

BEFORE THE VICTORIAN GAMBLING AND CASINO CONTROL COMMISSION

IN THE MATTER OF:

Application to amend venue operator licence conditions to increase electronic gaming machines (**EGM's**) at Club Officer (3 Niki Place, Officer) from 60 to 80 EGMs.

RESPONSE TO VGCCC ECONOMIC AND SOCIAL IMPACT SUBMISSION FORM – CARDINIA SHIRE COUNCIL

Council has prepared a comprehensive objection setting out in detail the basis for its opposition to the application.

This form is completed and provided in support of, and should be read together with, Council's substantive written submission. It is not intended to constitute Council's primary submission in this matter.

Council relies on:

- The independent Social and Economic Impact Assessment prepared by SymPlan, dated 25 May 2026 (**SymPlan SEIA**);
- Council's written objection opposing the application dated 25 May 2026 (**Council's Objection**); and
- the former Victorian Commission for Gambling and Liquor Regulation's reasons for its decision refusing an earlier application to increase gaming machine numbers at Club Officer from 60 to 80 EGMs, in 2017.

PART B – ECONOMIC AND SOCIAL IMPACT

1. MUNICIPAL DISTRICT PROFILE

Question:

What is the profile of your municipal district?

Council Response:

Cardinia Shire is a rapidly growing outer-metropolitan municipality within Melbourne's south-east growth corridor, experiencing substantial residential expansion, particularly within Officer, Pakenham and surrounding growth-area communities. The municipality is characterised by significant numbers of younger family households, high levels of mortgage indebtedness associated with newer housing estates and increasing exposure to broader cost-of-living pressures affecting outer-suburban communities.

Although certain municipal-level socio-economic indicators suggest relative socio-economic advantage when assessed across the municipality as a whole, both the Applicant's material and the SymPlan SEIA identify pockets of socio-economic vulnerability and financial stress within parts of the catchment, particularly within Officer and Pakenham. Those indicators include housing and mortgage stress, concentrations of lower-income households, welfare dependency within parts of the catchment, and financial vulnerability associated with rapid population growth.

Cardinia Shire presently contains multiple gaming venues and widespread accessibility to electronic gaming machines. Club Officer already records the highest player loss per EGM within the municipality, indicating existing elevated gambling expenditure at the venue notwithstanding current gaming machine availability.

The municipality also contains a substantial and growing network of community, sporting and recreational facilities servicing rapidly expanding residential communities, with Council placing significant emphasis on community wellbeing, family-oriented recreation and harm prevention within its strategic planning framework.

2. LOCATION

2.1 Accessibility and Alternative Venues

Question:

In your opinion, does the applicant's proposal accurately describe the liquor, hospitality, social and/or recreational venues that are available nearby for community members who seek an alternative to gaming? If no, please describe your understanding of the location and surroundings of the venue.

In your opinion, does the applicant's proposal accurately describe the liquor, hospitality, social and/or recreational venues that are available nearby for community members who seek an alternative to gaming? If no, please describe your understanding of the alternative venues located near the premises.

Council Response:

No.

Council does not accept the Applicant's proposal fully or accurately describes the alternative liquor, hospitality, social and recreational facilities available within the surrounding catchment.

The Officer/Pakenham corridor already contains a broad range of hospitality, entertainment, sporting and community facilities, including existing licensed venues such as:

- Cardinia Club;
- Pakenham Racing Club;
- The Pakenham Hotel; and
- other hospitality venues operating within the broader catchment.

The surrounding municipalities also contains multiple sporting clubs, restaurants, cafés, community halls and Council-operated community facilities capable of accommodating functions, events and social gatherings without reliance on expanded gambling facilities.

Council further notes the SymPlan SEIA identifies several alternative community and function facilities operating within the surrounding catchment, including the:

- Cardinia Cultural Centre;
- Officer Community Hub;
- Pakenham Hall;
- Deep Creek Reserve Community Pavilion; and

- other Council and community-operated facilities already providing function, meeting and community event spaces.

Council submits the existence of these alternative facilities materially reduces the weight properly attributable to the asserted social benefit associated with the proposed function and hospitality facilities.

2.2 Proximity to Sensitive Uses

Question:

In your opinion, does the applicant's proposal accurately describe the sensitive uses located near the venue? If no, please describe your understanding of the sensitive uses located near the venue.

Council Response:

No.

Council does not accept the proposal adequately addresses the sensitive uses, community facilities and vulnerable populations located within the surrounding catchment.

