Victoria, December 2019 and December 2021

LGA and benchmark	Dec-19			Dec-21		
	EGMs	Player loss	Player loss per EGM	EGMs	Player loss	Player loss per EGM
Maroondah	759	\$5,317,287	\$7,006	640	\$5,599,606	\$8,749
Whitehorse	431	\$4,476,886	\$10,387	430	\$4,347,242	\$10,110
Manningham	522	\$5,016,660	\$9,610	519	\$4,369,766	\$8,420
Yarra Ranges	436	\$2,411,795	\$5,532	444	\$2,362,749	\$5,322
Average Metro	628	\$6,089,872	\$9,697	622	\$6,556,990	\$10,545
Victoria	26,472	\$234,380,123	\$8,854	26,209	\$235,941,319	\$9,002

Source: VGCCC

Table 7 – Change in player loss per EGM, City of Maroondah, adjoining municipalities, metropolitan Melbourne and Victoria, December 2019 to December 2021

LGA and benchmark	Change EGM player loss	Change number EGMs	% change in player loss	% change player loss per EGM
Maroondah	\$282,320	-119	5.3	24.9
Whitehorse	-\$129,644	-1	-2.9	-2.7
Manningham	-\$646,895	-3	-12.9	-12.4
Yarra Ranges	-\$49,046	8	-2.0	-3.8
Average Metro	\$467,118	-6.2	7.7	8.7
Victoria	\$1,561,196	-263	0.7	1.7

Source: VGCCC

59. This analysis suggests that, unlike adjoining municipalities and metropolitan municipalities, the closure and reopening of gaming venues in the City of Maroondah resulted in an unusual intensity of gaming in the short term which has continued in the medium term.

4.4 Strategic

4.4.1 Plans, policies and strategies

60. Gambling is one of the social harms identified in the Maroondah Liveability Wellbeing and Resilience Strategy 2021-2031 and Maroondah Health and Wellbeing Action Plan 2023-2025.
61. The Maroondah Liveability Wellbeing and Resilience Strategy 2021-2031 acknowledges that gambling harm is a contributing factor to poor mental and physical health, including physical and family violence.

4.4.2 Clause 52.28 Gaming Maroondah Planning Scheme

62. The purpose of Clause 52.28 Gaming is to ensure that gaming machines are situated in appropriate locations and premises.
63. The objectives in the schedule to Clause 52.28 Gaming are:
- To discourage increases in the ratio of gaming machines per adult, number of venues or gaming losses per adult in the municipality.
 - To ensure that gaming premises minimise the harmful effects of problem gambling.

- To ensure that applications deliver a net community benefit.
- To encourage gaming premises to offer a range of non-gaming entertainment and recreation activities rather than be stand-alone gaming premises.
- To avoid concentration of gaming premises and ensure the operation, location and design of gaming premises does not have a negative impact on the amenity, character, community values and safety of the area.

4.4.3 Maroondah City Council Gambling Policy 2018 (currently under review)

64. The Maroondah City Council Gambling Policy 2018 articulates Council's approach and commitment to preventing and minimising gambling-related harm in the community, particularly those most at risk of gambling-related harm.
65. The Policy also informs Council's response to applications for new gaming venues or increases in the number of EGMs in existing venues. As such, it informs any potential submissions to the VGCCC in relation to these applications.
66. One of the policy objectives in the Maroondah Gambling Policy 2018 is to "demonstrate Council's commitment to protecting those most at risk of gambling-related harms through its various statutory roles and responsibilities".
67. The three priorities underpinning the policy are founded on two principles:
 - A range of social, economic and environmental factors affect a person's mental and physical health and wellbeing.
 - Improved health outcomes result from the implementation of an appropriate mix of actions.

5 Social and Economic Impact Assessment

68. This section discusses the potential social and economic impacts of the proposal. It draws on the analysis presented in Section 4 and the evidence provided in Appendix 3 – Theoretical Framework.

5.1 Framework

69. The social and economic impact assessment in this section presented in Tables 12 and 13 is informed by the following:

- The theoretical framework provided in Appendix 3.
- Specific features of the venue and proposal outlined in Sections 2 and 3.
- The context within which the proposal site operates presented in Section 4.
- The potential for the proposal to cause or exacerbate existing and potential vulnerability to gambling-related harm in Section 5.2.
- The extent to which protective and risk factors outlined in Section 5.3 would cause or exacerbate existing and potential vulnerability to gambling-related harm.

70. The weighting of social and economic impacts in Tables 12 and 13 is illustrated in Table 8. It has been adapted from the methodology guiding an Environmental Effects Statement.⁵ It is also informed by my professional judgement and experience in the preparation of social and economic impact assessments for gaming proposals.

Table 8 – Weighting of social and economic impacts

Consequence or significance scale	Social and economic impact
Neutral	No impact will result.
Negligible	Impact results in little or no social or economic harm or benefit. Protective factors offset risk factors.
Low	Social or economic impact affects a small number of people AND/OR individuals and community not vulnerable to gambling-related harm. Risk factors mostly offset by protective factors.
Moderate	Social or economic impact affects a moderate number of people AND/OR individuals and community have a mixed level of vulnerability to gambling-related harm. Risk factors partially offset by protective factors.
Significant	Social or economic impact affects a large number of people AND/OR individuals and community on balance have a high level of vulnerability to gambling-related harm. Risk factors are not offset by protective factors.

⁵ <https://www.planning.vic.gov.au/environmental-assessments/environmental-assessment-guides/use-of-risk-and-impact-assessment-in-an-ees>

5.2 Vulnerability to gambling-related harm in the City of Maroondah

71. This section describes the extent to which the municipality and the community in the venue's catchments are vulnerable to gambling-related harm.
72. Where relevant, the discussion draws on key aspects of the project context presented in Section 4.

5.2.1 Socio-economic indicators of gambling-related harm

73. Table 9 summarises the socio-economic indicators of vulnerability to gambling-related harms in the community in the proposal site's primary catchment (refer to Appendix 3).
74. Relative to the City of Maroondah the communities in Ringwood East and Croydon display higher levels of vulnerability to gambling-related harms. These two communities represent more than a quarter (26 percent) of patrons in the Dorset Garden's gaming room.

Table 9 – Socio-economic vulnerability to gambling-related harm in proposal site's primary catchment and patron profile (2.5 km)

	Males	18-24 years	Unemployment rate	Personal income less than \$20,799	Households with mortgage stress	Households with rental stress	Below Year 11 schooling	People with no qualifications	Group households	People speaking Chinese languages at home	People not fluent in English	Aboriginal and Torres Strait Islander	Speaking a language other than English	People with a long-term health condition	People with a mental health condition
Bayswater North	48.4	7.1	3.9	22.6	15.2	33.8	24.7	36.5	2.4	5.2	3.2	0.7	19.7	36.1	12
Croydon	47.1	7.1	4.3	22.6	14.8	35.1	25.5	36.4	2.7	4.8	4	0.6	18.9	36	10.3
Croydon South	48.2	6.7	3.4	23.3	14.6	28.9	24.3	36.6	1.9	4.4	2.4	0.9	15.0	34.4	10
Kilsyth	46.7	6.9	2.7	20.4	18.3	30.7	28.1	36.4	2.3	0.7	2	0.9	12.6	35.5	10.9
Kilsyth South	50.3	12.8	3.5	24.9	9.1	39.6	26.1	42.1	0.9	1.4	0.9	0.6	8.0	35	10.4
Ringwood East	48.6	7.8	4.8	23	14.9	33.9	20.6	33.2	3.2	8.5	5.3	0.8	23.9	34	10.7
Mooroolbark *	49.6	8.4	4.0	23.6	13.4	32.2	27.3	38.4	2.1	2.6	3.2	0.9	15.3	34.5	10.3
Boronia **	48.7	7.3	4.3	25.7	16.3	33.1	25.0	36.6	3.6	6.6	3.3	0.9	20.8	36.4	11.0
City of Maroondah	48.4	7.8	4	23.3	13.8	33.6	22.2	34.8	2.5	6.6	3.8	0.6	19.8	34.2	9.8
Eastern Metropolitan Region	48.8	9.2	4.7	26.1	18.1	31.6	19.1	33.1	3.5	14.4	5.4	0.5	32.7	31	7.8

* Located in Yarra Ranges Shire

** Located in the City of Knox, within 5km secondary catchment

Less favourable relative to the City of Maroondah	
Less favourable relative to Eastern Metropolitan Region	

Source: ABS Census of Population and Housing, sourced by .id consulting

5.2.2 Health and wellbeing indicators of gambling-related harm

75. The City of Maroondah is experiencing compromised crime and safety compared to the adjoining municipalities. The rate of criminal and family incidents per 100,000 people has increased over the past five years.
76. A high proportion of people in the proposal site's primary catchment are financially vulnerable demonstrated by concentrations of housing stress, reliance on welfare payments and social housing.

5.2.3 Gambling indicators

77. The entire municipality is subject to a regional cap on the number of EGMs due to its vulnerability to gambling-related harm.
78. The municipality has a higher density of EGMs per adult, EGM player loss per adult and more venues per adult compared to metropolitan municipalities.
79. EGMs are being used more intensely in the Dorset Gardens Hotel and the City of Maroondah's hotels compared to hotels in metropolitan municipalities and Victoria. The growth in EGM player loss (total and per attached EGM) in the previous seven years, even immediately following the Covid-19 Pandemic, indicates EGMs have historically been used more intensely at the venue compared to other venues in the municipality and the venue's catchment.

