

Client  
P.J Cook Investments Pty Ltd

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Planning

Transport

Urban Design

Waste Management

Landscape Architecture

Civil Engineering

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# Social and Economic Impact Assessment Fyansford

## 67 Hyland Street, Fyansford

# ratio:

**Project**  
Fyansford

**Prepared for**  
P.J Cook Investments Pty Ltd

**Our reference**  
21065R001

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# 1. Introduction

## 1.1. Introduction

1. Ratio Consultants have been requested by P.J. Cook Investments Pty Ltd (the applicant) to review the social and economic impacts of a proposal to install 28 additional electronic gaming machines (EGMs) at the Fyansford Hotel, located at 67 Hyland Street, Fyansford.
2. The applicant has entered into an agreement with the operator of the Bell Park Sport & Recreation Club which currently operates 28 EGMs at the venue located at 34/70 Calvert Street, Hamlyn Heights. The agreement facilitates the transfer of 28 Club entitlements out of the Greater Geelong LGA to allow the applicant to transfer 28 Hotel entitlements into the LGA to be operated at the Fyansford Hotel. This will result in no net increase in gaming machines in the Greater Geelong LGA (which is subject to a regional cap) and the cessation of the Bell Park Sport & Recreation Club as a gaming venue. Additionally, in exchange for the transfer of entitlements the applicant will enter into to a long-term sponsorship agreement with the Club.
3. This proposal is subject to approval by the Victorian Gambling and Casino Control Commission (VGCCC). A separate application for the planning approval for the proposal including the additional 28 machines has been lodged with Greater Geelong Council.
4. I have been specifically asked to review the social and economic impacts of the proposal in response to the approval of the 28 additional gaming machines and corresponding improvements to the venue.
5. On balance, I am satisfied that the introduction of the additional 28 EGMs to the venue will have a slightly positive social and economic impact on the City of Greater Geelong community.
6. A copy of my Curriculum Vitae is included as Appendix A.

## 1.2. Facts, Matters and Assumptions

7. In forming recommendations and a view about this proposal, I have relied upon:
  - A review of various literature sources referenced in this statement.
  - Maps prepared by my office as sourced.
  - Site inspection of the site and surrounds.
  - Additional information obtained from the ABS, Council's website and other sources in relation to socio/economic data and the local area.
  - Assessed the proposal against the relevant policies contained within the Greater Geelong Planning Scheme.



- My review of other material, such as the City of Greater Geelong’s Gambling Harm Minimisation Policy, the City of Geelong Council Plan 2025-29 and the City of Greater Geelong Community Health and Wellbeing Strategy 2025-29.
- The ‘Victorian Population Gambling and Health Study’, March 2020, released by the Victorian Responsible Gambling Foundation.
- Instructions from the Applicant pertaining to the proposed operation of the venue.
- Architectural plans, prepared by HP Architects.
- Mr. Tim Stillwell in relation to expenditure projections.
- DNS Venue Services in relation to responsible gambling practices.

### 1.3. Summary and Opinion

8. In summary, I consider that:

- The proposal for 28 additional electronic gaming machines will have a slightly positive social and economic impact on the local community and the City of Greater Geelong.
- The revenue from the additional machines will allow the Hotel to make further alterations and improvements to the building at a cost of approximately \$2 million, including the expansion of the bistro which will include the ability to provide additional function spaces for the local community and additional car parking.
- The benefits associated with the proposal include the closure of a gaming venue (the Bell Park Sport & Recreation Club) and relocation of machines away from an area that experiences greater disadvantage. Additionally, it will ensure the ongoing viability of the Club through the sponsorship agreement of \$120,000 p.a. and move machines away from a facility focussed on younger people.
- These benefits will outweigh the potential disbenefits, including the potential risk of increased gambling behaviour, which will be partially offset by the closure of a gaming venue as well as through the responsible gambling practices adopted by the applicant.

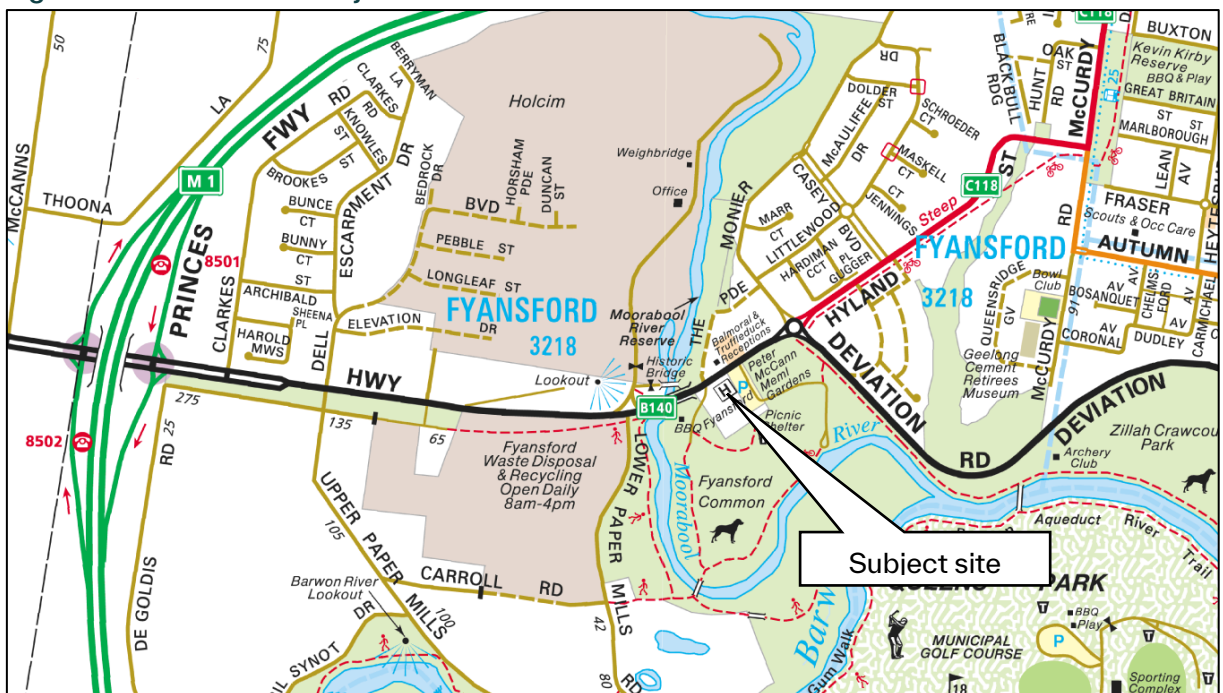
9. These conclusions are expanded upon in the following sections of this report.

## 2. Subject site and surrounds

### 2.1. The Location

10. The subject site is located on the southern side of Hyland Street, approximately 80 metres east of the Moorabool River and backs onto the Fyansford Common. The Hotel's street address is 67 Hyland Street, Fyansford.
11. The site is regular in shape and has a frontage to Hyland Street. The hotel building occupies the northern half of the site with at-grade carparking located to the rear of the building. There is additional at-grade carparking located to the east of the site which is provided for the adjoining parklands. The title of the land extends beyond the car park area at the rear and into the grassed area of Fyansford Common.
12. Vehicle access is provided directly from Hyland Street.

Figure 2.1: Location of subject site



Source: [www.street-directory.com.au](http://www.street-directory.com.au)

### 2.2. Surrounds

13. The Fyansford Hotel is located at the southeastern edge of Fyansford and sits above the banks of the Moorabool River. It is approximately 170 metres southwest of the intersection of Deviation Road and Hyland Street and backs onto Fyansford Common.

14. The Fyansford Hotel is located within a Mixed Use Zone and is generally surrounded by open parklands to the south, west and east. A large informal gravel car park is located immediately east of the site. The nearest residential properties are located to the north of the site on the opposite side of Hyland Street in the Commercial 1 Zoned land.
15. Residential development is generally located on the northern side of Hyland Street whilst the southern side remains largely undeveloped.
16. Immediately opposite the site is Truffleduck, a wedding and function venue and a Thirsty Camel bottleshop (previously located on the site).
17. Hyland Street is a major arterial road, forming part of the Hamilton Highway. In the vicinity of the site, there is one traffic lane in each direction.
18. The hotel, and Fyansford generally, is located at the western edge of the metropolitan Geelong area, and due to its location at the bottom of a steep escarpment and the northern side of the Moorabool River, is visually and physically isolated from much of the established part of Geelong.

**Figure 2.2: Aerial photograph of site and surrounds**



Source: Landchecker (captured 21 June 2025)

### **2.3. The City of Greater Geelong**

19. The City of Greater Geelong is located approximately 75 kilometres south-west of the Melbourne CBD. It comprises an area of 1,240 square kilometres and contains a mixture of rural and coastal landscapes and urban and rural townships.
20. The City of Greater Geelong comprises an extensive coastline to Port Phillip Bay (to the east) as well as a small section of coastline to Bass Strait (to the south). The municipality otherwise shares its borders with the Shire of Surf Coast (to the south-west), Shire of Golden Plains (to



the west) and the Shire of Moorabool (to the north-west), and the City of Wyndham (to the north-east).

21. In 2021, the City of Greater Geelong had a population of 271,057 people<sup>1</sup>, with areas of population growth concentrated in the outer suburbs of urban Geelong, around the central section of the municipality.
22. The City of Greater Geelong comprises the entire urban area of Geelong, the rural land to the north-west and south of the urban area, and most of the Bellarine Peninsula (to the south-east of urban Geelong).
23. Townships in the municipality include but are not limited to Portarlington, Indented Head, St Leonard's, Leopold, Ocean Grove, Drysdale, Clifton Springs, Barwon Heads, Anakie, Batesford, Lara and Ceres.

**Figure 2.3: City of Greater Geelong in relation to Melbourne CBD**



Source: Landchecker, prepared by Ratio Consultants

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<sup>1</sup> ABS Census 2021

# 3. The Fyansford Hotel

## 3.1. Existing buildings and facilities

24. The Fyansford Hotel is a two-storey building that was constructed in 1854. It most recently underwent renovations in 2013/14 at a cost of \$2.1 million. Premises approval for 40 EGMs was granted by the then VCGLR in June 2012 and following a favourable VCAT decision, the Hotel began trading as a gaming venue in 2014.
25. The building is constructed to its northern and western boundaries with the main entrance located along its eastern boundary. At grade marked and informal car parking is located to the east and south of the building. There is a secondary entrance directly accessed from Hyland Street.
26. The hotel comprises a range of facilities including:
  - Bistro and lounge area with seating for 234 patrons including an enclosed area which can be partitioned off for private functions (Riverside Room).
  - Main bar and TAB (44 patrons).
  - External courtyard and outdoor dining area with seating for 101 patrons fronting Hyland Street.
  - Function room (Hyland Room) with capacity for 61 patrons.
  - Children’s playroom.
  - Gaming room with 39 EGMs and an external smoking courtyard.
27. An existing conditions plan is attached at Appendix B and a series of photos of the venue is provided at Appendix C.
28. The liquor licence permits the Hotel to trade 7 days a week with the following hours of operation for consumption on the premises:

– Sunday	Between 10am and 12 midnight
– Good Friday & ANZAC Day	Between 12noon and 2am the following morning
– On any other day	Between 7am and 2am the following morning
29. The venue currently generally trades between 10am and 2am Monday to Saturday and between 10am and midnight on Sunday.
30. The liquor licence also includes a maximum patron capacity of 300 patrons with the following maximum capacities for outdoor areas:
  - Outdoor area 1: 184 patrons

- Outdoor area 2: 77 patrons
- Outdoor area 3: 18 patrons

### 3.2. Community Contributions

31. During the 2024-2025 financial year, the Hotel has donated in excess of \$55,000 in cash to various community and sporting groups as follows:

– Bell Park Cricket Club	\$3,636
– Bell Park Sports & Recreation Club	\$1,404
– Bannockburn Football & Netball Club	\$21,500
– Geelong Swimming Club	\$6,818
– Thomson Football Club	\$400
– Bannockburn Cricket Club	\$2,000
– Newtown & Chilwell Football & Netball Club	\$20,455
– Rotary Club of Highton	\$500

32. In addition to the above cash contributions, the Hotel also provided various 'in-kind' donations in the form of meal / gift vouchers to the value of \$2,402 during the 2024-2025 financial year.

### 3.3. Functions

33. There are four areas within the Hotel which are currently used to host functions. The main function spaces are the Hyland Room and the Riverside Room. However, functions can also be held in the lounge and the courtyard.