The SymPlan SEIA identifies the proposal site is located within a rapidly expanding residential growth corridor characterised by substantial family-oriented residential development and younger household demographics. The predominant surrounding land use within the proposal site's catchment is residential.

There are several nearby community and sensitive uses, including:

- an early learning centre adjoining the site to the north (presently under construction);
- the Officer Community Hub approximately 2 kilometres from the venue; and
- the Toomah Community Centre, located approximately less than 1 kilometre from the venue, providing access to a range of community and social support services, including services delivered by Windermere;
- multiple surrounding community, sporting and recreational facilities servicing the Officer/Pakenham growth corridor; and

several nearby schools, including Bridge Road Primary School, John Henry Primary School, Officer Secondary College, and Officer Specialist School. The proposal site also benefits from high levels of accessibility and integration within the surrounding community, including proximity to:

- Cardinia Road Station approximately 580 metres from the venue; and
- the Lakeside Square shopping complex approximately 450 metres from the venue.

Council submits the proposal site's proximity to surrounding community facilities, residential areas and transport infrastructure increases community exposure and accessibility to gambling activity within a family-oriented catchment. The SymPlan SEIA further identifies significant indicators of socio-economic vulnerability affecting parts of the catchment, including concentrations of welfare dependency within Pakenham and Officer/Officer South and pockets of socio-economic disadvantage within the proposal site's primary and secondary catchments.

Question:

What impact do you believe the proposal would have on the nearby sensitive uses?

Council Response:

Council submits the proposal is likely to adversely affect nearby sensitive uses through increased exposure to gambling activity and gambling-related harm within the surrounding catchment.

The surrounding area includes family-oriented residential communities, an adjoining early learning centre (presently under construction), nearby community facilities, recreational precincts and broader community infrastructure servicing children, young persons and families within the Officer/Pakenham growth corridor.

Council submits increased gambling accessibility and increased gambling expenditure associated with the proposal may adversely affect the wellbeing of nearby residents and communities through increased financial stress, family conflict, housing insecurity and broader gambling-related harm experienced within affected households.

Council is particularly concerned the proposal will increase exposure to gambling activity within a rapidly expanding family-oriented growth corridor already experiencing indicators of financial vulnerability, housing stress and broader cost-of-living pressures.

In Council's submission, those impacts assume greater significance given the proposal is expected to generate substantial levels of additional gambling expenditure and 'new expenditure' within the municipal catchment.

3. GAMING COMPETITION**Question:**

In your opinion, does the applicant's proposal accurately describe the existing level of competition in the area surrounding the premises?

Council Response:

No.

Council submits the Applicant's assessment of gaming competition incompletely addresses the broader gambling environment within the municipal district.

If no, please describe your understanding of the gaming competition in the area surrounding the premises.

Cardinia Shire already contains multiple gaming venues and substantial existing accessibility to electronic gaming machines. The SymPlan SEIA identifies several existing gaming venues operating within the surrounding catchment, including:

- Cardinia Club;
- Pink Hill Hotel;
- Pakenham Racing Club (which does not operate electronic gaming machines but does provide betting and wagering facilities);
- The Pakenham Hotel; and
- broader existing gaming accessibility throughout the municipal district.

Council further notes the former Victorian Commission in refusing the 2017 application accepted there was already 'wide access' to EGMs within the municipality.

Council submits the proposal is unlikely to materially improve genuine competitive outcomes or consumer choice and instead is more likely to increase aggregate gambling expenditure and gambling-related harm within the municipal district.

Council further submits the existence of multiple established gaming venues within relatively close proximity to Club Officer materially weakens any suggestion the proposal is necessary to address insufficient gambling access or unmet demand for gaming opportunities within the catchment.

4. PROBLEM GAMBLING AND GAMBLING-RELATED HARM

4.1 The Vulnerability of the Municipal District

Question:

Please describe the level of vulnerability within the community.

Council Response:

Council submits the community exhibits a significant level of vulnerability to gambling-related harm, particularly within parts of the Officer/Pakenham growth corridor.

While broad municipal SEIFA indicators may suggest relative socio-economic advantage at a municipal level, Council submits those broad indicators mask pockets of vulnerability and financial stress within the Officer/Pakenham growth corridor.