5.2.4 Indicative prevalence of gambling-related harm

80. The indicative prevalence of gambling-related harm in the City of Maroondah extrapolated in Table 10 is based on the research findings in Appendix 3. The data in this table are indicative only and provide a high level, theoretical perspective on the potential level of gambling-related harm in the municipality. They do not factor in municipality-specific data such as the relative vulnerability of the community to gambling-related harm or gambling indicators specific to the municipality such as EGM density and EGM player loss (total, per EGM and per venue) relative to metropolitan municipalities, adjoining municipalities or Victoria.

Table 10 – Indicative indicators of gambling-related harm in the City of Maroondah

Assumption	Overall impact	Indicative City of Maroondah impact
Adults who gamble in Victoria ⁶	69%	55,119
Adults who gamble on EGM's in Victoria ⁷	14.1%	13,173
Low risk gamblers ⁸	6.7%	3,693
Moderate risk gamblers ⁹	2.4%	2,242
'Problem gamblers' ¹⁰	0.7%	654
Total gamblers experiencing harm	9.8%	6,589
Lower level of people indirectly affected by a person experiencing harm ¹¹	5	32,945
Upper level of people indirectly affected by a person experiencing harm ¹²	10	65,891
Combined EGM player loss of moderate risk and problem gamblers (likely range for moderate risk and problem gamblers together is 42 per cent to 75 per cent with an average of 58.5 per cent) ¹³ - high	58.5%	\$471,924
Combined EGM player loss of moderate risk and problem gamblers (likely range for moderate risk and problem gamblers together is 42 per cent to 75 per cent with an average of 58.5 per cent) ¹⁴ - low	58.5%	\$348,814

Source: SymPlan extrapolations based on evidence in Appendix 3

⁶ Victorian Population Gambling and Health Study 2018-2019, Fact Sheet 2.

⁷ Victorian Population Gambling and Health Study 2018-2019, Fact Sheet 2.

⁸ Rockloff, M, Browne, M, Hing, N, Thorne, H, Russell, A, Greer, N, Tran, K, Brook, K & Sproston, K 2020, *Victorian population gambling and health study 2018–2019*, Victorian Responsible Gambling Foundation, Melbourne.

⁹ Rockloff, M, Browne, M, Hing, N, Thorne, H, Russell, A, Greer, N, Tran, K, Brook, K & Sproston, K 2020, *Victorian population gambling and health study 2018–2019*, Victorian Responsible Gambling Foundation, Melbourne.

¹⁰ Rockloff, M, Browne, M, Hing, N, Thorne, H, Russell, A, Greer, N, Tran, K, Brook, K & Sproston, K 2020, *Victorian population gambling and health study 2018–2019*, Victorian Responsible Gambling Foundation, Melbourne.

¹¹ Victorian Responsible Gambling Foundation (2013) *The Responsible Gambling Guide*

¹² Victorian Responsible Gambling Foundation (2013) *The Responsible Gambling Guide*

¹³ Productivity Commission 2010

¹⁴ Productivity Commission 2010

5.3 Protective and risk factors

81. The proposal is associated with the following protective and risk factors which influence the extent to which it will cause or exacerbate gambling-related harm in the community (refer to Table 11).

Table 11 – Protective and risk factors

Protective factor	Risk factor
Municipal gaming indicators	
The City of Maroondah had a lower player loss per EGM compared with metropolitan municipalities in the 2024-25 Financial Year.	<p>The following municipal gaming indicators increase the potential for the proposal to cause or exacerbate gambling-related harm:</p> <ul style="list-style-type: none"> • The municipality is covered by a regional cap on the number of EGMs. • Despite a reduction of 139 EGMs since December 2019 there has been an increase in player loss and player loss per attached EGM entitlement in the municipality. • The City of Maroondah had a relatively high density of EGMs per 1,000 adults, EGM player loss per adult and low number of adults per venue compared to metropolitan municipalities in the 2023-24 Financial Year.
Venue player loss	
Not applicable	<p>The following factors suggest the venue's EGMs have historically been used very intensely. Intense utilisation of EGMs is associated with elevated player loss which is an indicator of gambling harm.</p> <ul style="list-style-type: none"> • The usage analysis on page 18 of the Urbis SEIS notes the long and high utilisation rate of the EGMs. • In the 2024-25 Financial Year, the Dorset Gardens Hotel had the highest total player loss and player loss per attached EGM of all the venues in the municipality. • In the past seven years, the Dorset Gardens has seen a significant increase in total player loss and player loss per attached EGM entitlement.
Proposal features	
<p>The following features of the proposal reduce the potential impact of increased exposure to gambling in the community:</p> <ul style="list-style-type: none"> • The proposal involves a 'top up' as opposed to a new gaming venue. • The proposal does not enlarge the proportion of the venue allocated to gambling activities. 	<p>The projected player loss resulting from the additional eight EGMs increase the risk of gambling-related harm for the following reasons:</p> <ul style="list-style-type: none"> • The proposal involves an increase in EGM player loss at the venue and in the community. • More than half (60 per cent) of the projected additional player loss associated with the proposal will be new player loss.

Protective factor	Risk factor
Socio-economic and health profile	
<p>The socio-economic profile of the City of Maroondah as a whole reduces the risk of gambling-related harm for the following reasons:</p> <ul style="list-style-type: none"> • The municipality as a whole has mixed levels of socio-economic disadvantage. • The City of Maroondah displays few socio-economic indicators of vulnerability to gambling-related harms relative to the Eastern Metropolitan Region. 	<p>The socio-economic profile in the proposal site's primary (2.5 kilometre) and secondary (5 kilometre) catchments increases the risk of gambling-related harm for the following reasons:</p> <ul style="list-style-type: none"> • There are concentrations of socio-economic disadvantage in the proposal site's primary (2.5 kilometre) and secondary (5 kilometre) catchments. • The proposal site's primary catchment (2.5 kilometre) displays multiple socio-economic indicators of vulnerability to gambling-related harms relative to the City of Maroondah. • The suburbs of Ringwood and Croydon which account for 41 per cent of the gaming room's patrons, display the greatest numbers of indicators of vulnerability to gambling-related harms relative to the City of Maroondah. • Compared to Victoria, the City of Maroondah has a compromised health and safety status.
Physical location	
<p>The proposal site is not within 400m of facilities associated with day-to-day activities including public transport, shopping complex, strip shopping centre. This reduces the potential risk of convenience gambling which is a determinant of gambling-related harm.</p>	<p>The land use mix in the area surrounding the proposal site increases the risk of gambling-related harm for the following reasons:</p> <ul style="list-style-type: none"> • There are no non-gambling social, leisure, entertainment and recreation facilities and activities that operate at the same time as the gaming room in the surrounding area. • The proximity of the Swinburne University of TAFE Croydon campus exposes tradespeople and newly arrived refugees to gambling who are recognised as being at a higher risk of gambling-harm.
Venue type and size	
<p>The venue provides some non-gambling entertainment activities which provide gambling patrons with non-gambling social, leisure and entertainment activities.</p>	<p>The following venue features increase the risk of gambling-related harm:</p> <ul style="list-style-type: none"> • Dorset Gardens is a hotel. The Commission and Tribunal have in the past considered some hotel venues riskier than some clubs. • The proposal would result in a very large venue and would operate at the maximum number of EGMs permissible in Victoria. • The Onyx Gaming Compliance Report indicates the venue's risk assessment rates the venue as 'medium-high' (Section 3.3). It is unclear what criteria were used in the risk assessment.

Protective factor	Risk factor
Venue operations	
<p>The following aspects of the venue's operations reduce the risk of gambling-related harm:</p> <ul style="list-style-type: none"> • The reception operates during gaming room operating hours. This increases opportunities for interaction with and surveillance of gaming patrons. • The venue's loyalty program does not allow for points accrued from the use of the EGMs reducing the incentive to use EGMs. • The Onyx Gaming Compliance Report found that the proposed operator is committed to a best practice approach to responsible gambling, harm minimisation and customer care. • The Responsible Service of Gambling Code of Conduct prohibits staff from using EGMs at the venue. This reduces the opportunity for staff to use EGMs. 	<p>The following aspects of the venue's operations increase the risk of gambling-related harm:</p> <ul style="list-style-type: none"> • The proposal does not align with the Productivity Commission's recommended shut down period of a minimum of six hours or recommended closing time of 2am. Research indicates people experiencing gambling-related harm are likely to use EGMs after 2am. • The Responsible Service of Gambling Code of Conduct does not prohibit the serving of food and beverages to patrons at the EGMs. This reduces opportunities for breaks in play.
Venue design	
<p>The following design features of the venue reduce exposure to gambling activities:</p> <ul style="list-style-type: none"> • The dedicated outdoor smoking area off the gaming room may encourage breaks of play. • The bistro is functionally and physically separated from the gaming room. 	<p>The following design features of the venue increase exposure to gambling activities:</p> <ul style="list-style-type: none"> • There are four entrances to the gaming room. This increases accessibility and therefore exposure to gambling. • There is an entrance to the gaming room off the rear car park increasing exposure to gambling among people, including those affected by harm who will not need to pass reception to leave or enter the gaming room. This reduces the opportunity for reception staff to interact with people affected by gambling harm. • Non-gambling patrons entering the venue from the rear entrance pass through gambling activities to access the non-gambling activities. • The entrance to the gaming room off the reception has a partial screen permitting the escape of sights and sounds from the gaming room into parts of the venue not associated with gambling. • The two doors to the gaming room off the sports bar are transparent and were wedged open during the site inspection. Both factors

Protective factor	Risk factor
	<p>result in visual and audible exposure to gambling.</p> <ul style="list-style-type: none"> • There are multiple direct lines of sight from other facilities into the gaming room. • There is poor surveillance of some of the EGMs from the cashier's desk. • None of the entrances to the gaming room require patrons to pass through non-gambling activities. • The gaming room operates when non-gambling facilities are closed. • The location of the bathrooms off the gambling area does not encourage breaks of play.