34. A variety of functions take place at the venue including occasion (i.e. 21st, 30th, 50th etc) birthdays, engagement parties, wedding/receptions, baby showers, wakes and work functions.

35. During the 2024 calendar year, the venue hosted approximately 117 functions.

36. There are several factors that influence the Hotel's ability to hold functions including:

- The absence of a bar in the Riverside Room.
- Lack of private spaces when both the Hyland and Riverside Rooms are booked as customers often don't want to share spaces.
- Rooms being too small or too large to cater for the group.
- Courtyard is exposed to weather.

37. I am advised that these factors contribute to function enquiries not being able to be secured at the venue.

### 3.4. Employment

38. The Hotel currently employs 51 staff which equates to approximately 34.5 EFT positions comprising 14 full time staff, 3 part time staff and 34 casual staff in the following roles:

– Kitchen	15.0 EFT
– Management	4.0 EFT
– Gaming	6.0 EFT
– Bottleshop	3.5 EFT
– Bar/bistro	6.0 EFT

39. The majority of staff (81.1%) live within the Greater Geelong LGA. The remaining 18.9% of staff live in the LGAs surrounding Greater Geelong including the Surf Coast, Golden Plains and Wyndham LGAs.

# 4. The Proposal

## 4.1. Improvements to the venue

40. It is proposed to increase the number of machines at the Fyansford Hotel by 28, taking the total approved number of EGMs to 68. The machines will be relocated from the Bell Park Sports & Recreation Club via an agreement between the two entities. The result will be the cessation of gaming at the Bell Park Sports & Recreation Club and a net decrease in the number of gaming venues within the City of Greater Geelong.
41. The additional machines will enable further improvements to the venue. More specifically, the proposal includes:
  - Expansion of the bistro including 160 additional seats.
  - Expansion of the children's playroom (from 27m<sup>2</sup> to 60m<sup>2</sup>)
  - Creation of new external terrace accessed from the expanded bistro.
  - Expansion and renovation of the gaming room to accommodate 68 EGMs. Alterations to the entrance to the gaming room to provide increased screening from the bistro.
  - Reconfiguration and formalisation of the car park to accommodate the expansion and increase the on-site parking by 6 spaces.
42. The expanded bistro and additional seats will create spaces for the venue to hold additional functions which it is not currently able to do due to various factors such as the size of spaces or privacy.
43. A copy of the proposed plans is provided in Appendix D. These plans are subject to a separate application for planning approval which is currently being considered by the City of Greater Geelong.
44. The estimated cost of all works is approximately \$2 million, and it is estimated that all works would be completed within 24 months of all relevant approvals being granted.

## 4.2. Additional Employment

45. It is expected that the proposal will create an additional 6.1 EFT positions in the following areas:
  - Gaming room (2.9 EFT positions)
  - Bistro and bar (3.2 EFT positions)
46. In addition to the above, a further 4 short term EFT positions will be created during the construction period.



47. It is the applicant's intention that approximately 80% of the trades be sourced from local companies within the City of Greater Geelong as they have used these companies for previous works on the Hotel.

### 4.3. Community Contributions

48. The applicant has entered into a GME & Sponsorship Deed with BelRec Inc (Bell Park Sports & Recreation Club) in relation to the removal of 28 EGMs from the latter's venue and out of the LGA to allow the relocation of 28 hotel entitlements into the LGA for operation at the Fyansford Hotel.
49. Whilst there are various sponsorship sums payable to the Club following various approvals, the ongoing sponsorship once the machines are operational at the Hotel will be \$10,000 per month (\$120,000 p.a indexed to CPI) in perpetuity.
50. The removal of gaming machines from the Bell Park Sports & Recreation Club and the ongoing sponsorship will enable the Club to repurpose the existing gaming room to enhance the overall offer at the venue. In particular, the new facilities will include:
- Expanded social spaces to support larger community gatherings, meetings and social events.
  - Multi-use function rooms that will enable workshops, fitness classes and club related activities. Spaces will be available for hire to local organisations for events and meetings.
  - Upgraded and expanded bistro, creating a more family friendly dining experience.
51. Additionally, the sponsorship monies will be allocated to key areas of the Club to ensure its ongoing viability and sustainability including:
- Sports development: funding for coaching, equipment and player development.
  - Community engagement: hosting community focused events, sports clinics and initiatives aimed at getting the community moving.
  - Covering operational costs of the Club
52. I am also advised that the presence of gaming at the Club makes it difficult to secure funding / grants. Their removal will provide more opportunities where the application for these funds / grants would produce a favourable outcome. Complementary Expenditure
53. It is estimated that the proposed works will result in increased patronage of the venue in the order of 440 persons per week. It is expected that this will generate approximately \$1.03 million in additional complementary expenditure in its first full year of operation.

### 4.4. Expenditure Analysis

54. Mr. Tim Stillwell has estimated that the application would increase net expenditure within the City of Greater Geelong in the first year of operation by between \$447,349 and \$595,904 (assuming a transfer rate of 40% and allowing for lost gaming expenditure).
55. Assuming that there are to be no other changes to the gaming environment and, using the adult population figures provided by the VGCCC, this application is expected to increase

expenditure per adult in Geelong from \$601.25 to between \$603.16 and \$603.80. This is an increase of between \$1.91 and \$2.55 per adult (an increase of between 0.3% and 0.4%).

# 5. The Study Area

56. In determining the patron profile of the venue, it is important to determine whether the venue serves a predominantly local catchment or a broader one. Given the location of the site within an established suburban area, the venue would likely serve a predominantly local role, meeting the needs of local residents.
57. Based on previous experience and undertaking of patron surveys in a wide variety of gaming venues, I estimate that in the order of 60-80% of patrons would come from a 2.5km – 5km radius. This is consistent with the findings of the Victorian Longitudinal Community Attitudes Survey 2003 as well as the membership data for the venue.
58. The patron profile for the Fyansford Hotel has been established by conducting a suburb survey of the patronage of the gaming room during two weeks between 6 September 2025 and 19 September 2025 (inclusive).
59. The gaming room patron survey was undertaken in the gaming room on the hour for every hour that the gaming room was operational and patrons using the gaming machines were asked the suburb of their residence.
60. The results of the patron surveys are summarised in the table below with a full copy provided in Appendix E. This table uses the ‘top’ suburb responses from the survey (5% or higher), which effectively identifies the patron catchment of the hotel.

Figure 5.1: Fyansford Hotel Gaming Patron Surveys

Suburb	Total number of patrons	Gaming patron survey results
Bannockburn	89	11.2%
Fyansford	88	11.0%
Hamlyn Heights	60	7.5%
Corio	48	6.0%
Bell Post Hill	45	5.6%
Newtown	41	5.1%
<b>TOTAL SURVEYED</b>	<b>797</b>	

Source: Fyansford Hotel Gaming Patron Surveys September 2025

61. Based on the patron surveys, the patron catchment of the hotel comes from the suburbs of Bannockburn, Fyansford, Hamlyn Heights, Corio, Bell Post Hill and Newtown. Overall, residents from these suburbs account for just under half (46.5%) of all patrons in the gaming room. Whilst this is on the lower side, it indicates that the venue draws patrons from a wider catchment.
62. Given that the proposal includes a transfer of all existing machines from the Bell Park Sport & Recreation Club, it is also important to understand the patron catchment of this venue. I would expect there to be some crossover of patrons, albeit this will be minor given the proximity of the venues and the different venue types i.e. a club venue versus a hotel venue.

**Figure 5.2: Bell Park Sport & Recreation Club Patron Surveys**

Suburb	Total number of patrons	Gaming patron survey results
Hamlyn Heights	94	35.3%
Herne Hill	27	10.2%
Manifold Heights	25	9.4%
Bell Park	21	7.9%
Geelong West	18	6.8%
Bannockburn	18	6.8%
Fyansford	16	6.0%
Corio	16	6.0%
<b>TOTAL SURVEYED</b>	<b>266</b>	

63. The primary patron catchment of the Bell Park Sport & Recreation Club comprises the suburb of Hamlyn Heights with the secondary patron catchment comprising the suburbs of Herne Hill, Manifold Heights, Bell Park, Geelong West, Bannockburn, Fyansford and Corio.
64. Given the overlap of patrons between the two venues, those suburbs that are represented in the patron catchment of both venues will be used for the purposes of the social and economic analysis. This includes the following suburbs: Bannockburn, Fyansford, Hamlyn Heights, Corio, Bell Post Hill and Newtown. These suburbs are generally located between 2.5km to 5km from the Fyansford Hotel and is consistent with the findings of the Victorian Longitudinal Attitudes Survey 2003 which found the majority of people play within their local area.
65. Given that the proposal includes the relocation of EGMs from an existing venue and the extent of patron overlap, I would not expect there to be any significant change to the patron catchment of the Fyansford Hotel as a result of this application.



Figure 5.3: Patron catchment map



Source: Landchecker, prepared by Ratio Consultants



# 6. Greater Geelong Decision Making Framework

## 6.1. Introduction

66. We understand that a planning permit is required for the proposed increase in EGMs at the Hotel and that a separate application will be lodged with Council. For completeness, we have reviewed the Municipal Planning Strategy (MPS) and Planning Policy Framework for any references to gaming as well as the particular provision at Clause 52.28 which sets out the specific criteria for the location of gaming machines as well as venues for gaming machines.
67. This assessment assists the Council in its decision-making process and confirms the appropriate nature of the venue.
68. We have also reviewed other relevant Council documents such as the City of Greater Geelong Council Plan 2025-29, City of Greater Geelong Community Health and Wellbeing Strategy 2025-29 and Gambling Harm Minimisation Policy.

## 6.2. The Greater Geelong Planning Scheme

### MPS

69. Clause 02.03-10 of the MPS relates specifically to gaming. It acknowledges that the municipality has a high overall density of gaming machines and level of expenditure that exceeds the Melbourne and State averages.
70. In particular, it recognises that there is research that shows there are links between social disadvantage, problem gambling and proximity to gaming venues and that gaming machines may be accessible but not convenient so that a pre-determined decision is required to access them.
71. The relevant strategic direction is to:
- *Minimise the risk of exacerbating problem gambling by directing the location of machines to venues that makes gaming accessible but not convenient.*

### CLAUSE 52.28 GAMING

72. The schedule to Clause 52.28 includes the following objectives:
- *To minimise the risk of exacerbating problem gambling.*
  - *To protect the operations and amenity of existing uses surrounding gaming venues.*
  - *To ensure that the area, site and venue characteristics contribute to net community benefit.*

73. Clause 2.0 and 3.0 of the schedule to Clause 52.28 set out areas where gaming is prohibited. We note that the subject site does not sit within one of these prohibited areas (either a shopping complex or a nominated strip shopping centre).
74. Clause 4.0 provides criteria for the location of gaming machines whilst Clause 5.0 sets out criteria for venues for gaming machines. An assessment of the application against the policy is provided below.
75. We consider that the proposal has a high degree of compliance with Council's policy as follows:

Figure 6.1: Assessment against Clause 52.28

LOCATIONS FOR GAMING MACHINES	FYANSFORD HOTEL	BELL PARK SPORT & RECREATION CLUB
Gaming venues and machines <u>should</u> be located:		
Where they will contribute to a redistribution of gaming machines away from disadvantaged areas as defined by the SEIFA (Socio Economic Indicators for Areas) index of Relative Disadvantage.	<p>The suburb of Fyansford has a SEIFA score of 1107 which places it in the 10<sup>th</sup> decile and 99<sup>th</sup> percentile. The machines are proposed to be relocated from the Bell Park Sport &amp; Recreation Club which is located in Hamlyn Heights which has a SEIFA score of 1019 which sits in the 5<sup>th</sup> decile and 43<sup>rd</sup> percentile. This will result in a redistribution away from an area of greater disadvantage than the subject site.</p> <p>COMPLIES</p>	<p>The Bell Park Sport &amp; Recreation Club is located in the suburb of Hamlyn Heights which has a SEIFA score of 1019 and sits in the 5<sup>th</sup> decile and 43<sup>rd</sup> percentile.</p> <p>The removal of machines from this venue is a positive outcome.</p> <p>COMPLIES</p>
Where the community has a choice of non-gaming entertainment and recreation activities and established social infrastructure, some of which that operate during the times that the proposed gaming machines will operate in the local area.	<p>There are a number of local clubs, hotels and other facilities that provide entertainment and recreation facilities in the area surrounding Fyansford that are readily accessible to residents. This includes: Queens Park Golf Club, Geelong Cement Bowls Club, Western Heights Tennis Club and Provenance Restaurant at the old Fyansford Paper Mill.</p> <p>Additionally, there are a number of restaurants and cafes located in Shannon Avenue to the east as well as in central Geelong.</p>	<p>The Bell Park Sport &amp; Recreation Club is located within Hamlyn Park which includes a large oval, the Hamlyn Park Tennis Club and the Geelong Ballroom Dance Club.</p> <p>Other nearby entertainment and recreation facilities include: Geelong Golf Club, The Sphinx Hotel and the Manifold Heights Cricket Club.</p> <p>COMPLIES</p>