The SymPlan SEIA identifies a range of indicators associated with socio-economic vulnerability within the catchment, particularly in Officer and Pakenham, including housing and mortgage stress, financial vulnerability arising from rapid residential growth, pockets of lower household income and welfare reliance, and demographic characteristics associated with heightened gambling risk. The SEIA concludes the proposal is likely to increase exposure to gambling-related harm within those communities.

Council further notes the former Victorian Commission accepted similar concerns in refusing the 2017 application.

4.2 Services within the municipal district

Question:

Please list the names, addresses and contact numbers of services in your municipal district that specifically or substantially deal with vulnerable members of the community, problem gambling or gambling-related harm.

Council Response:

SSI

1 118/126 Walker Street Dandenong, VIC 3175

1800 279 586

Headspace Pakenham (services offered for 12-25 year olds)

Corner Main Street and McGregor St, Pakenham VIC 3810

(03) 5942 2600

Gambler's Help Southern

186 Foster Street East Dandenong Vic 3175

(03) 9575 5353

South East Community Links

5 Osborne Avenue, Springvale 3171

(03) 9546 5255

Question:

How many members of the community made contact with each of these service providers in the previous 12 months?

Council Response:

Unknown.

Question:

How many of these contacts related specifically to EGM-related problems?

Council Response:

Unknown.

Question:

For existing venues, how many of these contacts related specifically to EGM-related problems at the premises the proposal relates to?

Council Response:

Unknown.

4.3 The Proposed Approach to Minimising Harm

Question:

Does your municipality have a gambling policy? If yes, is the proposal consistent with this policy? If no, please describe how the proposal is not consistent.

Council Response:

Yes.

Cardinia Shire Council adopted its *Gambling Harm Prevention and Minimisation Policy* in July 2024.

The policy establishes Council's whole-of-organisation approach to minimising and preventing the health, social and economic harms associated with gambling within the municipality and provides clear direction regarding Council's approach to assessing EGM applications.

Council submits the proposal is inconsistent with the policy for several reasons.

First, the policy expressly recognises gambling-related harm as a public health issue and identifies Council's role in minimising harm associated with gambling, particularly electronic gaming machines.

Second, clause 1.2 of the policy states Council will oppose applications for increases in EGM licences where an application is shown to elevate the risk of gambling-related harm within vulnerable communities through a social and economic impact assessment.

Council submits the present proposal is expected to materially increase gambling accessibility and gambling expenditure within the municipal catchment, including substantial levels of 'new expenditure', and therefore materially elevate the risk of gambling-related harm within vulnerable parts of the Officer/Pakenham growth corridor.

Third, the policy specifically identifies the importance of considering socio-economic vulnerability, gambling-related harm, public health impacts and the social and economic consequences of EGM applications within Cardinia Shire.

Council further notes the policy expressly supports a public health approach to gambling harm minimisation and opposition to EGM increases where applications may adversely affect vulnerable communities or increase exposure to gambling-related harm.

In Council's submission, the proposal is inconsistent with both the objectives and operative provisions of *Council's Gambling Harm Prevention and Minimisation Policy* because it will materially increase gambling accessibility and gambling-related harm risks within the municipal district.

Question:

Do you have any concerns with the applicant's proposed approach to minimising harm?

Council Response:

Yes.

Council has concerns regarding the adequacy of the Applicant's proposed harm minimisation approach.

Council acknowledges the Applicant proposes a range of harm minimisation measures. However, Council submits those measures do not adequately address the increased gambling accessibility and increased gambling expenditure anticipated to result from the proposal.

Council further notes:

- the proposal is expected to generate substantial levels of additional gambling expenditure and 'new expenditure' within the community;
- the proposal will materially increase gambling accessibility within the municipal catchment;
- significant gambling reform measures directed toward reducing gambling-related harm are presently being implemented within Victoria; and
- the Applicant's own compliance material identifies aspects of the venue's harm minimisation framework which remain capable of further improvement.

In these circumstances, Council submits the proposed harm minimisation measures do not sufficiently offset the likely social risks associated with the proposal.

5. COMMUNITY WELLBEING

5.2 Feedback from Businesses, Individuals or Organisations

Question:

Have you conducted a community survey in relation to the proposal? If yes, please summarise the survey methodology and the results. Please also attach the survey.

Council Response:

While Council has not conducted a community survey specifically in relation to the proposal, Council conducts a *Household Liveability Survey* every 2–3 years.

The most recent survey was undertaken in 2023. It involved a random sample of 6,278 households, with proportional representation across all localities within Cardinia Shire. The survey was conducted between June and July 2023, with a total of 870 completed responses received.