5.4 Potential social impacts

Table 12 – Potential social impacts

Social impact consideration and discussion	Potential impact	Weighting
Community contribution		
<p>In principle, community contributions have the potential to support social vitality and social cohesion in the community served by the recipient organisations.</p> <p>The Urbis SEIS (page 11) indicates the value of the average annual community contribution over the past five years has been \$31,700 annually. It also indicates local charities, sports clubs and other groups have been recipients of these community contributions.</p> <p>There is a lack of transparency in the application documentation in relation to the following:</p> <ul style="list-style-type: none"> • Which community organisations are currently receiving, or would be the recipients, of the cash and in-kind contributions. Given the proximity of the venue to adjoining municipalities, it is possible these 'local' organisations may be outside the City of Maroondah. • The nature of the in-kind contributions. • Specific or direct support from organisations currently receiving, or potentially receiving, the cash and in-kind community contributions. Some organisations and agencies do not accept funds generated from gambling activities. • The governance arrangements supporting the distribution of these contributions. <p>It is therefore not possible to determine the social benefit derived to the community in the City of Maroondah.</p>	Unable to assess	
<p>The Urbis SEIS (page 41) indicates the proposal would involve "enshrine(ing) future community contributions of \$20,000 per annum cash, and a further \$10,000 in-kind".</p> <p>This would amount to a total of \$30,000 in community contributions which is less than the average value of the community contributions made by the venue over the past five years (\$31,700).</p>	Negative	Negligible

Social impact consideration and discussion	Potential impact	Weighting
<p>Condition 6 – Community Benefit in Annexure 5 of the Urbis SEIS states that the venue operator will <u>maintain</u> [my underlining] annual contributions with a total value of \$30,000 for as long as any of the additional EGMs are in operation at the premises. This condition also indicates the community contributions would be allocated to maintaining the existing courtesy bus which may also be used by any organisation or club, including those potentially not located in the City of Maroondah.</p> <p>This indicates that proposed community contribution arrangements would:</p> <ol style="list-style-type: none">1. Only result in a condition securing the level of community contributions which have been made over the past five years rather than an increase in community contributions as a result of the additional eight EGMs2. Potentially support organisations not located within the City of Maroondah. As a result, the proposal would not result in an increase in either cash or in-kind contributions and may continue to support organisations located in other municipalities.3. Result in a potential reduction in the value of the community contributions made over the past five years.		
Increased access to and quality of non-gambling social, leisure, entertainment and recreation facilities		
<p>The proposal would result in an additional café.</p> <p>The other works relate solely to refurbishments.</p> <p>The Urbis SEIS (p41) states “While these works may proceed in time, without the additional profitability generated by the extra EGMs, the investment will be delayed”.</p> <p>The plans in the Urbis SEIS indicate there will not be an increase in the number of existing accessible car parks.</p> <p>My site inspection confirmed the availability of the accessible car parks identified on the existing venue layout plans and proposed venue layout plans.</p> <p>The proposal would result in a very insignificant increase in access to and quality of non-gambling social, leisure, entertainment and recreation facilities. However, given proposed works are likely to go ahead despite the outcome of the application, these changes are immaterial to the outcome of the application.</p>	Neutral	
Access to EGMs for people not directly or indirectly affected by gambling-related harm		

Social impact consideration and discussion	Potential impact	Weighting
<p>The social benefit of increased access to EGMs for those not affected by gambling-related harm is limited by the following factors:</p> <ul style="list-style-type: none"> • The increase in EGMs at the proposal site will enhance access to opportunities to use EGMs, both at the venue and in the municipality. • There are currently 8 gaming venues in the City of Maroondah, one of which is located within the proposal site's primary catchment and additional four of which are located within the proposal site's secondary catchment. 	Positive	Negligible
Access to EGMs for those directly or indirectly affected by gambling-related harms		
<p>The proposal has the potential to cause and exacerbate gambling-related harm due to the following risk factors (refer to Sections 5.2 and 5.3 for greater details):</p> <ul style="list-style-type: none"> • The proposal involves an increase in the number of EGMs and an increase in player loss at the venue, 60 per cent of which will be new player loss. Increased access to opportunities to use EGMs and increased EGM player loss are recognised by the Commission as determinants of gambling-related harm. • The City of Maroondah displays several indicators of vulnerability to gambling-related harm including: <ul style="list-style-type: none"> ○ Compromised health and safety, including elevated rates of criminal and family violence. ○ High density of EGMs per 1,000 adults, player loss per adult and density of gaming venues per adult. • The location and socio-economic profile of the proposal site's catchment area display the following risk factors <ul style="list-style-type: none"> ○ There is limited access to engage in non-gambling activities in the surrounding area. ○ The site is in close proximity to trade students. ○ The community displays multiple socio-economic indicators of vulnerability to gambling-related harm. • The venue and proposal site display the following risk factors: <ul style="list-style-type: none"> ○ The existing EGMs at the venue have historically and are currently being used very intensely. 	Negative	Moderate

Social impact consideration and discussion	Potential impact	Weighting
<ul style="list-style-type: none"> The venue's design and layout, and location of entrances increase exposure to gambling activities for both gambling and non-gambling patrons. The venue's operating hours do not align with best practice. <p>These risk factors are unlikely to be mitigated by the locational and operational protective factors associated with the proposal site and venue features.</p>		

5.5 Potential economic impacts

Table 13 – Potential economic impacts

Economic impact consideration and discussion	Potential impact	Weighting
Community contributions		
<p>In principle, community contributions have the potential to support the financial viability of the recipient organisations.</p> <p>There is uncertainty as to whether the recipient organisations are located in the City of Maroondah.</p> <p>There is no information indicating the cash contributions will be allocated to welfare and support agencies addressing gambling-related harm in the community.</p> <p>There is no indication that potential recipient organisations would be willing to accept funds generated by gambling.</p>	Unable to assess	
<p>The proposal does not involve an increase in the value of the community contributions over and above those that have been provided in the past five years.</p> <p>It appears the proposal will result in a net reduction in the value of the community contributions currently being provided by the venue.</p>	Negative	Negligible
Capital investment		
	Positive	Negligible

Economic impact consideration and discussion	Potential impact	Weighting
<p>The capital expenditure of \$6.7 million is associated with works over two stages.</p> <p>There is no indication in the application documentation that the capital investment will be of benefit to the City of Maroondah’s economy.</p> <p>The value of the capital expenditure is marginal in the context of the City of Maroondah’s economy.</p>		
Employment generation		
<p>There is no information regarding the number of potential temporary jobs created during construction.</p> <p>The proposal will result in a small increase in long term employment opportunities.</p> <p>There is no information regarding the proponent’s strategy to fill the additional jobs by residents of the City of Maroondah.</p>	Positive	Negligible
Economic stimulus		
<p>No information is provided on the value or source of supply contracts or complementary expenditure (internal and external).</p>	Unable to assess	
Competition		
<p>Enhanced competitiveness is one of the objectives of the <i>Gambling Regulation Act 2003</i>.</p> <p>The increased revenue associated with the additional EGMs would result in improved competitiveness for the proponent. This is an economic benefit.</p> <p>The proposal has the potential to enhance the competitiveness of the four other venues in the catchment. This is an economic benefit.</p> <p>Any changes to competitiveness would be distributed between the four gaming venues in the proposal site’s primary and secondary catchments.</p> <p>However, the proposal has the potential to divert gaming and complementary expenditure from the four other venues in the catchment. This is an economic disbenefit, particularly for the two clubs which operate as not-for-profit businesses. This factor offsets any potential economic benefit associated with increased competitiveness</p>	Neutral	

Economic impact consideration and discussion		Potential impact	Weighting
The potential competitiveness resulting from the proposed improvements to the venue’s facilities is uncertain given these improvements would be undertaken irrespective of the outcome of the proposal.		Unable to assess	
Tourism			
Promotion of tourism is one of the objectives of the <i>Gambling Regulation Act 2003</i> . The proposal does not involve the provision of any tourist or cultural activities.		Neutral	
Player loss from those not directly or indirectly affected by gambling-related harm			
Consumer surplus in the gambling context refers to the entertainment value derived from expected losses. Some of the additional gaming patrons may experience a consumer surplus and therefore derive a financial benefit from the use of the additional EGMs. Consumer surplus associated with additional player loss associated with people not directly affected by gambling-related harm is an economic benefit.		Positive	Negligible
Player loss from those directly and indirectly affected by gambling-related harm			
The Expenditure Report on page 19 states: “Noting the concentration and performance of gaming competitors, it would still be reasonable to conclude that there will be an identifiable component of the venue's gaming expenditure represented as new expenditure which will be derived from gaming patrons who do not currently conduct gaming activities at other venues (in part or in full)”. The community in the proposal site’s primary catchment is considered at an elevated risk of gambling-related harm. The extent of player loss at the venue is indicative of gambling-related harm among its patrons. Any increase in player loss is associated with gambling harm. The proposal has the potential to increase the demand for health, welfare and support services in the City of Maroondah. This is associated with a potential cost to be borne by service providers. The economic impact of the additional costs borne by services providers addressing gambling-related harm would be negative.		Negative	Moderate

5.6 Alignment with Council policy (statutory plans, gambling policy)

5.6.1 Plans, policies and strategies

82. Given the multiple risk factors associated with the proposal, it does not align with the principle underlying Council's plans, policies and strategies to promote a safe environment for gambling activities. The proposal therefore compromises the health and wellbeing of the community.