	<p>Further, I note that as an existing venue, the location has already been determined to be appropriate for gaming including by VCAT and there have been no material changes to the location since the original application for gaming premises approval in 2013.</p> <p>COMPLIES</p>	
Where the electronic gaming machine density of the locality and its catchment is equal to or below the overall municipal average.	<p>Whilst it is not common practice to calculate gaming machine density at a micro-level and is contradictory to planning policy which seeks to focus on appropriate locations for gaming machines<sup>2</sup>, I have undertaken a review of gaming machine density as it relates to this proposal.</p> <p>A review of density within the venue catchment<sup>3</sup> shows that the current density of machines in the local catchment is 8.40 EGMs per 1,000 adults (FY24/25). Greater Geelong has a gaming machine density of 5.75 EGMs per 1,000 adult.</p> <p>As this application involves a relocation of machines within the local catchment the density of EGMs will not change.</p> <p>DOES NOT COMPLY</p>	<p>Based on the same methodology, the current density of gaming machines within the local catchment for the Bell Park Sport &amp; Recreation Club is 5.14 EGMs per 1,000 adults.</p> <p>COMPLIES</p>

<sup>2</sup> I note the VCAT decision in relation to the Foundry Hotel in Bendigo where a local policy relating to the total density of gaming machines in a suburb was just one part of the policy requiring consideration and consequently, failure to comply with it was not a “knock-out” point. *Drayton Manor Pty Ltd v Greater Bendigo CC [2011] VCAT 628, para 29.*

<sup>3</sup> That is, the suburbs set out in Section 5.

Where the population is growing or expected to grow. In these areas gaming machines should not be established ahead of the provision of non-gambling entertainment, recreation activities and social infrastructure.	<p>Fyansford is a growing community and is expected to continue to grow. Council's population forecasts indicate an annual average growth rate of between 2.5% and 4.6% between 2026 and 2036 in the Herne Hill – Fyansford small area.</p> <p>COMPLIES</p>	<p>Hamlyn Heights is an established residential suburb with a very minor increase in population expected to occur between 2026 and 2036. The annual average growth rate for Hamlyn Heights sits between 0.06% and 0.61% for the same period.</p> <p>DOES NOT COMPLY</p>
Where socio-economic disadvantage is low, as defined by the SEIFA index of Relative Disadvantage.	<p>The hotel is located in the suburb of Fyansford which has a SEIFA score of 1107 and sits in the 10<sup>th</sup> decile for Victorian suburbs.</p> <p>By this indicator, the area around the venue can be categorised as being an area that experiences very low levels of socio-economic disadvantage.</p> <p>COMPLIES</p>	<p>The suburb of Hamlyn Heights has a SEIFA score of 1019 and sits in the 5<sup>th</sup> decile and 43<sup>rd</sup> percentile.</p> <p>COMPLIES</p>
Outside of areas identified for growth where the density of machines exceeds 10 gaming machines per 1,000 adults in the relevant postcode.	<p>The venue is located at the edge of an identified growth area. The current EGM density within the 3128 postcode is 6.29 EGMs per 1,000 adults. The application would result in an increased density of 8.67 EGMs per 1,000 adults which sits lower than the prescribed density.</p> <p>COMPLIES</p>	<p>Not applicable.</p>
At the periphery of the activity centres that serve more than a local catchment, outside of the main transport, shopping, community and civic functions of the centre.	<p>The Fyansford Hotel is located at the southwestern edge of the planned neighbourhood village in Fyansford. There has been no additional commercial development that occurred since the original approval of EGMs in this location. The</p>	<p>The Club is not located at the periphery of an activity centre and is surrounded by typical residential development.</p> <p>DOES NOT COMPLY</p>

	location has already been determined as being appropriate. COMPLIES	
On sites that minimise the likelihood of people passing the venue in the course of their usual business or every day activities.	The Fyansford Hotel is a destination venue that has little commercial activity surrounding it. The location of the proposed neighbourhood village is far enough removed from the Hotel to not create any convenience gambling opportunities. Further, as an existing venue, the risk to any future activity already exists and must be considered in approving any future uses. COMPLIES	The Bell Park Sport & Recreation Club is a destination venue that has no other commercial activity surrounding it. The venue is located proximate to Hamlyn Views School and Western Heights College. Removal of EGMs from this location is a positive outcome. COMPLIES
At a sports or recreation club with a land holding of more than 2 hectares.	Not applicable.	The Bell Park Sport & Recreation Club is located within Hamlyn Park which has land holdings in excess of 2 hectares. COMPLIES

## VENUES FOR GAMING MACHINES

Gaming machines should be located:

In venues that:

Promote non-gaming activities that increase net community benefit.	The proposal includes the provision of additional non-gaming facilities which will further promote these activities at the venue and provide a benefit to the local community. The proposed expanded	The Bell Park Sport & Recreation Club provides few alternative non-gaming activities. Whilst there is a small bistro/bar area which seats approximately 100 patrons, this is used irregularly. The Club is also equipped with a TAB and Keno facilities. More
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	<p>bistro will enhance the non-gaming offer at the venue.</p> <p>COMPLIES</p>	<p>broadly, the Club is located within Hamlyn Park which includes a sporting oval, tennis courts, bike pump track, playground and social facilities.</p> <p>DOES NOT COMPLY</p>
Offer social, entertainment or recreational opportunities other than gaming as the primary purpose of the venue	<p>Gaming has and will continue to have a small role in the venue with a modestly sized gaming room. Should the proposal be successful, the gaming room size will continue to be modest in size compared to the overall venue with a percentage of 21.4%.</p> <p>The Hotel will continue to offer a range of social, entertainment and recreational activities for patrons.</p> <p>COMPLIES</p>	<p>Whilst the primary purpose of the club is to provide a social facility for club members, it is currently underutilised for this purpose.</p> <p>DOES NOT COMPLY</p>
Have a range of entertainment and leisure options.	<p>As above.</p> <p>COMPLIES</p>	<p>As above.</p> <p>DOES NOT COMPLY</p>
Promote responsible gaming practices.	<p>The permit applicant and venue operator are committed to responsible gaming practices and ensure staff are well trained in the implementation of these practices. A RSG manual has been prepared by DNS Venue Services.</p> <p>COMPLIES</p>	<p>The Club operates under the Community Clubs Victoria Responsible Gambling Code of Conduct.</p> <p>COMPLIES</p>
Have gaming floor area of 25 per cent or less than the total floor area of the venue.	<p>Whilst the size of the gaming room is proposed to be increased as a result of this application, so too is</p>	<p>Gaming at this venue is often the only facility available and based upon my inspection, it appears</p>

	<p>the overall size of the non-gaming areas of the venue with the provision of an expanded bistro. Should the application be successful, the gaming room would comprise 20.7% of the total floor area of the venue.</p> <p>COMPLIES</p>	<p>that gaming comprises greater than 25% of the total floor area.</p>
Do not operate 24 hours-a-day.	<p>The hours of operation are not proposed to change as a result of this application. The venue is closed for a minimum of 8 hours a day, between 2am and 10am.</p> <p>COMPLIES</p>	<p>The Bell Park Sport &amp; Recreation Club is open from 11am daily with the maximum trading hours until 11.30pm on a Saturday only. This results in a minimum shut down period of 11.5 hours.</p> <p>COMPLIES</p>

76. Based on the above assessment, I consider that the Fyansford Hotel represents a better outcome for the location of gaming machines than the Bell Park Sport & Recreation Club as it has a higher level of compliance with the criteria set out above. Primarily, the Fyansford Hotel provides a broader range of non-gaming facilities, is located within an identified growth area and is in a location that experiences lower levels of socio-economic disadvantage.

### 6.3. City of Greater Geelong Gambling Harm Minimisation Policy

77. This policy was adopted by council in July 2022 and outlines Council's position on gambling. The policy focuses on preventing and reducing harm by promoting alternatives to gambling, evidence-based planning and community connection. It is underpinned by a harm minimisation framework that centres on supply reduction, demand reduction and harm reduction.
78. Policy statements are provided under the following priority areas which will guide Council's actions and decision-making for the life of the policy:
- Health and wellbeing
  - Council leadership
  - Partnerships and advocacy
79. Relevant to this application is the following policy statement:
- Assess applications for new and additional EGMs against a Social and Economic Impact Assessment (SEIA) guided by the Greater Geelong Gaming Policy Framework and taking into consideration community attitudes, feedback and/or concerns.
80. This report provides an independent Social and Economic Impact Assessment of the proposed increase of EGMs at the Fyansford Hotel.

### 6.4. City of Greater Geelong Council Plan 2025-29

81. The City of Greater Geelong adopted the Council Plan 2025-29 at its meeting on 22 July 2025. It outlines how Council will deliver meaningful outcomes through inclusive, sustainable and innovative local governance.
82. The Plan identifies the following six strategic objectives:
- **Core and critical infrastructure:** Plan, deliver, manage and optimise core and critical infrastructure across the region.
  - **Healthy and caring community:** Identify, promote, advocate for, and deliver equitable health and wellbeing outcomes for our diverse communities.
  - **Economic development:** Lead efforts to strengthen our diverse economy and workforce to enhance prosperity across our community.
  - **Heritage and culture:** Champion our unique heritage and culture.
  - **Environment and circular economy:** Protect and enhance our unique natural environment and surrounds.
  - **Governance and integrity:** Commit to the highest levels of leadership, integrity, financial stewardship, and meaningful community engagement.
83. There are no specific references to gaming or gambling within the Plan.

## 6.5. City of Greater Geelong Community Health and Wellbeing Strategy 2025-29

84. Council adopted the Community Health and Wellbeing Strategy 2025-29 at its meeting on 22 July 2025. The strategy sets the direction for how the City responds to community need and improves the health and wellbeing of residents.
85. There are six adopted Health and Wellbeing priorities as follows:
- Mental wellbeing and social inclusion.
  - Equitable access to safe, healthy, and sustainable food.
  - Physical activity and active living.
  - Gender equity and prevention of violence.
  - Climate change and health impacts.
  - Harm minimisation (tobacco, vaping, alcohol misuse and gambling).
86. Relevant to gambling, the strategy identifies the following:
- Losses to electronic gaming machines (EGMs) in Greater Geelong exceed \$100 million annually, which is one of the highest levels in Victoria.
  - Geelong has the highest losses in regional Victoria, with over double the number of losses in Ballarat or Bendigo and is within the top 5 Victorian local government areas with the highest annual losses.
87. Key strategic actions for harm minimisation (as it relates to gambling) include:
- *Increase community awareness of the harms associated with alcohol and tobacco use, vaping and gambling.*
  - *Actively support community or sporting clubs, groups, or organisations to divest themselves of Electronic Gaming Machines (EGMs).*

# 7. Gaming in Greater Geelong

## 7.1. VGCCC Statistics

88. As at 1 December 2025, there are 25 gaming venues operating within the City of Greater Geelong. The latest statistics from the VGCCC website (2024-2025 financial year) indicate that:
- Greater Geelong has a gaming machine density of 5.75 EGMs per 1000 adults which is higher than both the Country Victoria and State averages of 5.59 and 4.7 respectively.
  - Gaming expenditure (per adult) is \$601 which is higher than both the Country Victoria and State averages of \$523 (\$78 higher) and \$565 (\$36 higher) respectively.
  - Greater Geelong has a higher number of adults per venue (9,349) than the Country Victoria average (7,532) but lower number of adults per venue than the State-wide average (11,527).
89. The municipal gaming figures confirm that the level of gaming expenditure in Greater Geelong is higher than the Country Victoria average. However, this is typical of large regional centres that act as focal points for education and entertainment (amongst other services).
90. Regional centres throughout Victoria generally have significantly higher expenditure per adult due to their role as a regional catchment for a range of services for residents from a wider geographic region. The table below demonstrates that gaming expenditure in Greater Geelong is in the lower half of the spectrum of gaming expenditure in regional centres in Victoria, which is consistent with its comparison to the Country Victoria average.