The 2023 Household Liveability Survey identified significant community concern regarding gambling-related harm and electronic gaming machines, including that:

- 85% of respondents agreed or strongly agreed that the community should have less exposure to gambling advertising;
- 79% of respondents agreed or strongly agreed that the Victorian Government should increase regulation of poker machines;
- 77% of respondents agreed or strongly agreed that harm from gambling is a public health issue;
- only 41% of respondents agreed or strongly agreed that gaming venues provide community benefits such as employment, affordable meals, and support for local organisations; and
- 26% of respondents reported experiencing gambling-related harm either personally or through a close friend or family member. Reported harms included emotional, relationship, financial, physical health and work-related impacts.

The survey also identified disproportionate impacts among culturally and linguistically diverse communities. Respondents who speak a language other than English at home more frequently reported experiencing gambling-related harm themselves (13%, compared to 7% for English-only speakers) and/or through a friend or family member (29%, compared to 21% for English-only speakers).

Council considers these results demonstrate a clear and sustained level of community concern regarding gambling harm and support for stronger gambling regulation measures.

Council's 2026 Household Liveability Survey is currently being undertaken.

Question:

Have you received submissions from businesses, individuals or organisations in relation to the proposal? If yes, please briefly summarise the issues raised by these submission(s). Please also attach the submission(s).

Council Response:

No.

6. COMMUNITY CONTRIBUTIONS

Question:

If you wish to provide feedback on the applicant's proposed community contributions, please provide your response in this section.

Council Response:

Council submits limited weight should be attributed to the Applicant's asserted community contribution case.

While the proposal may produce some limited venue amenity and hospitality benefits, Council submits the evidence does not establish the proposal will generate substantial offsetting community benefits sufficient to outweigh the likely social disbenefits associated with increased gambling expenditure and gambling-related harm.

Council further notes the SymPlan SEIA concluded there is 'no specific commitment to increase contributions based directly on the outcome of this application' and identified only 'very limited community benefit associated with the venue's operations'.

7. CONCLUSIONS

7.1 The Net Impact on the Municipal District

Question:

In the Council's opinion, what is the anticipated net economic and social impact of the proposal on the wellbeing of the municipal district?

Council Response:

Negative.

Council submits the Applicant has failed to establish the proposal will produce a neutral or positive net social and economic outcome for the community.

Council submits the proposal is likely to:

- materially increase gambling accessibility;
- generate substantial additional gambling expenditure within the community;

- increase exposure to gambling-related harm within vulnerable parts of the municipal catchment; and
- produce social disbenefits which outweigh the limited asserted economic and amenity benefits associated with the redevelopment proposal.

7.2 Improving the Anticipated Impact of the Proposal

Question:

Are there any changes to the applicant's proposal that you believe would improve the anticipated impact of the proposal?

Are there any conditions that you believe would improve the anticipated impact of the proposal on the proposal?

Council Response:

Council maintains its objection to the proposal in its current form.

Council submits the proposal fundamentally depends on increased gambling accessibility and increased gambling expenditure within the municipal catchment. In these circumstances, Council does not consider minor operational amendments or permit conditions will adequately address the broader social and economic harms identified in Council's submission and the SymPlan SEIA.

Council therefore considers the proposal is not capable of being satisfactorily mitigated through conditions alone.

7.3 The impact on surrounding municipal districts

Question:

Have any surrounding Councils advised you of their position in relation to the application?

Council Response:

Council understands the City of Casey also intends to provide a submission to the Victorian Gambling and Casino Control Commission in relation to the application.

Given the proposal's proximity to the Cardinia–Casey municipal boundary and the broader regional catchment served by the venue, Council considers the potential social and economic impacts of the application may extend beyond the Cardinia municipality.

Question:

If yes, in the opinion of the majority of the surrounding Councils, what is the anticipated net economic and social impact of the proposal on the surrounding municipal districts?

Council Response:

Unknown.

Question:

If the surrounding councils have expressed views about the proposal, please briefly summarise those views here. Please also attach any supporting documentation.

Council Response:

Unknown.

8. OTHER COMMENTS ON APPLICANT'S PROPOSAL**Question:**

If you have any other comments about any part of the applicant's proposal or application, please provide them here.

Council Response:

Council directs the Commission to:

- Council's Objection more fulsomely setting out Council's concerns with the proposal; and
- the SymPlan SEIA on which Council relies on.