5.6.2 Maroondah Gambling Policy 2018

83. The extent to which the proposal aligns with the provisions in the Maroondah Gambling Policy 2018 is described in Table 14.

Table 14 – Alignment with Maroondah Gambling Policy 2018

Council activity	Discussion	Alignment
Priority 1 Partnerships		
Objective: To work in partnership with relevant agencies and stakeholders to protect those at risk of gambling-related harms		
<i>1.2 Endorse efforts of organisations that increase access to non-gambling social, leisure, recreational and entertainment activities in the municipality.</i>	<p>The revenue derived from the additional EGMs is not required to support the inclusion of the café.</p> <p>The proposal does not diversify the range of non-gambling social, leisure, entertainment and recreational activities in the municipality.</p>	Does not align.
<i>1.3 Identify opportunities to increase non-gambling social, leisure, entertainment and recreation opportunities in facilities that incorporate EGMs.</i>	<p>The revenue derived from the additional EGMs is not required to support the inclusion of the café.</p> <p>The proposal does not diversify the range of non-gambling social, leisure, entertainment and recreational activities in the municipality.</p>	Does not align.
<i>1.4 Identify opportunities for the gambling industry to increase access to welfare and support services that are directed at addressing gambling-related harms in the community.</i>	The proposal does not involve any initiatives that increase access to welfare and support services directed at addressing gambling-related harms in the community.	Does not align.
<i>1.5 Discourage gambling proposals that do not result in benefits to the community.</i>	The potential for the proposal to result in minimal social and economic benefits to the community is questionable.	Does not align.
Priority 3 Planning, regulation and enforcement		
Objective: To effectively manage gambling in the municipality through relevant provisions in the statutory, strategic and regulatory framework		
<i>3.2 Discourage an increase in EGM density per 1,000 adults and EGM expenditure in communities and local neighbourhoods at an elevated risk of gambling-related harms.</i>	While the community in the proposal site's primary catchment displays mixed levels of socio-economic disadvantage relative to the City of Maroondah and the Eastern Metropolitan Region, the community in the proposal site's primary and secondary	Does not align.

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Council activity	Discussion	Alignment
	catchments display multiple indicators of vulnerability to gambling-related harms. This is particularly evident in the suburbs of Ringwood, Croydon and Boronia which represent a significant proportion of the proposal site's patrons.	

84. The proposal does not align with the principles and actions in the Maroondah Gambling Policy 2018.

6 Summary, conclusion and recommendations

6.1 Summary

6.1.1 Impact on community wellbeing

85. The proposal is associated with the following protective factors:

- The physical location of the proposal site limits the potential for convenience gambling.
- The location of the bistro, function areas and bingo facility in relation to the gaming room physically and functionally separates gambling and non-gambling facilities.
- Certain aspects of the venue's operations reduce the risk of gambling-harm.

86. The proposal is associated with multiple risk factors for gambling-related harms and compromised community wellbeing. These risk factors are associated with the following:

- The venue is a large hotel which would become even larger.
- Vulnerability of the community in the City of Maroondah to gambling-related harms is reflected in the key indicators and imposition of a regional cap on EGMs across the entire municipality.
- Player loss and player loss per EGM at the Dorset Gardens Hotel is significantly higher compared to the other venues in the City of Maroondah, and hotels in metropolitan municipalities and Victoria.
- The concentration of socio-economic vulnerability to gambling-related harm of the community in the proposal site's primary catchment increases the potential for the proposal to compromise the health and wellbeing of the community.
- The venue's trading hours do not align with the Productivity Commission's recommendations.
- The location and design of the gaming room have the potential to increase exposure to gambling activities and minimise the opportunity for staff to monitor people affected by gambling harm.

87. The only social or economic benefits associated with the proposal are increased access to EGMs for those not affected by gambling-harm and the inclusion of a small cafe.

88. Due to the multiple socio-economic and venue-related risk factors, the proposal has the potential to result in gambling-harm within a community already considered to be vulnerable to gambling-related harm.

89. Overall, the proposal has the potential to increase gambling-related harms and compromise the wellbeing of the community in the primary catchment of the proposal site and the community in the City of Maroondah.

6.1.2 Alignment with City of Maroondah plans, strategies and policies

90. The proposal does not align with the provisions in Council's plans, strategies and policies, particularly those in the Maroondah Gambling Policy 2018.

6.2 Conclusion

91. In conclusion:

- The proposal has the potential to increase gambling-related harms and compromise the wellbeing of the community in the primary catchment of the proposal site and the community in the City of Maroondah.
- The proposal is associated with multiple risk factors which outweigh the potential for the protective factors to adequately mitigate against the potential increase in gambling-related harms.
- The proposal is associated with minimal benefits.

6.3 Recommended mitigation measures

92. Should the Commission be of mind to approve the proposal to increase the number of EGMs by eight from 97 to 105 at the proposal site, it is recommended the following mitigation measures be included by way of condition of approval:

6.3.1 Venue design

1. Redesign the gaming area such that there is only one entrance to the gaming area by:
 - a. Removing the two entrances to the gaming area off the sports bar.
 - b. Closing the rear entrance to the gaming area off the car park.
 - c. Fitting the remaining single entrance to the gaming area with a floor to ceiling self-closing door constructed from wood or opaque glass.
 - d. Installing a screen behind the self-closing door at the remaining single entrance to reduce sights and sounds into the gaming room when the door is open.
2. Design the layout of EGMs in the gaming room to ensure direct lines of sight from the cashier's desk to each EGM.
3. Install self-closing doors between the cashier's desk/bar to ensure the gaming area is not visible from the bistro.

6.3.2 Venue operations

4. Reduce the operating hours in order that the gaming room closes at 2am.
5. Provide food and beverages at all times in the bistro while the gaming room is operating.
6. Prohibit the serving of food and beverages to patrons while seated at an EGM.

6.3.3 Community contributions

7. Retain existing level of cash and in-kind community contributions to a value of at least \$30,000 per annum for the lifetime of the entitlements.
8. Increase the value of the proposed cash community contributions per additional EGM in line with industry practices.
9. Ensure the proposed cash contributions are allocated in consultation with key stakeholders and service providers. These cash contributions should be allocated in accordance with the priorities identified in the *Maroondah Liveability, Wellbeing and Resilience Strategy 2021-2031*.

10. Ensure the governance arrangements associated with the allocation of the proposed cash community contributions and the nature of the in-kind contributions are transparent and equitable.

Appendix 1– Bibliography

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Appendix 2 – Social impact assessment framework

Social impacts

Social impacts have been defined as ‘the consequences to human populations of any public or private actions that alter the ways in which people live, work, play, relate to one another, organise to meet their needs and generally cope as members of society. The term also includes cultural impacts involving changes to the norms, values and beliefs that guide and rationalize their cognition of themselves and their society’.¹⁵

In the context of applications for EGMs and gaming venues, social impacts include changes to the following:¹⁶

- *People’s way of life* – how they live, work, play and interact with one another on a day to day basis.
- *Their culture* – their shared beliefs, customs and values in relation to gambling and EGMs.
- *Their community* – its cohesion, stability, character, services and facilities.
- *Their health and wellbeing* – the impact of gambling-related harm on mental and physical health and wellbeing; health has been defined as a state of complete physical, mental, social and spiritual wellbeing and not merely the absence of disease or infirmity.¹⁷
- *Their personal and property rights* – particularly whether people are economically affected, or experience personal disadvantage.
- *Their fears and aspirations* – their perceptions about their safety, their fears about the future of their community, and their aspirations for their future and the future of their children.

Social impact assessment

Social impact assessment has been defined as follows:¹⁸

The processes of analysing, monitoring and managing the intended and unintended social consequences, both positive and negative, of planned interventions (policies, programs, plans, projects) and any social change processes invoked by those interventions. Its primary purpose is to bring about a more sustainable and equitable biophysical and human environment.

The core international values of impact assessment include:¹⁹

- People have a right to live and work in an environment which is conducive to good health and to a good quality of life and which enables the development of human and social potential.
- Social dimensions of the environment are important aspects of people’s health and quality of life.
- People have a right to be involved in decision-making about the planned interventions that will affect their lives.

¹⁵ The Interorganizational committee on Principles and Guidelines for Social Impact Assessment (2003) *US Principles and guidelines*. “Principles and guidelines for social impact assessment in the USA” *Impact Assessment and Project Appraisal*, Volume 21, Number 3, September 2003, p231Beech Tree Publishing, Surrey, UK

¹⁶ Planning Institute of Australia *Social Impact Assessment Policy Position Statement 2006*, International Association for Impact Assessment (2003) *Social Impact Assessment*. International Principles Special Publication Series No.