Figure 7.1: EGM expenditure per adult for regional centres (2024-25)

Local Government Area (LGA)	Regional Centre	EGM expenditure per adult	% variation from Country Victoria average
Mildura	Mildura	\$889	+70.0%
Warrnambool	Warrnambool	\$839	+60.4%
Horsham	Horsham	\$822	+57.2%
Greater Shepparton	Shepparton	\$803	+53.5%
Latrobe	Traralgon	\$793	+51.6%
Ballarat	Ballarat	\$696	+33.1%



Ararat	Ararat	\$682	+30.4%
Greater Bendigo	Bendigo	\$613	+17.2%
Swan Hill	Swan Hill	\$605	+15.7%
Greater Geelong	Geelong	\$601	+14.9%
Benalla	Benalla	\$539	+3.1%
Country Victoria		\$523	-
Wangaratta	Wangaratta	\$449	-14.1%
Wodonga	Wodonga	\$317	-39.4%

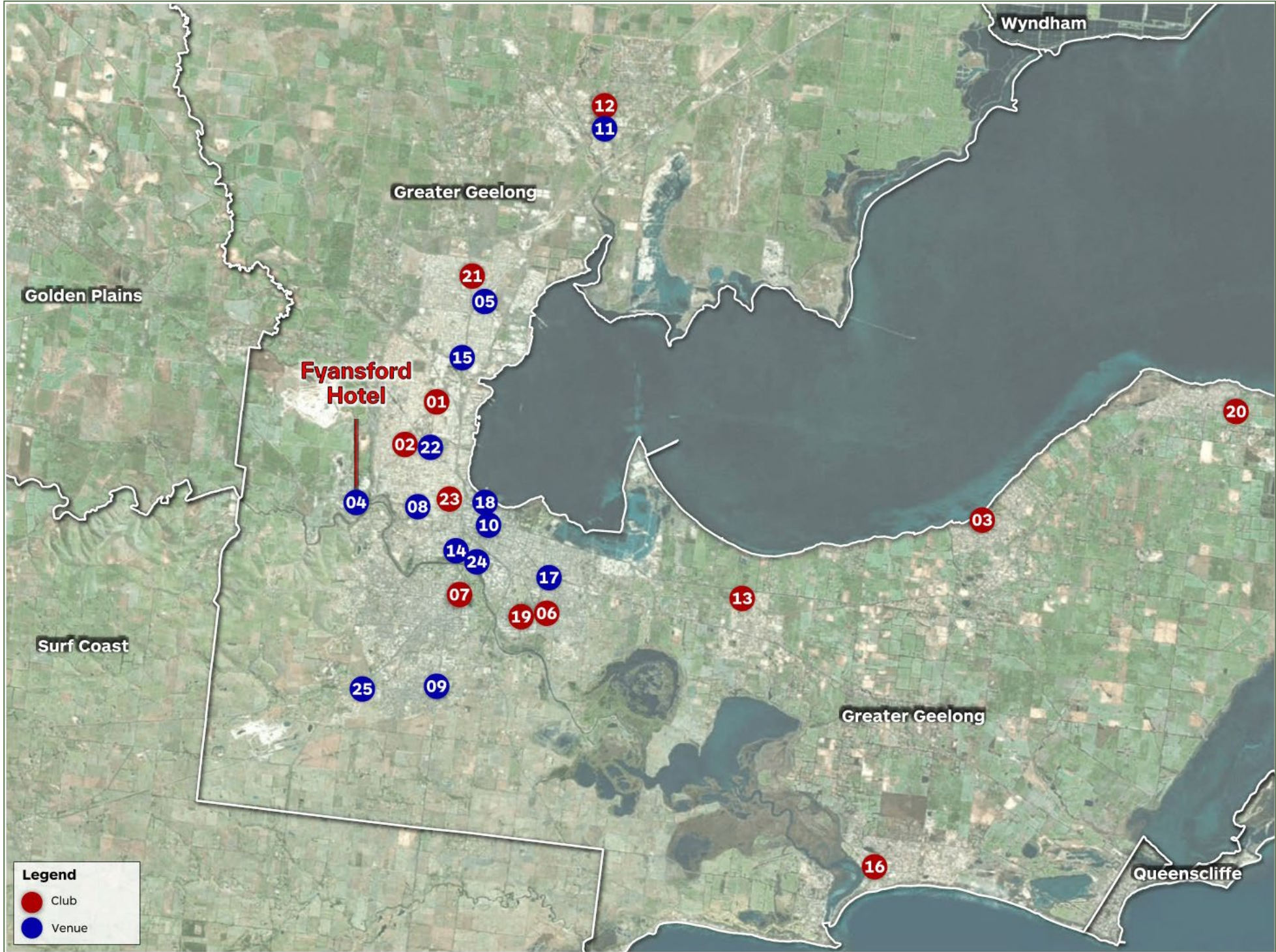
91. Expenditure data for each venue has been provided for the 2024-2025 financial year and is set out in Figure 7.2 over page.
92. The subject site is located approximately 2.7 kilometres<sup>4</sup> west of the closest gaming venue, the Great Western Hotel (36 EGMs), located at 177 Aberdeen Street, Newtown.
93. The total amount of gaming expenditure in the City of Greater Geelong for the 2024-2025 financial year was \$140,528,216.70.
94. The Net Machine Revenue (NMR) for the City of Greater Geelong is \$283.09 (July 2024 – June 2025).
95. The NMR for the Fyansford Hotel sits at \$227.39 compared to the Country Hotel and Metro Hotel averages of \$313.04 and \$431.05 respectively whilst the NMR for the Bell Park Sport & Recreation Club sits at \$54.10.
96. Of the 13 hotel venues operating within the City of Greater Geelong, the Fyansford Hotel has the third lowest NMR sitting well below the average NMR for all venues in the LGA.

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<sup>4</sup> Via road, calculated with Google Maps



Figure 7.2: Map of gaming venues in the City of Greater Geelong



#	Venue	Attached EGMs	NMR	#	Venue	Attached EGMs	NMR	#	Venue	Attached EGMs	NMR
01	Australian Croatian National Hall	30	\$293.01	08	Great Western Hotel	36	\$310.55	18	Phoenix Hotel	28	\$278.13
02	Bell Park Sport & Recreation Club	28	\$54.10	09	Grovedale Hotel	80	\$405.54	19	Polish Community Association Geelong	35	\$128.80
03	Clifton Springs Golf Club	50	\$292.70	10	Jokers on Ryie	47	\$260.05	20	Portarlington Golf Club	65	\$287.21
04	<b>Fyansford Hotel</b>	<b>39</b>	<b>\$227.39</b>	11	Lara Hotel	40	\$195.88	21	Shell Club	77	\$349.47
05	Gateway Hotel	50	\$348.62	12	Lara Sporting Club	50	\$153.36	22	Sphinx Entertainment Centre	67	\$426.79
06	Geelong Combined League Club	105	\$274.16	13	Leopold Sportsmans Club	42	\$318.19	23	St George Workers Club	35	\$256.45
07	Geelong RSL	72	\$241.54	14	Lord of the Isles Tavern	60	\$308.98	24	Valley Inn Hotel	29	\$252.04
				15	Norlane Hotel	84	\$297.15	25	Waurm Ponds Hotel	81	\$296.81
				16	Ocean Grove Bowling Club	60	\$222.06		<b>Total</b>	<b>1345</b>	
				17	Peninsula Hotel Motel	55	\$350.22				

Source: VGCCC prepared by Ratio Consultants

## 7.2. Regional Caps

97. On 10 September 2012, the then VCGLR re-determined the maximum permissible number of gaming machine entitlements available for gaming in each capped region. These caps were further revised by the Minister for Consumer Affairs, Gaming and Liquor Regulation on 20 September 2017, with the changes coming into effect from 3 November 2017. There are now 25 capped regions in Victoria. The City of Greater Geelong is located within a capped region.
98. Accordingly, the maximum number of machines permitted in the City of Greater Geelong (and the Borough of Queenscliffe) is 1,421. There are currently 1390 EGMs operating within the City of Greater Geelong and the Borough of Queenscliffe.
99. As the proposal includes the relocation of existing machines there is no change to the number of EGMS operating within the municipality, however, it will result in the closure of one gaming venue.

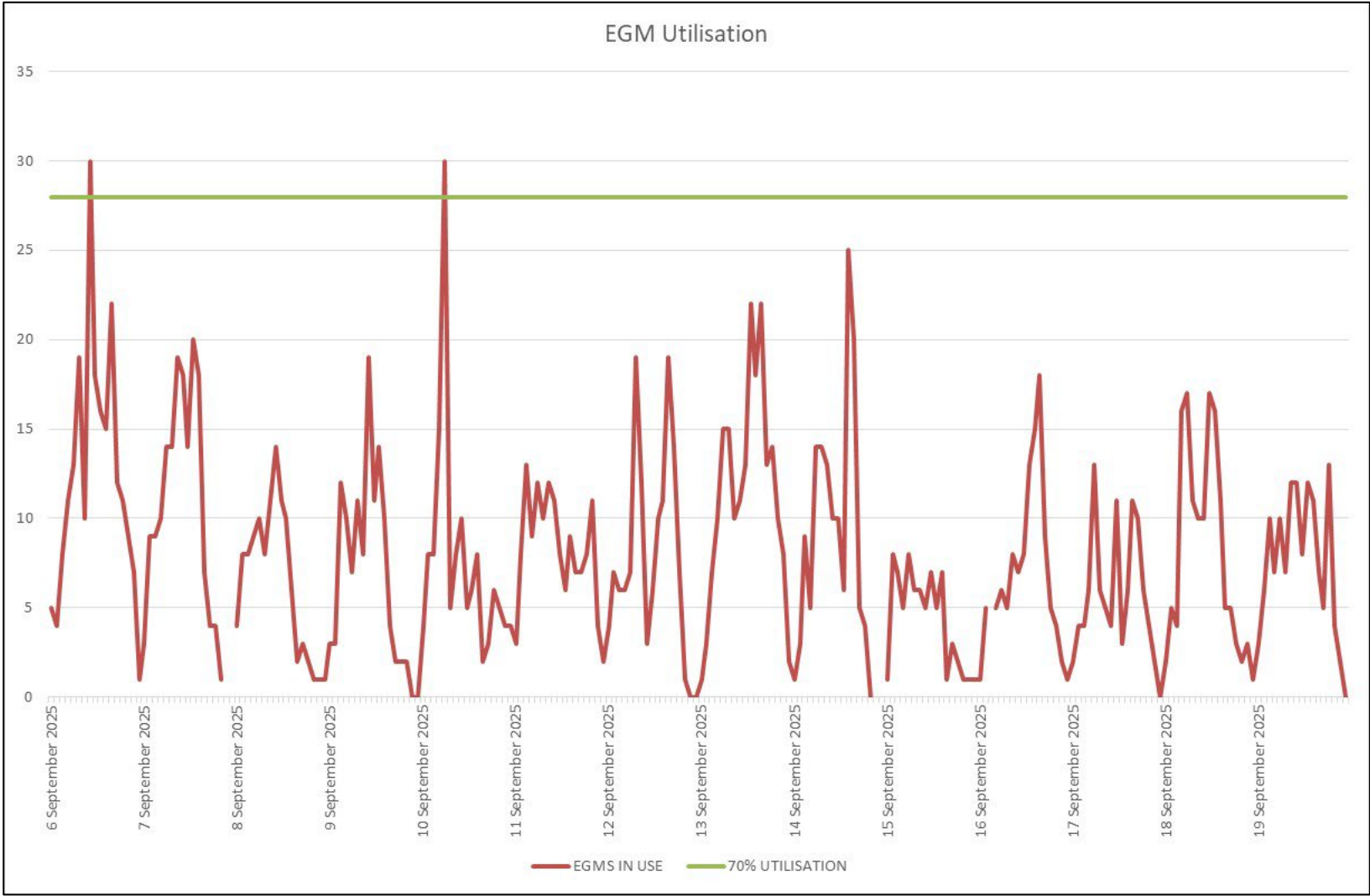


# 8. Gaming at the Fyansford Hotel

## 8.1. EGM Utilisation

100. In order to determine peak EGM utilisation, head count surveys were conducted hourly in the gaming room and collated daily over a survey period of two weeks. The survey was undertaken between 6 September 2025 and 19 September 2025 (inclusive) and the result of the survey are included in Figure 8.1 over page.
101. The results indicate that the gaming room is operating at peak utilisation (i.e. greater than 70% or 28 EGMs) for approximately one hour per week (approximately two hours over the two-week period), which is indicative of low demand for gaming at the venue.
102. The highest utilisation recorded was 30 machines (77% utilisation) which was recorded at 5pm on Saturday 6 September and at 2pm On Wednesday 10 September. The relatively low level of utilisation combined with the modest NMR at the venue (\$227) is an indication that problem gambling is unlikely to be a significant issue at this venue.