¹⁷ World Health Organisation

¹⁸ IAIA (2003) *Social Impact Assessment International Principles* Special Publication Series No. 2

¹⁹ Vanclay, F. (2003) ‘International Principles for Social Impact Assessment’ *Impact Assessment and Project Appraisal Vol. 21*, number 1, March 2003, pp 5-11, Beech Tree Publishing, UK

- Mitigation measures can be implemented to minimise the harm and maximise the benefits from a specific planned intervention or related activity.

The following international guiding principles underpinning social impact assessment are relevant:²⁰

- The diversity of stakeholder interests needs to be recognised and valued.
- In order to protect the environment, a concept which includes people's ways of life and the integrity of their communities, the precautionary approach should be applied. Where there are threats or potential threats of serious social impact, lack of full certainty about those threats should not be used as a reason for approving the planned intervention or not requiring the implementation of mitigation measures and stringent monitoring.
- The benefits from a range of planned interventions should address the needs of all, and the social impacts should not fall disproportionately on certain groups of the population.
- It is generally preferable and cheaper in the long run to prevent negative social impacts from happening than having to rectify damage after the event.
- The discussion of the proposal includes a description of any policy or plan that is relevant.²¹

An important feature of social impact assessment is that social, economic and biophysical impacts are inherently and inextricably interconnected. Social impact assessment must therefore develop an understanding of the impact pathways created when change in one domain triggers impacts across other domains and the iterative or flow-on consequences within each domain.²²

The Planning Institute of Australia's *Social Impact Assessments Policy Position Statement 2006* recommends the application of social impact assessment as a tool to support better development outcomes. This Statement also:

- highlights the critical contribution social impact assessment makes to sound decision-making processes and the achievement of equitable and sustainable development
- affirms the need to include consideration of community concerns and the participation of stakeholders in the process
- affirms the need for a description of the local cultural context
- recommends mitigation measures

²⁰ Vanclay, F. (2003) 'International Principles for Social Impact Assessment' *Impact Assessment and Project Appraisal* Vol. 21, number 1, March 2003, pp 5-11, Beech Tree Publishing, UK

²¹ The Interorganizational committee on Principles and Guidelines for Social Impact Assessment (2003) *US Principles and guidelines. "Principles and guidelines for social impact assessment in the USA"* *Impact Assessment and Project Appraisal*, Volume 21, Number 3, September 2003, p231Beech Tree Publishing, Surrey, UK p234

²² International Association for Impact Assessment (2003) *Social Impact Assessment. International Principles* Special Publication Series No.

Appendix 3 - Theoretical framework

Gambling-related harm

Definition

Problem gambling has been defined as:

*Difficulties in limiting money and/or time spent on gambling, which leads to adverse consequences for the gambler, others, or for the community.*²³

Gambling-related harm has been defined as:

*Any initial or exacerbated adverse consequence due to an engagement with gambling that leads to a decrement to the health or wellbeing of an individual, family unit, community or population.*²⁴

Prevalence of gambling-related harm

A study in Victoria found that 9.6 per cent of gamblers experience harms, with a further 1.8 per cent experiencing extra severe harms. The prevalence of one or more harms and one or more extra severe harm among gamblers in the Eastern Metro Region is 9.5 per cent and 1.6 per cent respectively.²⁵

Recent research found:

Aggregate harms accruing to ‘non-problem’ gamblers exceed those occurring to ‘problem gamblers’ by approximately 6-1.²⁶

50 per cent, 34 per cent and 15 per cent of total harm resulting from gambling in Victoria can be divided among low-risk, moderate risk and ‘problem gamblers’, respectively.²⁷

Research indicates about 10 per cent of people experiencing harm from gambling seek help.²⁸

Indicators of vulnerability to gambling-related harms

Socio-economic	<ul style="list-style-type: none">• low educational attainment^{29 30}• people on low- to middle annual personal incomes of between \$20,800 and \$41,599³¹• relative socio-economic disadvantage³²• unemployment^{33; 34}
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²³ Victorian Auditor-General’s Report (2010) 11:2 p3

²⁴ Browne, M, Langham, E, Rawat, V, Greer, N, Li, E, Rose, J, Rockloff, M, Donaldson, P, Thorne, H, Goodwin, B, Bryden, G & Best, T 2016, Assessing gambling-related harm in Victoria: a public health perspective, Victorian Responsible Gambling Foundation, Melbourne.

²⁵ Rockloff, M, Browne, M, Hing, N, Thorne, H, Russell, A, Greer, N, Tran, K, Brook, K & Sproston, K 2020, *Victorian population gambling and health study 2018–2019*, Victorian Responsible Gambling Foundation, Melbourne.

²⁶ Browne, M, Langham, E, Rawat, V, Greer, N, Li, E, Rose, J, Rockloff, M, Donaldson, P, Thorne, H, Goodwin, B, Bryden, G & Best, T 2016, Assessing gambling-related harm in Victoria: a public health perspective, Victorian Responsible Gambling Foundation, Melbourne.

²⁷ Browne, M, Langham, E, Rawat, V, Greer, N, Li, E, Rose, J, Rockloff, M, Donaldson, P, Thorne, H, Goodwin, B, Bryden, G & Best, T 2016, Assessing gambling-related harm in Victoria: a public health perspective, Victorian Responsible Gambling Foundation, Melbourne.

²⁸ Miller, H (2014) *Discussion Paper Seeking Help for Gambling Problems* Victorian Responsible Gambling Foundation

²⁹ Department of Justice (2009) Problem gambling from a public health perspective, Profile of Problem Gambling Risk Segments

³⁰ Wilkins, R (2017) *The Household, Income and Labour Dynamics in Australia Survey: Selected Findings from Waves 1 to 15*

³¹ Rockloff, M, Browne, M, Hing, N, Thorne, H, Russell, A, Greer, N, Tran, K, Brook, K & Sproston, K 2020, *Victorian population gambling and health study 2018–2019*, Victorian Responsible Gambling Foundation, Melbourne

³² Relative disadvantage, as measured by the SEIFA index of Relative Socio-economic disadvantage is an indicator used by the Commission and Tribunal to assess probable impacts of problem gambling and the Minister for Gaming in identifying communities to be covered by a regional cap on EGMs.

³³ Department of Justice (2009) Problem gambling from a public health perspective Factsheet 4, Profile of Problem Gambling Risk Segments

³⁴ Wilkins, R (2017) *The Household, Income and Labour Dynamics in Australia Survey: Selected Findings from Waves 1 to 15*

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	<ul style="list-style-type: none"> residents of social housing³⁵
Socio-demographic	<ul style="list-style-type: none"> males³⁶ aged 18-24 years followed by 45-54 years, 35-44 years and 25-34 years³⁷ not speaking English at home³⁸ or non-Caucasians³⁹ Aboriginal and Torres Strait Islanders⁴⁰ migrants and people from CALD communities, particularly Asian groups including Vietnamese, Chinese and Korean⁴¹ experiencing low social capital⁴² (using volunteering rate as a proxy)
Health and wellbeing status	<ul style="list-style-type: none"> experiencing psychological distress or compromised mental health and wellbeing^{43;44} smoke^{45, 46, 47, 48} consume alcohol and become intoxicated while gambling;^{49; 50, 51} people seeking treatment for substance abuse disorders⁵².
Life experiences	<ul style="list-style-type: none"> Taking on a mortgage, loan or making a repayment⁵³; people with higher number of negative life experiences affecting themselves and their families e.g. divorce, legal difficulties and financial issues;⁵⁴

³⁵ VCGLR decision on the proposed increase of EGMS at the Braybrook Hotel, September 2013.

³⁶ Rockloff, M, Browne, M, Hing, N, Thorne, H, Russell, A, Greer, N, Tran, K, Brook, K & Sproston, K 2020, *Victorian population gambling and health study 2018–2019*, Victorian Responsible Gambling Foundation, Melbourne

³⁷ Rockloff, M, Browne, M, Hing, N, Thorne, H, Russell, A, Greer, N, Tran, K, Brook, K & Sproston, K 2020, *Victorian population gambling and health study 2018–2019*, Victorian Responsible Gambling Foundation, Melbourne

³⁸ Hing, N., Russell, A., Tolchard, B., & Nower, L. (2015, online). 'Risk factors for gambling problems: An analysis by gender.' *Journal of Gambling Studies*.

³⁹ Cookman, M. L., Weatherly, J. N. (2015), 'Investigating Possible Effects of Ethnicity and Age on Gambling as an Escape,' *Journal of Gambling Studies*, online 2 June 2015.

⁴⁰ Rockloff, M, Browne, M, Hing, N, Thorne, H, Russell, A, Greer, N, Tran, K, Brook, K & Sproston, K 2020, *Victorian population gambling and health study 2018–2019*, Victorian Responsible Gambling Foundation, Melbourne

⁴¹ *Problem gambling in CALD communities, the evidence base for working with CALD communities* (2011)

⁴² Department of Justice (undated) *A guide to using a health promotion approach to problem gambling* State Government of Victoria

⁴³ de Castella, A et al (2011) Problem Gambling in People Presenting to A Public Mental Health Service Office of Gaming and Racing, Department of Justice

⁴⁴ Department of Justice (undated) *A guide to using a health promotion approach to problem gambling*

⁴⁵ Rockloff, M, Browne, M, Hing, N, Thorne, H, Russell, A, Greer, N, Tran, K, Brook, K & Sproston, K 2020, *Victorian population gambling and health study 2018–2019*, Victorian Responsible Gambling Foundation, Melbourne

⁴⁶ VAGO (2010) *Taking Action on Problem Gambling*

⁴⁷ <http://www.tobaccoinaustralia.org.au/15-4-overview-of-key-public-areas-and-environments>

⁴⁸ Wilkins, R (2017) *The Household, Income and Labour Dynamics in Australia Survey: Selected Findings from Waves 1 to 15*

⁴⁹ Rockloff, M, Browne, M, Hing, N, Thorne, H, Russell, A, Greer, N, Tran, K, Brook, K & Sproston, K 2020, *Victorian population gambling and health study 2018–2019*, Victorian Responsible Gambling Foundation, Melbourne

⁵⁰ Leino, T. et al (2017) 'Gambling behavior in alcohol-serving and non-alcohol-serving-venues: a study of electronic gaming machine players using account records' *Addiction Research & Theory* 25:3, 201-297
https://www.academia.edu/32303619/Leino_T._Sagoe_D._Griffiths_M.D._Mentzoni_R.A._Pallesen_S._and_Molde_H._2017_.Gambling_behavior_in_alcohol-serving_and_non-alcohol-serving_venues_A_study_of_electronic_gaming_machine_players_using_account_records_Addiction_Research_and_Theory_25_201-207

⁵¹ Wilkins, R (2017) *The Household, Income and Labour Dynamics in Australia Survey: Selected Findings from Waves 1 to 15*

⁵² Dowling, NA, Cowlishaw, S, Jackson, AC, Merkouris, SS, Francis, KL & Christensen, DR (2015), 'Prevalence of psychiatric co-morbidity in treatment-seeking problem gamblers', *Australian & New Zealand Journal of Psychiatry*, online 3 March 2015.

⁵³ State Government of Victoria (2008) p189

⁵⁴ VAGO (2010) *Taking Action on Problem Gambling*

	<ul style="list-style-type: none"> people experiencing trauma, social isolation, boredom⁵⁵ and loneliness⁵⁶, particularly among older people⁵⁷ and women⁵⁸
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While women aged 55+ are less likely individually to develop clinically significant gambling problems, they contribute substantially to the ‘burden of harm’ experienced by Victorians.⁵⁹

International research has found that older people are also at an elevated risk of gambling-related harms.⁶⁰ Although this research is not supported by the Victorian research⁶¹, it aligns with the findings of other research that people experiencing trauma, social isolation, boredom⁶² and loneliness⁶³, particularly among older people⁶⁴ and women⁶⁵ are at risk of gambling-related harms.

Social and economic impacts of EGM gambling

Table 14 summarises the social and economic impacts (benefits and disbenefits) associated the use of EGMs.

Table 15 - Summary of social and economic impacts of EGM gambling

Social	Economic
Benefits ⁶⁶	
Access to entertainment for those not affected by harm	Cash and in-kind community contribution (additional source of revenue for recipients)
Cash and in-kind community contribution (social capital)	Employment (temporary and permanent)
Increased access to social, leisure, entertainment and recreation facilities	Source of revenue for operators
Improved quality of social, leisure, entertainment and recreation facilities	Economic stimulus (investment, supply contracts and complementary expenditure)
	Competition (improved competition)
	Tourism
	EGM player loss for people not affected by gambling-related harms
Disbenefits ⁶⁷	
Impact on people directly and indirectly affected by gambling-related harm such as relationship breakdown, mental and physical	Competition (transfer of revenue from other gaming venues, food and beverages)
	Cost of service provision

⁵⁵ State Government of Victoria (2008) p15

⁵⁶ Miller, H. (2015) *Background Paper. Risk Factors for Problem Gambling: Environmental, geographic, social, cultural, demographic, socio-economic, family and household*. Victorian Responsible Gambling Foundation

⁵⁷ Botterill, E, Gill, PR, McLaren, S & Gomez, R (2015), ‘Marital Status and Problem Gambling Among Australian Older Adults: The Mediating Role of Loneliness’, *Journal of Gambling Studies*, Online first, 8 October 2015

⁵⁸ Hing, N., Russell, A., Tolchard, B., & Nower, L. (2015) online. Risk factors for gambling problems: An analysis by gender. *Journal of Gambling Studies*.

⁵⁹ Browne, M, Langham, E, Rawat, V, Greer, N, Li, E, Rose, J, Rockloff, M, Donaldson, P, Thorne, H, Goodwin, B, Bryden, G & Best, T 2016, Assessing gambling-related harm in Victoria: a public health perspective, Victorian Responsible Gambling Foundation, Melbourne.

⁶⁰ Lemay, A; Bakich, E and Fontaine, A (2006) *Betting on Older Adults. A Problem Gambling Prevention Clinical Manual for Service Providers* Sault Area Hospital, St Joseph’s Care Group, Centretown Community Health Centre

⁶¹ State Government of Victoria (2009) *Problem gambling from a public health perspective* Factsheet 4, Profile of Problem Gambling Risk Segments Department of Justice

⁶² State Government of Victoria (2008) p15

⁶³ Miller, H. (2015) *Background Paper. Risk Factors for Problem Gambling: Environmental, geographic, social, cultural, demographic, socio-economic, family and household*. Victorian Responsible Gambling Foundation

⁶⁴ Botterill, E, Gill, PR, McLaren, S & Gomez, R (2015), ‘Marital Status and Problem Gambling Among Australian Older Adults: The Mediating Role of Loneliness’, *Journal of Gambling Studies*, Online first, 8 October 2015

⁶⁵ Hing, N., Russell, A., Tolchard, B., & Nower, L. (2015) online. Risk factors for gambling problems: An analysis by gender. *Journal of Gambling Studies*.

⁶⁶ Adapted from Productivity Commission (2010) and VCGLR application forms

⁶⁷ Adapted from VCEC Inquiry into Costs of Problem Gambling (2012), VCGLR forms and independent research

illness, crime, family violence, loss of employment	Financial hardship Unemployment
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Social impact considerations

Community contribution

Applications for additional EGMs are often associated with cash and in-kind community contributions.

Cash community contributions typically involve a fund allocated annually to community organisations. Cash contributions support programs and activities delivered by these organisations. In-kind community contributions involve free and ready access to community organisations to non-gambling facilities such as meeting and function rooms, discounted food and beverages, vouchers and. Cash and in-kind community contributions are likely to have a positive social impact on the participating community organisations and beneficiaries of discounted food and beverages, facility hire and vouchers.

The extent of the social impact of cash and in-kind community contributions schemes is influenced by the following factors:

In some instances community organisations and Councils are unwilling to participate in community contributions schemes associated with the operation of gaming venues.

The clubs and community organisations that will be the recipients of these community contributions may not necessarily be used by people experiencing gambling-related harms who tend to be socially isolated. The community organisations supported by the increased contributions are therefore unlikely to satisfy the social needs of people who are isolated and therefore at risk of gambling-related harms.

The Victorian Competition and Efficiency Commission Inquiry into the costs of problem gambling (December 2012, p 1) found the costs of gambling-related harms are borne not by individual organisations and beneficiaries of community contributions but by the health and human services sectors within the broader community.

The Gaming Commission has found the benefits associated with community contributions are contingent on their outcomes rather than their magnitude.^{68, 69}

Access to social, leisure, entertainment and recreation facilities

EGMs provide a legal and legitimate form of entertainment in Victoria.

Gaming venues typically provide non-gambling facilities such as meeting and function rooms, bistros, cafes, lounges, smoking areas, sports and recreation facilities. Gambling activities typically include gaming rooms and sports lounges.

Proposals that increase the range and diversity of non-gambling facilities are associated with social benefits.

Health and wellbeing impacts of EGM player loss

EGM player loss not associated with gambling-related harm is a social benefit.

EGM player loss is one of the determinants of gambling-related harms. The Productivity Commission (2010 p5.1) noted the substantial difficulties in calculating gambling player loss. However they estimated that 'problem gamblers'⁷⁰ account for between 22 per cent and 60 per cent (averaged at

⁶⁸ Commission Decision Berwick Springs Hotel 2017

⁶⁹ Commission Decision, Lynbrook Hotel, 2018

⁷⁰ As defined by the Problem Gambling Severity Index (PGSI)

41 per cent) of total EGM spending and the likely range for moderate risk and problem gamblers together is 42 to 75 per cent (average 58.5 per cent) of total EGM spending.⁷¹ Other research estimates 36 per cent of player loss on EGM gambling is sourced from people classified as ‘problem gamblers’ with a further 23.6 per cent coming from people classified as ‘moderate risk gamblers’.⁷² This suggests the combined spend of moderate risk and ‘problem gamblers’ is 59.6 per cent of EGM player loss.