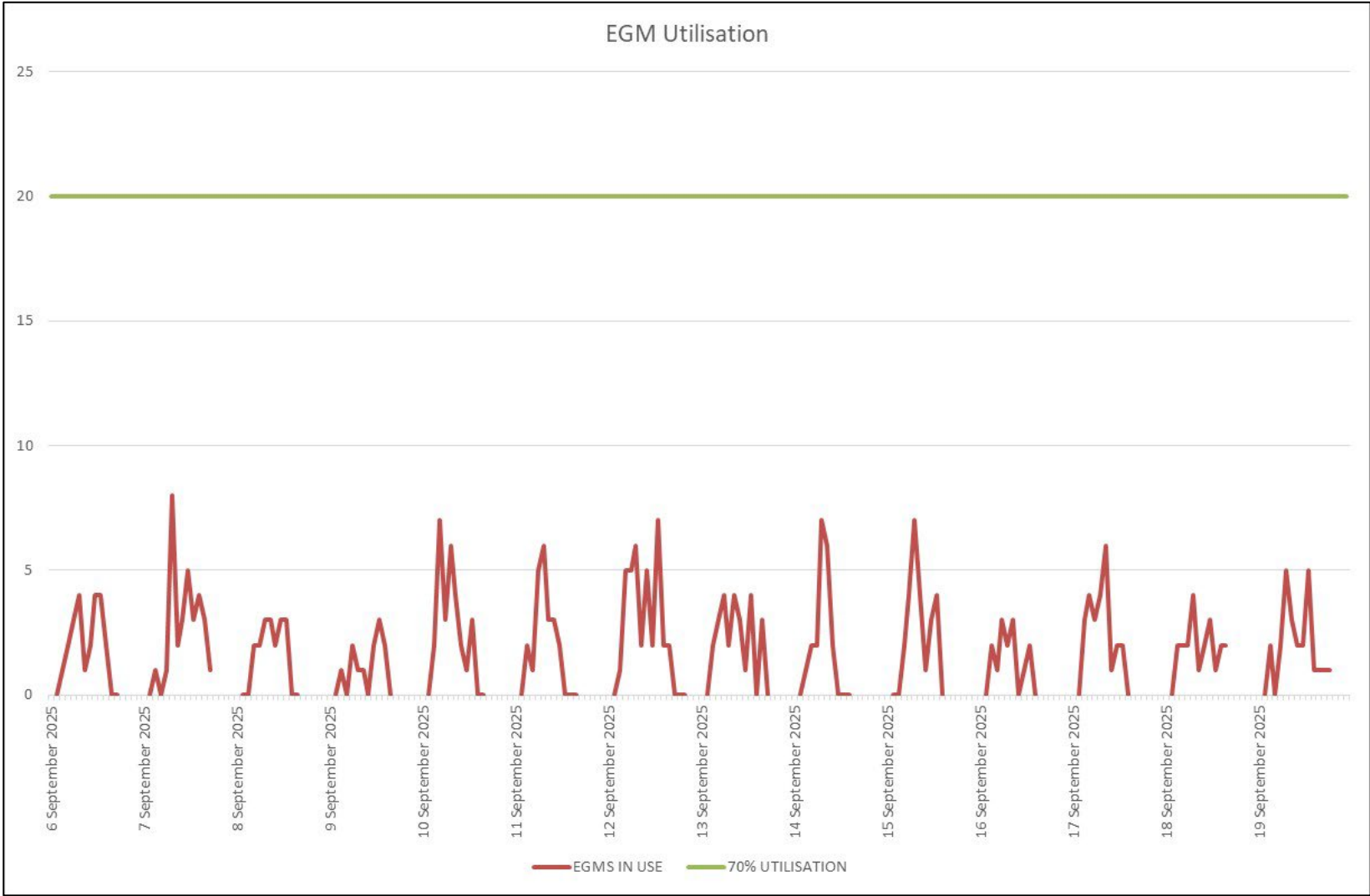
Figure 8.1: EGM utilisation survey results – September 2025 – Fyansford Hotel



## 8.2. Gaming at the Bell Park Sport & Recreation Club

103. Given the application involves the relocation of machines from the Bell Park Sport & Recreation Club, the applicant also undertook EGM utilisation surveys over the same period between 6 September 2025 and 19 September 2025 (inclusive).
104. The results indicate that the gaming room at the Bell Park Sport & Recreation Club did not operate at peak utilisation (i.e. greater than 70% or 20 EGMs) at any time during the survey period, which is indicative of low demand for gaming at this venue also.
105. The highest utilisation recorded was 8 machines (29% utilisation) which was recorded on one occasion at 3pm on Sunday 7 September 2025 as illustrated in Figure 8.2 over page.

Figure 8.2: EGM utilisation survey results – September 2025 – Bell Park Sports & Recreation Club



# 9. Social and Economic Profile of the Study Area

## 9.1. Introduction / Overview

106. Consistent with the findings of the patron survey set out in Section 5 of this report, we have reviewed the patron catchment of the Hotel, being those areas which comprise more than 5% of patrons in the patron survey. I note that the patron catchment is generally located within 2.5km – 5km of the Hotel. Given the patron surveys of the Bell Park Sport & Recreation Club included representation of suburbs also found in the patron surveys of the Hotel, those suburbs that are represented in the patron catchment of both venues has been used for the purposes of the following assessment. This includes the following suburbs: Bannockburn, Fyansford, Hamlyn Heights, Corio, Bell Post Hill and Newtown.
107. To determine the social/economic profile of the patron catchment, a range of information has been used from the Australian Bureau of Statistics (ABS), the City of Greater Geelong and other publicly available information.
108. The ABS Census data is analysed at the Regional (Rest of Victoria Capital City Statistical Area), municipal (Local Government Area) and at a local level (suburb).



Figure 9.1: Patron catchment map



109. The profiles of the suburbs comprising the patron catchment have been compared with the Rest of Victoria Capital City Statistical Area, which is effectively Country Victoria. This analysis uses the ABS Census data from 2021.

## 9.2. Population and Population Growth

110. In 2021, the City of Greater Geelong had a population of 271,057<sup>5</sup> which is projected to increase by 11.2% to 301,370 by 2026 and by 23.4% to 334,580 by 2031<sup>6</sup>.
111. Information on the projected annual average rate of population growth for 2026 and 2031 is available from the Department of Environment, Land, Water and Planning at the LGA level and the Victoria in Future Small Areas (VIFSA's) based on the estimated resident population at 30 June 2022 as the base population and is provided at Figure 9.2 over page.

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<sup>5</sup> ABS Census, 2021

<sup>6</sup> DELWP, VIF 2023. NB. The estimated resident population as at 30 June 2021 was 270,770 which is slightly lower than the 2021 Census data.

**Figure 9.2: Estimated population growth in Greater Geelong**

Geographic Area	Estimated average annual population growth rate		
	2021-2026	2026-2031	2031-2036
City of Greater Geelong	2.2%	2.1%	1.9%
Regional Victoria	1.2%	1.3%	1.2%

112. We have reviewed the population forecasts prepared for the City of Greater Geelong by i.d. consulting for the small areas that form the patron catchment. This analysis shows the expected population growth of the patron catchment around the venue.

**Figure 9.3: Estimated population growth in patron catchment**

Small area	Estimated residential population				Change between 2021 and 2036
	2021	2026	2031	2036	
Herne Hill - Fyansford	4,665	5,286	6,346	7,957	+70.6%
Hamlyn Heights	6,531	6,552	6,686	6,893	+5.5%
Geelong West – Manifold Heights	10,045	10,190	10,622	13,247	+31.9%
Newtown	10,406	10,407	11,170	12,324	+18.4%
Highton – Wandana Heights - Ceres	23,504	25,904	26,212	26,788	+14.0%

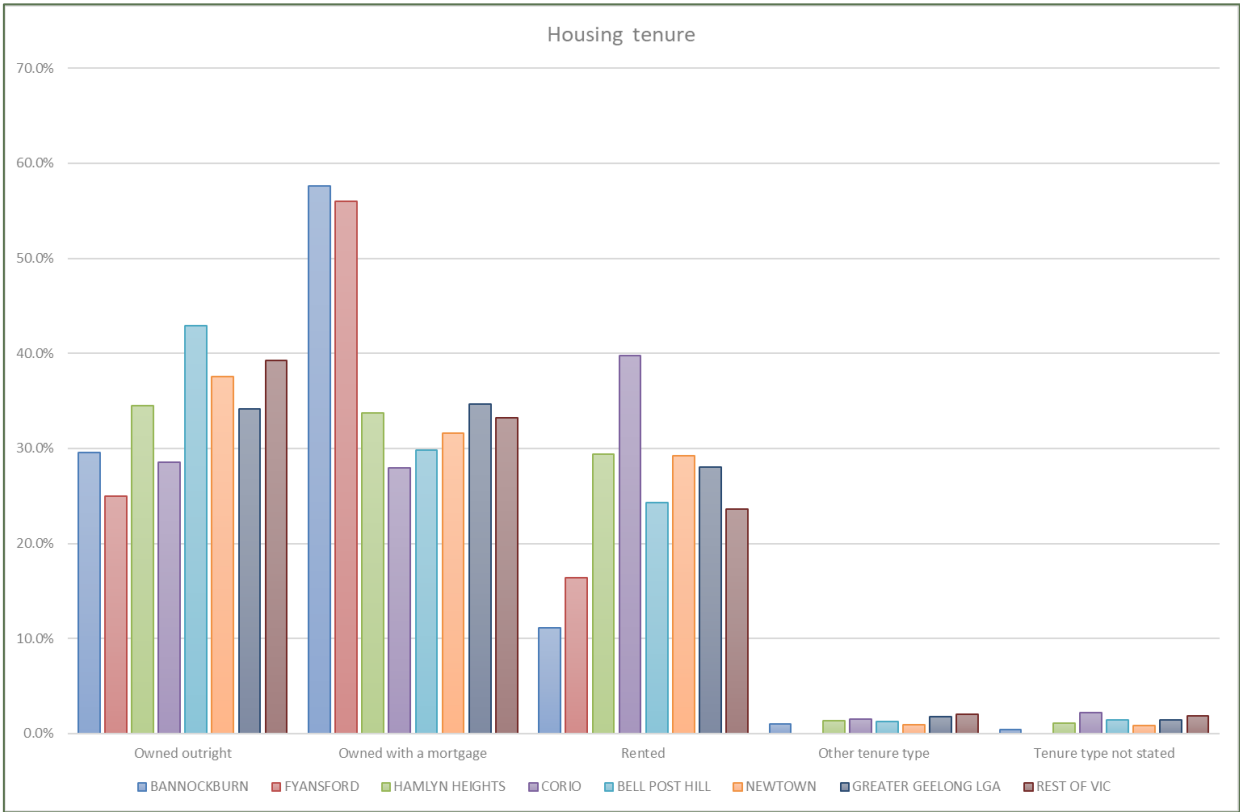
113. Whilst there is modest population growth forecast for the venue catchment, it is not a significant factor in the assessment of the social and economic impact of this proposal.

### 9.3. Summary of Social and Economic Indices

114. A summary of the social and economic profile of the patron catchment is presented in the figures below. This analysis has been prepared based on the well-established parameters of social disadvantage.