The Commission has noted that wherever accessibility to EGMs is increased, there is always a risk of an increase in gambling-related harms which can lead to other costs such as lost productivity, increased health and social service requirements and other social costs.⁷³ This is because EGMs are recognised as posing the greatest risks to existing and potential problem gamblers⁷⁴ for the following reasons:

Around 80 per cent of presentations to counselling agencies relate to problems associated with EGMs.⁷⁵

For each additional EGM introduced into an area, there will be an increase of between 0.6 and 1 ‘problem gamblers’, with an average of 0.8 problem gamblers per EGM.⁷⁶

The Commission recognises the association between EGM player loss and family violence.⁷⁷ Gambling problems are clearly and strongly linked to being a perpetrator, victim or survivor of domestic and family violence.^{78, 79} Other research has found that each person with gambling problems has 5 to 10 people in their lives who are affected by their gambling.⁸⁰

Economic impact considerations

Community contribution

Cash and in-kind community contributions may supplement the income of the beneficiaries and support their financial viability.

These contributions may therefore result in economic benefits.

Employment generation

Proposals may be associated with an increase in temporary jobs during construction and permanent jobs during operation. They may also be associated with an increase in permanent jobs, both directly and indirectly associated with the operation of EGMs in the venue. This is an economic benefit.

The economic benefit associated with employment to be generated by a proposal is influenced by the following factors:

The Productivity Commission found the employment and economic benefits of gambling are less than they might appear to be.⁸¹

⁷¹ Productivity Commission (2010)

⁷² Browne, M, Greer, N, Armstrong, T, Doran, C, Kinchin, I, Langham, E & Rockloff, M 2017, *The social cost of gambling to Victoria*, Victorian Responsible Gambling Foundation, Melbourne.

⁷³ Commission Decision, Croydon Hotel, paragraph 90; Commission Decision, Dromana Hotel, paragraph 59, Commission Decision, Mornington on Tanti, paragraph 94, Commission Decision, Zagame’s Berwick, paragraph 53

⁷⁴ Australian Government Productivity Commission (2010) *Productivity Community Inquiry Report, Gambling* p5.22

⁷⁵ Australian Government Productivity Commission (2010) *Productivity Community Inquiry Report, Gambling* p5.26

⁷⁶ Storer, J, Abbot, M and Stubbs, J (2009) ‘Access or adaptation? A meta-analysis of surveys of problem gambling prevalence in Australian and New Zealand with respect to concentration of electronic gaming machines’ *International Gambling Studies* Volume. 9, No. 3, December 2009, p238

⁷⁷ Commission decision, Altona RSL, 2018

⁷⁸ Hing, N., O’Mullan, C., Nuske, E., Breen, H., Mainey, L., Taylor, A., ... Rawat, V. (2020). *The relationship between gambling and intimate partner violence against women* (Research report, 21/2020).

⁷⁹ Rockloff, M, Browne, M, Hing, N, Thorne, H, Russell, A, Greer, N, Tran, K, Brook, K & Sproston, K (2020), *Victorian population gambling and health study 2018–2019*, Victorian Responsible Gambling Foundation, Melbourne.

⁸⁰ Victorian Responsible Gambling Foundation (2013) *The Responsible Gambling Guide*

⁸¹ Gretton, P. (2013) *On input-output tables: uses and abuses*, Staff Research Note, Productivity Commission, Canberra.

The Commission has found the transfer of EGM player loss from elsewhere in the municipality may also be associated with a transfer of employment.⁸² As a result, the stated additional jobs at the proposal site may not necessarily be associated with a net increase of jobs in the municipality.

The extent to which the additional jobs will be filled by members of the community in the municipality,⁸³ including those experiencing unemployment.

Economic stimulus

Economic stimulus can result from supply contracts and internal and external complementary expenditure.

The economic flow on effects associated with supply contracts, and internal and external complementary expenditure associated with goods and services is an economic benefit if they occur within the municipality.⁸⁴

The Tribunal found that the economic benefits of gaming player loss by non-problem gamblers are of less benefit to the community than other forms of discretionary expenditure and that expenditure multipliers applicable to player loss on EGMs are among the lowest of all industry sectors, in terms of flow on benefits to the regional economy. The Tribunal also accepted that player loss on EGMs is less of an economic benefit compared to expenditure on meals in a pub, restaurant or café.⁸⁵

EGM gambling inputs into the economy as a whole are largely, but not wholly, cancelled out by the multiplied negative effects on other areas of consumption.⁸⁶

Investment

Proposals for new gaming venues and top ups are typically associated with capital expenditures and investment. This is an economic benefit.

Competition

Enhanced competitiveness is one of the objectives of the *Gambling Regulation Act 2003*.

This increased competitiveness may encourage gaming operators in the primary and secondary catchments to enhance the quality of offer in other gaming venues. This is an economic benefit.

It also may compromise the financial viability of competing gaming venues as a result of the transfer of EGM and non-gambling expenditure. This is an economic disbenefit.

Tourism

Promotion of tourism is one of the objectives of the *Gambling Regulation Act 2003*.

Tourism and related cultural activities may assist in creating economic growth, if aligned with gambling activities. There is a need to capitalise on synergies of clubs, tourism, cultural experiences and retail to improve, rather than diminish, local trade.⁸⁷

⁸² Commission Decision Berwick Springs Hotel 2017

⁸³ Commission Decision Berwick Springs Hotel 2017

⁸⁴ Commission Decision Berwick Springs Hotel 2017, Commission Decision Robin Hood Hotel 2021, ALH Group Property Holdings Pty Ltd v Whittlesea CC [2017] VCAT 2164 [at 101]

⁸⁵ ALH Group Property Holdings Pty Ltd v Whittlesea CC [2017] VCAT 2164 at 86 and 87

⁸⁶ Department of Justice (2011) *Socio-economic impacts of access to electronic gaming machines in Victoria* State Government of Victoria p40

⁸⁷ State Government of Victoria (2011) *Socio-economic impacts of access to electronic gaming machines in Victoria – Effects on demand and communities* Department of Justice

There is a substitution effect between gambling and other forms of entertainment which may include tourism.⁸⁸

Gaming venues operating out of hotels and clubs in suburban locations are less likely to stimulate tourism compared with other gambling venues such as large casinos.

EGM player loss

Gaming venues are associated with EGM player loss by people both not affected by gambling related harms, and those directly and indirectly associated with gambling-related harms. This was noted by the Gaming Commission in its decision on 4 December 2023 (paragraph 86).

The economic benefits associated with winnings from EGM use accrue to the gambler. EGM player loss not directly associated with gambling-related harm is considered an economic benefit.⁸⁹

Economic costs of gambling-related harms include direct costs to state and local government; indirect costs associated with job change, unemployment, bankruptcy, relationship breakdown; costs to the justice system due to criminal incidents; costs to business; and costs of expenditure to the gambler and others.⁹⁰

Research has found the closure of one venue reduced personal insolvencies by around two.⁹¹

While councils do not directly fund services used by people directly and indirectly affected by gambling-related harms, some incur costs associated with research and policy development, promoting alternatives to gambling and responding to applications for the expansion of gaming activity.⁹²

Protective and risk factors

Protective factors have may prevent or minimise gambling-related harms while risk factors may increase the risk or exacerbate existing levels of gambling-related harms.

Proposal features

Proposals for top ups are typically considered to have a smaller impact on exposure to EGMs than proposals for new gaming venues as a new gaming venue has a larger impact on a community's accessibility to EGMs.

Proposals associated with the closure of a gaming venue reduce the exposure to EGMs as they reduce accessibility to EGMs.

Proposals that enlarge the proportion of the floor area allocated to gambling activities increase exposure to gambling and reduce the proportion of the venue available to patrons to participate in non-gambling alternatives.

As discussed above, the Gaming Commission has found that wherever accessibility to EGMs is increased, there is always a risk of an increase in gambling-related harms which can lead to other costs such as lost productivity, increased health and social service requirements and other social costs.⁹³

⁸⁸ State Government of Victoria (2011) *Socio-economic impacts of access to electronic gaming machines in Victoria – Effects on demand and communities* Department of Justice

⁸⁹ Productivity Commission (2010)

⁹⁰ Victorian Competition and Efficiency Commission (2012) *Counting the Cost: Inquiry into the Costs of Problem Gambling*, final report, December

⁹¹ Badji, S, Black, N, Johnston, D, (2019), *Personal insolvencies and the availability of neighbourhood gaming venues*, Victorian Responsible Gambling Foundation, Melbourne.

⁹² Victorian Competition and Efficiency Commission *Counting the Cost: Inquiry into the Costs of Problem Gambling* 2012

⁹³ Commission Decision, Croydon Hotel, paragraph 90; Commission Decision, Dromana Hotel, paragraph 59, Commission Decision, Mornington on Tanti, paragraph 94, Commission Decision, Zagame's Berwick, paragraph 53

Venue features

Availability and quality of non-gambling activities and facilities

There is evidence indicating gambling in 'diffused sites', i.e. venues where gambling is not the main activity within the venue is less intense than gambling within concentrated sites i.e. those venues where gambling is the primary activity in the venue.⁹⁴ There is also evidence that the presence of a wide range of non-gambling activities is a protective factor.⁹⁵

One of the decision guidelines in Clause 52.28 Gaming of the Victoria Planning Provisions is the range of services and 'offer' provided by the gaming venue. The availability of non-gambling activities and facilities in a proposal site is typically considered a protective factor if they operate at the same time as the gambling facilities and activities.