HOME OWNERSHIP

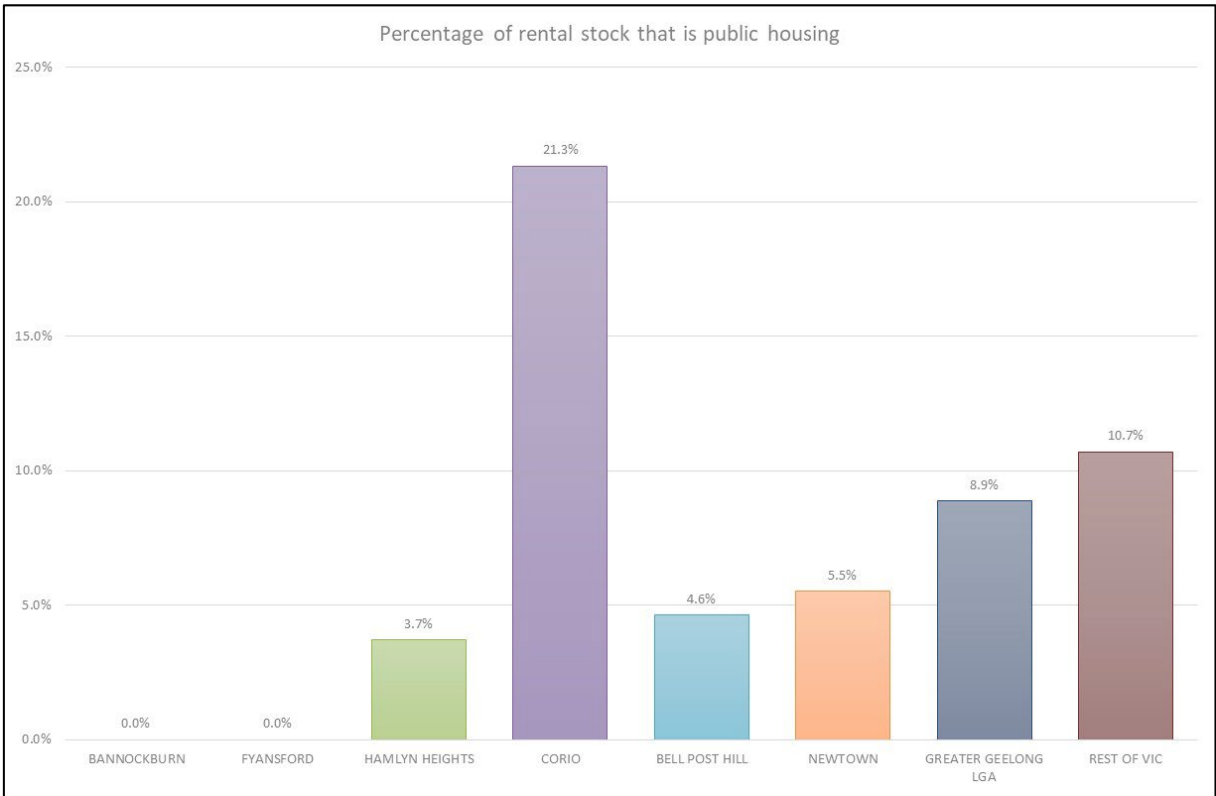
Figure 9.4: Tenure graph



115. There are generally lower levels of home ownership in the patron catchment compared to the Country Victoria average, with the exception of Bell Post Hill. The proportion of homes being purchased with a mortgage is similar to the Country Victoria average, the exceptions being in Fyansford and Bannockburn which sit significantly higher and in Corio which sits below the Country Victoria average. There are generally higher proportions of renting in the patron catchment when compared to the Country Victoria average, with the exceptions being Fyansford and Bannockburn.

PUBLIC HOUSING

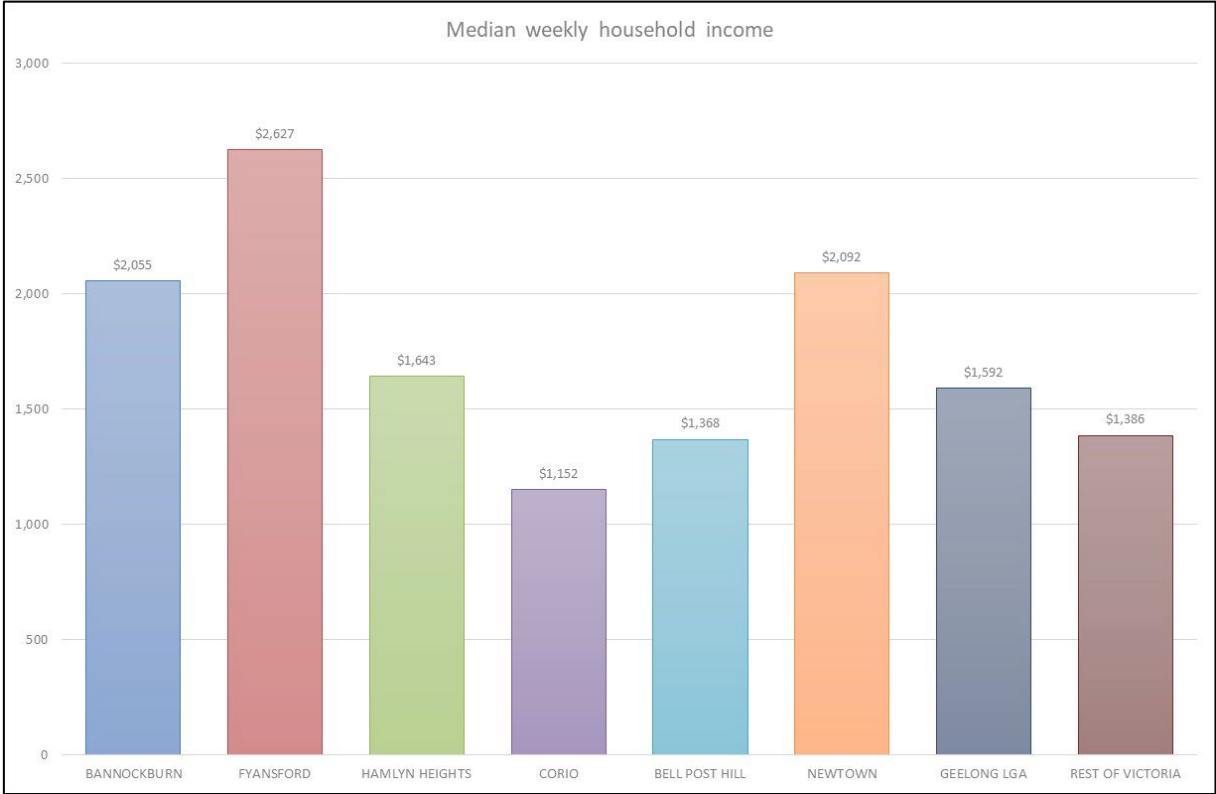
Figure 9.5: Proportion of public housing



116. There are generally lower levels of public housing in the patron catchment compared to the Greater Geelong LGA and Country Victoria averages. The exception is Corio which has a significantly higher than average proportion of public housing compared to both the LGA and Country Victoria averages.

MEDIAN WEEKLY HOUSEHOLD INCOME

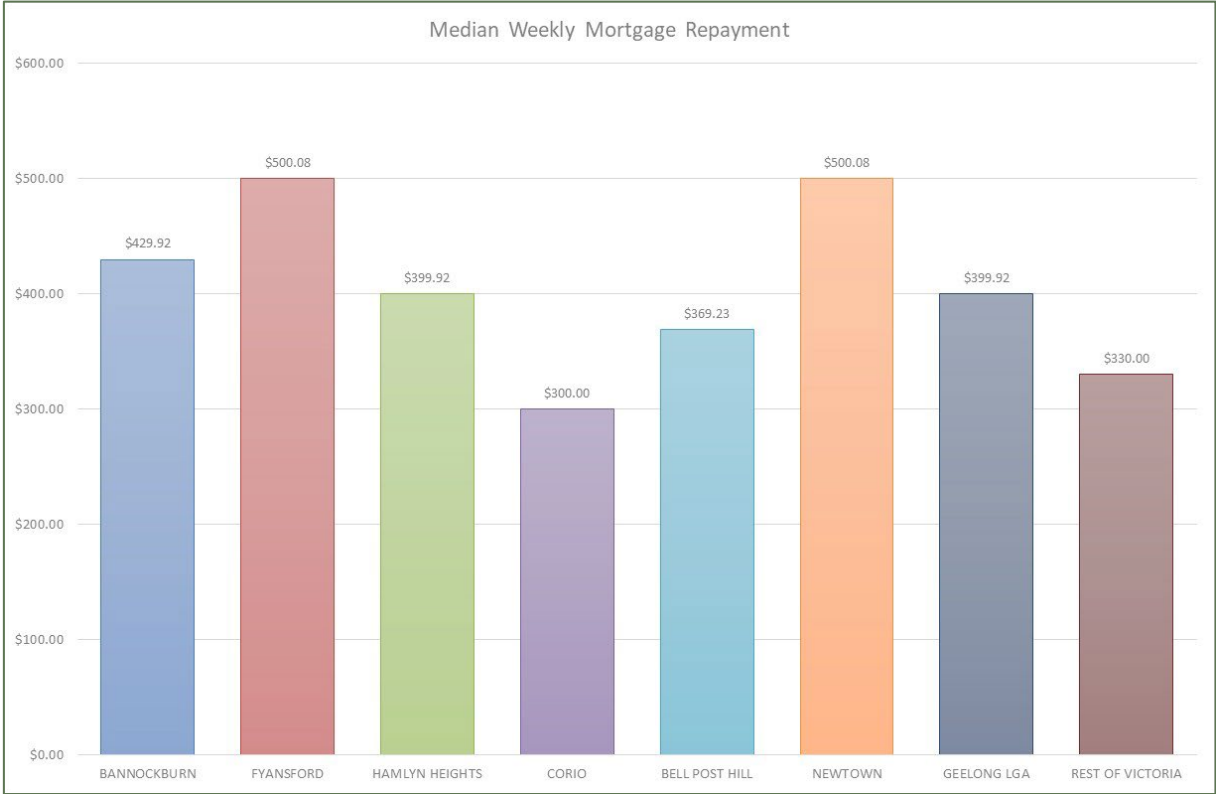
Figure 9.6: Median weekly household income



117. The patron catchment generally experiences higher median weekly household incomes compared to the Country Victoria average. The exception is Corio which has lower median weekly household incomes when compared to the LGA and Country averages.

MORTGAGE PAYMENTS

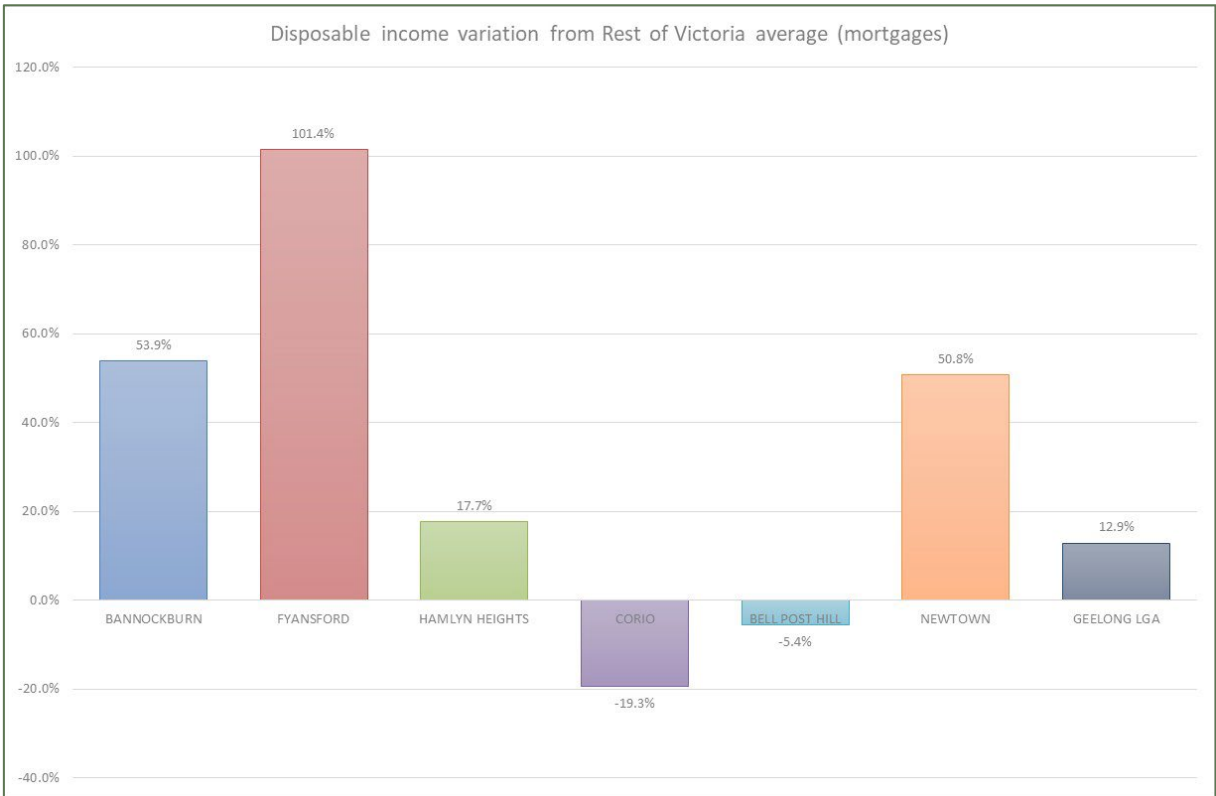
Figure 9.7: Median weekly mortgage repayments



118. The patron catchment experiences higher median weekly mortgage repayments when compared to the Country Victoria average, the exception being Corio which has below average weekly mortgage payments. When compared to the Geelong LGA, the patron catchment experiences both above and below the average for median weekly mortgage repayments.

DISPOSABLE INCOME

Figure 9.8: Disposable income differential (mortgages)

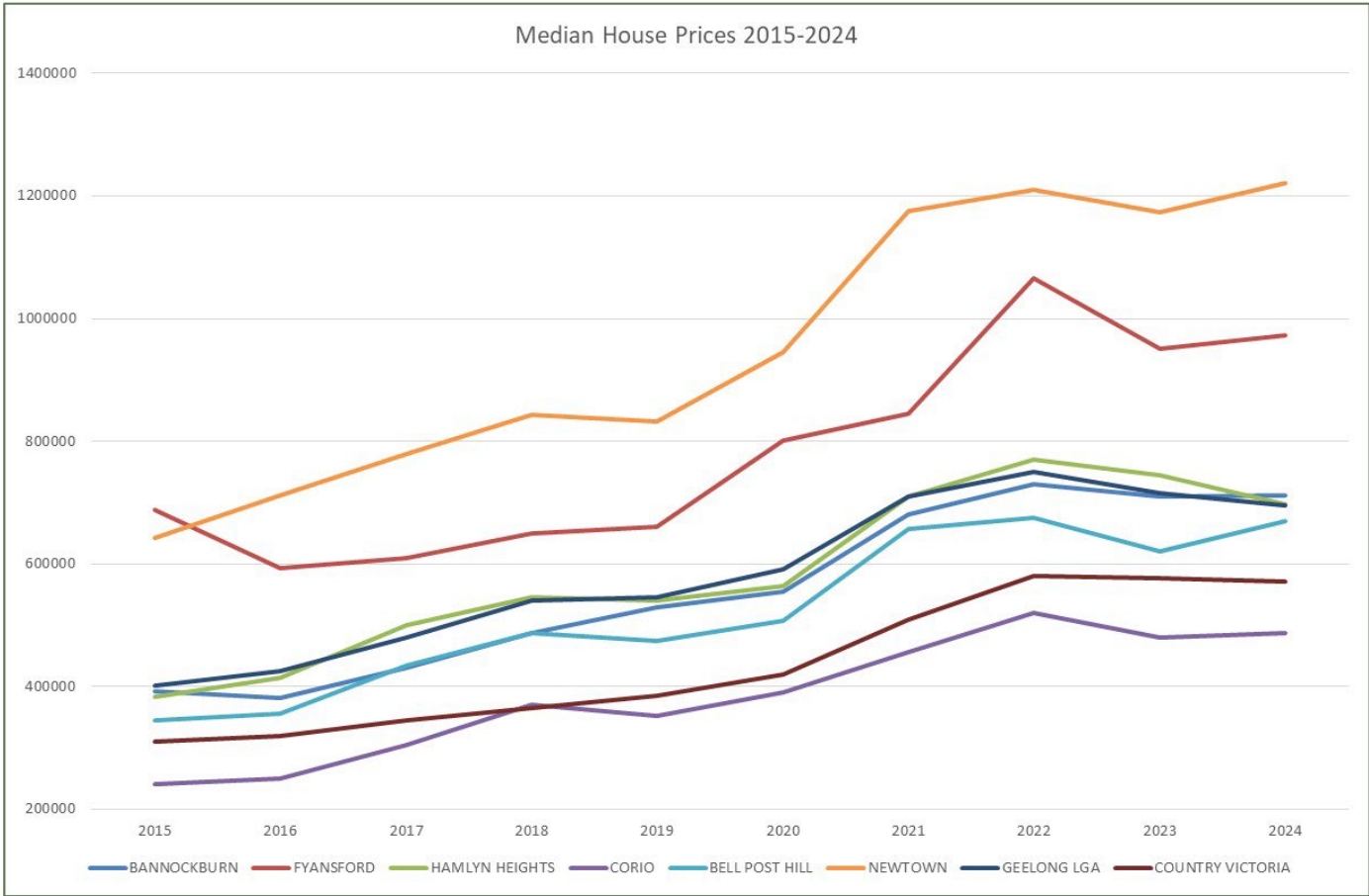


119. The patron catchment generally has higher levels of disposable income compared to the Country Victoria average, the outliers being Corio which has substantially below average disposable income (Bell Post Hill sits just below the Country Victoria average) and Fyansford which has substantially above average disposable income.



HOUSING PRICES

Figure 9.9: Median house prices 2015-2024



120. Median house prices in the patron catchment sit well above the Country Victoria average with the exception of Corio which sits below. When compared to the Greater Geelong LGA average house price, the patron catchment has averages both above and below. Fyansford and Newtown have the highest average house prices, sitting significantly above the LGA average.



## 9.4. Housing Stress

121. As detailed in the National Summit on Housing Affordability in 2004, households should be regarded as suffering housing stress if their housing costs exceed 30% of their income and they are in the bottom 40% of income distribution i.e. consideration should be given to income sizes in assessing mortgage stress, as households with higher incomes are better placed to 'afford' housing stress.
122. For example, a 'high income' household paying 30% of its income on housing and earning \$150,000 p.a. would have up to \$105,000 (before tax) remaining for other household expenses. However, a 'low income' family paying 30% of its income on housing and, earning \$50,000 p.a. has only up to \$35,000 remaining (before tax).
123. The 2021 Census has changed the way in which this data is calculated. Applicable households included in the calculation for each category have changed. The mortgage payments variable includes only occupied private dwellings owned with a mortgage or purchased under a shared equity scheme and the rental payments variable includes only occupied private dwellings being rented. Accordingly, these figures cannot be directly compared to earlier Census figures.
124. The 2021 Census has provided figures for households spending more than 30% of their income on both rent and mortgages. These figures are provided in the table below comparing the suburb where the venue sits (i.e. Fyansford) with patron catchment suburbs, the LGA, Rest of Victoria (Country average) and Victoria.

Figure 9.10: Housing stress 2021

Geographic Area	Households where mortgage payments are 30% or greater of household income	Households where rental payments are 30% or greater of household income
Greater Geelong LGA	11.4%	32.2%
Bannockburn	10.1%	35.1%
<b>Fyansford</b>	<b>9.9%</b>	<b>19.7%</b>
Hamlyn Heights	9.7%	30.4%
Corio	14.1%	32.3%
Bell Post Hil	9.47	31.72
Newtown	11.31	27.83
Rest of Victoria	11.2%	30.8%

VICTORIA	15.5%	30.9%
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125. The data shows that the patron catchment experiences both above and below average levels of housing stress for mortgages when compared to the Country Victoria average. All suburbs within the patron catchment experience below average levels of housing stress when compared to the State average (for mortgages).
126. In relation to rental payments, the patron catchment experiences both above and below average levels of housing stress compared to the Country Victoria and State averages. Fyansford (where the venue is located) has significantly lower levels of housing stress for rental payments compared to the LGA, Country Victoria and State averages.

## 9.5. Unemployment

127. Unemployment within the Greater Geelong LGA sits above the Country Victoria average and slightly below the State average (3.8% and 4.5% respectively) September 2025 Quarter Small Area Labour Markets) with an unemployment rate of 4.4%<sup>7</sup>.
128. Unemployment in the Geelong West – Hamlyn Heights SA2, where the venue is located, sits at 3.4% for the same period, which is below the LGA, Country Victoria and State averages as set out above.
129. Given that a 2.5km radius from the venue includes a number of SA2 areas, we have reviewed the data for these geographic regions to determine the likely rate of unemployment within the catchment of the venue. This analysis shows the following:
- Highton SA2 2.2%
  - Newtown SA2 1.9%
130. Using the raw figures of unemployed persons and total persons in the labour force, the patron catchment (which includes the two SA2s above and the Geelong West – Hamlyn Heights SA2) has an overall unemployment rate (for the September 2025 quarter) of 2.6%, which is well below the LGA, Country Victoria and State averages.

<sup>7</sup> LGA unemployment data taken from Small Area Labour Markets data available from the Department of Employment and Workplace Relations. This data is the smoothed unemployment data over a 12 month period. Data for the Country Victoria (Rest of Victoria) and State averages has been obtained from Labour Force, Australia, Detailed data from the ABS. Comparable figures for the September 2025 quarter have been provided by averaging the 12 months prior.

# 10. SEIFA Analysis

131. A review of the SEIFA results for the venue catchment enables an understanding of the social and economic profile of the patron catchment.
132. The SEIFA Index scores as relevant to the consideration of an application for the installation of 28 additional EGMs at the Fyansford Hotel are set out in the following tables, noting that indexes between differing geographic areas (i.e. – the LGA and suburbs) cannot be directly compared.
133. The 2021 SEIFA results, like previous years, do not include averages for differing geographic areas, however, from viewing the percentiles, the median for all Victorian LGAs is 1003 and for Victorian suburbs is 1029. The disparity between the medians for suburbs and local government areas reinforces that the SEIFA Index scores cannot be compared between differing geographical regions.
134. The most appropriate ways in which to compare different geographies using the SEIFA Index is to use the percentile rankings of each area in question.
135. The SEIFA Index of Disadvantage contains a spread of scores that range from 143 to 1207 with the median score for SA1s in Australia of 1000. The mathematical distribution of scores has a long left tail, meaning that the scores for disadvantage are more spread out than the scores of less disadvantaged areas. This is a consequence of the Index containing only disadvantage indicators, so there is more scope to distinguish between disadvantaged areas and advantaged areas<sup>8</sup>.

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<sup>8</sup> *Socio-Economic Indexes for Areas (SEIFA) – Technical Paper 2021*, Australian Bureau of Statistics.