Type

In some instances, the Tribunal and the Commission have regarded hotel venues as riskier than club venues for the following reasons:

Club activities, including the use of EGMs, are typically restricted to members of the club rather than the broader public, hence reducing overall exposure within the community. This membership arrangement has the potential to build community networks and enable patrons to develop long term relationships with staff and other patrons.⁹⁶

Clubs tend to offer a broader range of non-gambling social, leisure, sport and entertainment activities which provide diversionary activities other than gambling.⁹⁷

Size

The maximum number of EGMs permitted in Victorian gaming venues (clubs and hotels) is 105.

Larger gaming venues are considered riskier than smaller gaming venues.^{98, 99, 100, 101, 102, 103}

Design

The design of the venue affects exposure to gambling activities for both gambling patrons and patrons of the non-gambling activities.

The following design features of a gaming venue act as protective factors as they reduce exposure to gambling:

⁹⁴ Leino, T. et al (2017) 'Gambling behavior in alcohol-serving and non-alcohol-serving-venues: a study of electronic gaming machine players using account records' *Addiction Research & Theory* 25.:3, 201-297

⁹⁵ Hing, N. and Haw, J (2010) *The Influence of Venue Characteristics on a Player's Decision to Attend a Gambling Venue* Centre for Gambling Education and Research

⁹⁶ Thomas, A. Et al (2010), *Problem gambling vulnerability: The interaction between access, individual cognitions and group beliefs/preferences* Victorian Government, Office of Gaming and Racing, Department of Justice pxiii

⁹⁷ Hing, N. and Haw, J. (2010) *The Influence of Venue Characteristics on a Player's Decision to Attend a Gambling Venue* Gambling Research Australia

⁹⁸ Hing, N. and Haw, J (2010) *The Influence of Venue Characteristics on a Player's Decision to Attend a Gambling Venue* Centre for Gambling Education and Research

⁹⁹ Rockloff, M (2010) *The impact of an audience and venue size on poker machine gambling* Central Queensland University Institute of Health and Social Science Research,

¹⁰⁰ McMillen, J and Pitt, S (2005) *Review of the ACT Government's Harm Minimisation Measures* Centre for Gambling Research, ANU

¹⁰¹ Blaszczyński, A et al (2001) *The Assessment of the Impact of the Reconfiguration on Electronic Gaming Machines as Harm Minimisation Strategies for Problem gambling* University of Sydney Gambling Research Unit p17

¹⁰² Rockloff, M; Greer, N and Evans, L (2012) "The Effect of Mere Presence on Electronic Gaming Machine Gambling" *Journal of Gambling Studies*, October 2012, Issue 27

¹⁰³ Leino, T. et al (2017) 'Gambling behavior in alcohol-serving and non-alcohol-serving-venues: a study of electronic gaming machine players using account records' *Addiction Research & Theory* 25.:3, 201-297
https://www.academia.edu/32303619/Leino_T._Sagoe_D._Griffiths_M.D._Mentzoni_R.A._Pallesen_S._and_Molde_H._2017_.Gambling_behavior_in_alcohol-serving_and_non-alcohol-serving_venues_A_study_of_electronic_gaming_machine_players_using_account_records._Addiction_Research_and_Theory_25_201-207

Location of the gaming room is such that gaming patrons are required to pass through non-gambling activities to enter the gaming room.

Self-closing doors at the entrance to the gaming room.

Screening behind self-closing door at the entrance to the gaming room.

Access to natural light from the gaming room.

Lines of sight from the cashier's office to all EGMs.

Screening of external windows with obscure glass to minimise exposure of the EGMS to passers-by.

Noise attenuation measures in the gaming room to absorb sounds.

Visual and functional separation of children's play areas from the gaming room.

The following design features of a gaming room act as risk factors:

Entrance to the gaming room directly off the car park or street.

Location of smoking area off a gaming room.

Multiple entrances to the gaming room.

Lines of sight into the gaming room from entrances and windows.

Multiple lines of sight into a gaming room from non-gambling facilities.

Venue operations/harm minimisation

Responsible service of gambling refers to harm minimisation practices used in gambling venues and businesses. It includes both responsible service and consumption of gambling, enabling consumers in a regulated environment to make informed decisions about their participation in gambling.¹⁰⁴ These measures are required by law and are a statutory protective factor.

The Productivity Commission found "even policy measures with modest efficacy in reducing harm will often be worthwhile".¹⁰⁵

The presence of highly trained staff in the gaming room can be a protective factor against gambling-related harms.

However there is limited evidence available to confirm the effectiveness of most individual responsible gambling measures which are implemented in a gaming venue.¹⁰⁶ To the contrary, evidence has found policy measures implemented outside the control of venues (such as ATM removal, reduction in bet limits, EGM features and the prohibition of smoking) appear to be associated with more significant effects.¹⁰⁷ The research has found, therefore, that "in addition to lack of credible research data on the effectiveness of specific interventions, there is virtually no evidence to confirm their effectiveness".¹⁰⁸

The limited potential for responsible service of gambling measures to prevent and minimise harms associated with problem gambling has been acknowledged by the Tribunal. It has been determined that an applicant's commitment to responsible service of gambling and implementation of other harm

¹⁰⁴ Livingstone C. Rintoul A. & Francis L. (2014) *What is the evidence for harm minimisation measures in gambling venues?* Evidence Base 2: 1-24 p2

¹⁰⁵ Productivity Commission (2010) p2

¹⁰⁶ Livingstone C. Rintoul A. & Francis L. (2014) *What is the evidence for harm minimisation measures in gambling venues?* Evidence Base 2: 1-24

¹⁰⁷ Livingstone C. Rintoul A. & Francis L. (2014) *What is the evidence for harm minimisation measures in gambling venues?* Evidence Base 2: 1-24 p17

¹⁰⁸ Livingstone C. Rintoul A. & Francis L. (2014) *What is the evidence for harm minimisation measures in gambling venues?* Evidence Base 2: 1-24 p3

minimisation measures is 'in itself not a panacea for dealing with problem gambling'¹⁰⁹ and harm minimisation measures are not a 'silver bullet to the ills of problem gaming'.¹¹⁰ This is because, despite the implementation of these measures over a number of years, "the issue of problem gaming remains a very live and serious one, despite greater awareness and effort in the gaming industry regarding responsible gaming in recent years".¹¹¹

The Productivity Commission (2010) identified opening hours as a risk factor and has therefore recommended shutdown periods of at least 6 hours commencing no later than 2am.¹¹² Recent research has found that the use of EGMs in the late night (12am to 8am) is associated with higher intensity gambling and an increased risk of gambling-related harm.^{113 114}

Employees in gaming venues are at risk of gambling-related harms.¹¹⁵ Responsible Service of Gaming Codes of Conduct that permit staff to use the EGMs in the venue may therefore increase the risk of gambling-related harms amongst the staff.

Rewards programs associated with the accrual of rewards from player loss on EGMs may encourage people to gamble.

Venue operations such as serving food and beverages to patrons while they are using the EGMs, and permitting the reservation of EGMs in order to use another EGM do not encourage breaks of play.

Locational features

Availability of non-gambling activities and facilities

Availability of non-gambling activities and facilities in the surrounding area that operate at the same time as the gaming room is a protective factor as they provide patrons with alternatives to gambling activities. These facilities may include cinemas, community centres, restaurants and cafes, pubs, sport and recreation centres and clubs.

Convenience gambling

Convenience gambling is a determinant of gambling-related harm as it may encourage spontaneous and impulse gambling. Venues associated with predetermined decisions to travel, i.e. destination gaming venues, are considered to pose lower risks than convenience gaming venues.

The location of the venue in relation to other land uses and activities in the surrounding area, is one factor influencing spontaneous and impulse gambling. Functional and visual integration with, and proximity to the following land uses and activities have the potential to result in or exacerbate convenience gambling:

Residential land uses

Facilities associated with people's day to day activities such as train stations and transport interchanges, civic buildings, shopping strips and shopping centres.

Services and facilities used by people experiencing gambling-related harms (gambling-sensitive uses).

¹⁰⁹ Melbourne City Council V Kingfish Victoria Pty Ltd (2013) VCAT 371 Paragraph 170

¹¹⁰ Mt Alexander Shire Council v Victorian Commission for Gambling and Liquor Regulation Ltd (Red Dot) [2013] VCAT 101(14 February 2013)

¹¹¹ Melbourne City Council V Kingfish Victoria Pty Ltd (2013) VCAT 371 Paragraph 170

¹¹² Australian Government Productivity Commission (2010) p14.35

¹¹³ Stevens, M and Roy Morgan Research (2023) Impact of electronic gaming machine (EGM) late night play on EGM player behaviours Commissioned by NSW Responsible Gambling Fund

¹¹⁴ Smith, C et al (2019) Shutdown periods for electronic gaming machines Snapcracker Research and Strategy, Commissioned by the NSW Responsible Gambling Fund

¹¹⁵ Hing, N and Gainsbury, S (2011) 'Risky business: Gambling problems amongst gaming venue employees in Queensland, Australia' *Journal of Gambling Issues* Issue 25, June 2011

Groups at an elevated risk of gambling-related harm

Proposals that relocate EGMs away from areas of relatively high socio-economic disadvantage and vulnerability reduce the impact of EGM player loss on the incidence of gambling-related harms among groups in the community at an elevated risk of gambling-related harm. The potential for this protective factor to mitigate the impact of gambling-related harms depends on the extent of socio-economic disadvantage and vulnerability in the community within which the EGMs have been relocated.