Figure 10.1: Index of Relative Disadvantage Score Distribution

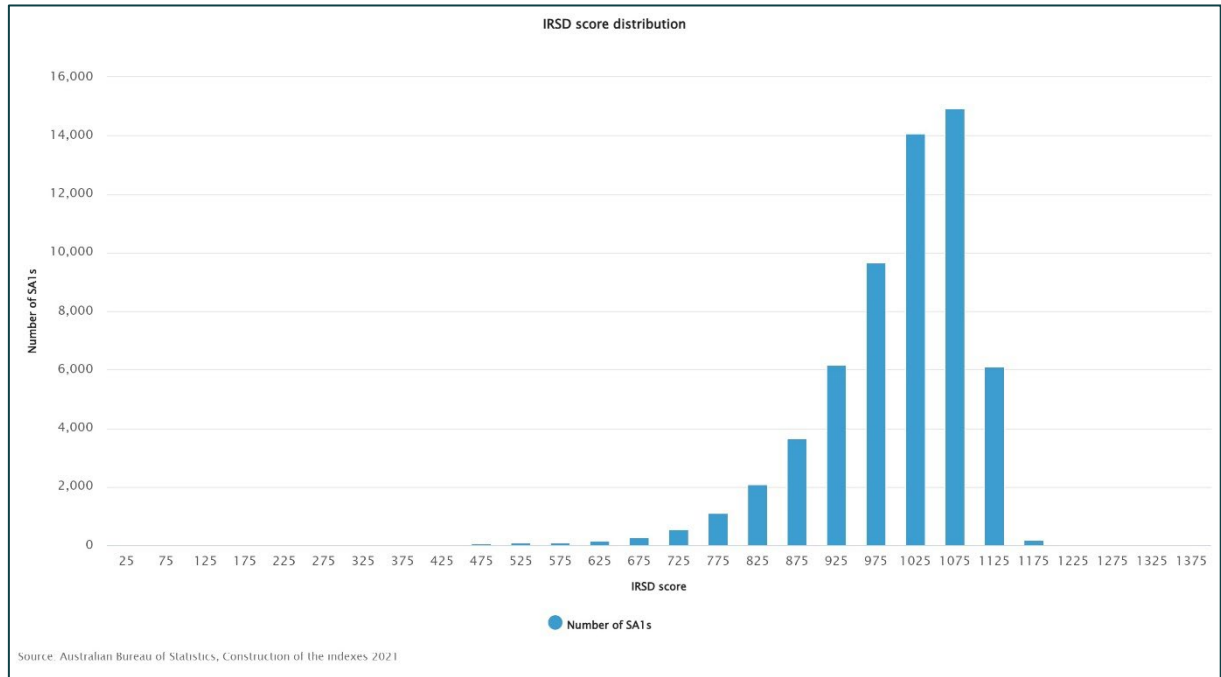


Figure 10.2: SEIFA Index of Disadvantage – Local Government Areas

Local Government Area	SEIFA 2021	Decile	Percentile
Greater Geelong LGA	1007	6	57
Regional Vic Median LGA	986	-	-
<b>Median LGA</b>	<b>1003</b>	-	-

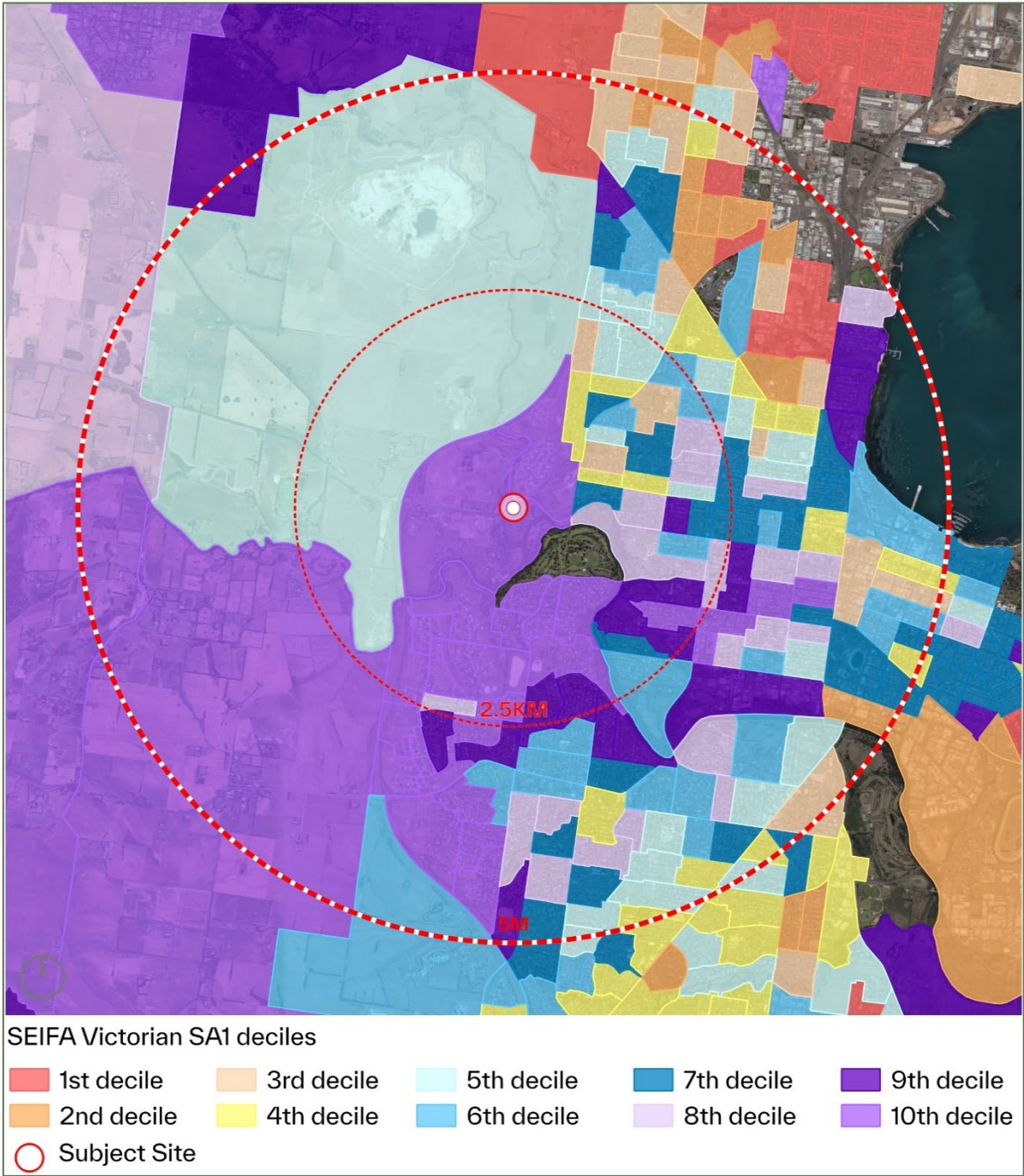
Source: ABS 2021 [www.abs.gov.au](http://www.abs.gov.au)

Figure 10.3: SEIFA Index of Disadvantage – Suburbs (based on patron surveys)

Suburb	SEIFA 2021	Decile	Percentile
Bannockburn	1047	7	65
Fyansford	1107	10	99
Hamlyn Heights	1019	5	43
Corio	823	1	1
Bell Post Hil	972	2	20
Newtown	1073	9	85
<b>Median suburb area</b>	<b>1029</b>	-	-

136. Based on this 2021 data, I confirm that:
- The SEIFA Index for the Greater Geelong LGA (1007) sits above the median for Regional Victorian LGAs (986) as well as all Victorian LGAs (1003).
  - The suburb where the venue is located (Fyansford) sits in the 99th percentile, with the EGMs being transferred from a suburb (Hamlyn Heights) that sits in the 43rd percentile.
  - The suburbs that comprise the patron catchment of the venue (based on the patron surveys), have SEIFA scores both above and below the median SEIFA score for all Victorian suburbs.
137. The map on the following page shows Statistical Area 1 (SA1s) in a 2.5 - 5 kilometre radius of the venue at a decile ranking for Victoria. This shows that the venue sits in an SA1 that is in the 10th decile. A large portion of the area within a 2.5km radius of the venue sits within the 7th decile or above. The exception is the area to the northwest and west on the other side of the Geelong Ring Road which sits in the 5th decile. We note that this area is largely undeveloped farmland.
138. There are some SA1s that have SEIFA scores in the bottom 20 per cent located within a 5km radius of the venue, however, we note that these are located much closer to other gaming venues such as Sphinx Entertainment Centre, Australian Croatian National Hall and Norlane Hotel. Residents in these areas would be making a conscious decision to come to the venue and have to pass these other venues to attend the Fyansford Hotel.

Figure 10.4: SEIFA Map by SA1 (5km radius)



Source: QGIS, ABS SEIFA data, prepared by Ratio Consultants



# 11. VGCCC Harm Minimisation

## 11.1. Position Statement on Harm Minimisation

139. The VGCCC released their Position Statement on Harm Minimisation in June 2023. It sets out the following seven position statements:
- Our harm minimisation objective guides all our regulatory decisions, actions and expectations.
  - Gambling causes harm.
  - Recovery from harm does not alter the causal role played by gambling.
  - Harm is preventable.
  - Gambling markets gravitate toward harmful offerings.
  - Gambling regulation seeks to prevent harm.
  - Gambling providers have a duty to care for the wellbeing of their customers and their communities.
140. The above position statement outlines the Commissions expectations and the industry's responsibilities. It seeks to place obligations on operators to minimise harm from gambling.
141. This is consistent with a growing understand that a public health approach is required and that rather than seeking to reduce rates of problem gambling, there should be greater focus on reducing community level harm<sup>9</sup>.

## 11.2. Harm Minimisation Strategy

142. Following the release of the Position Statement, the VGCCC endorsed the VGCCC Harm Minimisation Strategy. It applies to all aspects of the Commission's activities including licensing and approvals, education, monitoring and enforcement.
143. Specific to this application, under licensing and other approvals, the strategy provides the following regulatory approach:
- Reshaping our decision-making frameworks to prioritise harm prevention. These revised frameworks will apply to all approvals.
  - Applicants will be obliged to demonstrate their commitment to actively safeguarding customers through their compliance with harm minimisation objectives.
144. Based on this new regulatory framework, we have undertaken a review of the risk profile of all gamblers in the following section.

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<sup>9</sup> Victorian Population Gambling and Health Study 2018-19, VRGF, March 2020, p4.

# 12. Victorian Population Gambling and Health Study 2018-2019

## 12.1. Introduction

145. Released in March 2020, this study is an extension of previous research undertaken by the Victorian Responsible Gambling Foundation (VRGF) in 2008 and 2014. The result of a large general population survey on gambling participation and gambling problems, the study seeks to better reflect the emerging trend to explore gambling behaviour as a public health issue, including within the community at large.
146. Given the nature of this study, which builds upon previous work undertaken by the VRGF and it being specific to Victoria, it is relevant to consider the findings of this study in the context of the application to increase the number of gaming machines at the Fyansford Hotel by 28 EGMs.
147. We have reviewed the report as it relates to not only problem gamblers but to low risk and moderate risk gamblers as well.
148. For ease of reference, the definition of gambling risk is as follows:

**Problem gamblers** are defined as those who have experienced adverse consequences as a result of their gambling and who may have lost control of their gambling behaviour. Involvement in gambling may be at any level but is likely to be heavy. Problem gamblers have scores of 8 or more on the PGSI.

**Moderate risk gamblers** are those who may have responded 'never' to most of the indicators of behavioural problems in the PGSI, but who are likely to score on one or more 'most of the time' or 'almost always' responses. This group may or may not have experienced significant adverse consequences from gambling. Moderate risk gamblers have scores of 3 to 7 on the PGSI.

**Low risk gamblers** are likely to have experienced only minor adverse consequences from gambling, if any, and will have answered 'never' to most (but not all) of the indicators of behavioural problems in the PGSI. Low risk gamblers have scores of 1 or 2 on the PGSI.

**Non-problem gamblers** are those who have responded 'never' to all of the indicators of behavioural problems (that is, who score 0 on the PGSI). Members of this group may or may not be frequent gamblers with heavy involvement in gambling in terms of time and money, but they will be unlikely to have experienced severe adverse consequences<sup>10</sup>.

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<sup>10</sup> Social Research Centre. (2013). 2012 South Australian Gambling Prevalence Study. Retrieved from Department for Communities and Social Inclusion and the Independent Gambling Authority website: <https://problemgambling>.

149. Consistent with previous research, the study found that more than two thirds (69%) of adults in Victoria participated in some form of gambling in the past 12 months and that, unsurprisingly, the internet continues to grow in popularity as a platform for gambling, particularly with online race and sports betting.
150. Gambling participation is highest for older persons aged 65-74 (78%) and lowest amongst younger people 18-24 (52.4%). This is explained in part due to the advancing age of the community generally. Gaming participation also increased reliably with income with 78.9% of persons earning more than \$156,000 having gambled in the previous 12 months, compared with 57.3% for those earning less than \$20,799.
151. Of significance is that whilst participation in gambling increases with income, moderate to problem gambling risk declines. It is presumed that this contrast reflects the fact that gambling is more affordable for affluent people.
152. Consistent with previous research, the study found that whilst problem gambling only affects a very small percentage of the population (0.7%), the impacts are felt by a much broader spread of the community given the impacts on low risk or moderate risk gamblers. Whilst low risk gamblers experience far fewer individual harms from their gambling, as a group they contribute to the largest amount of harm at around 50%. Moderate risk gamblers experience 35% of harms and problem gamblers 15% of harm.

## 12.2. Low risk, moderate risk and problem gamblers

### PREVALENCE OF PROBLEM GAMBLING

153. The prevalence of problem gambling in Victoria is set out in Table 12.1 below and examines the prevalence of low risk, moderate risk and problem gamblers in the study periods of 2008, 2014 and 2018-19.

Figure 12.1: PGSI Categories – 2008, 2014 and 2018-19<sup>11</sup>

PGSI Category	2008 (n=15,000)	2014 (n=13,554)	2018-19 (n=10,638)
Non-problem gambler	64.3%	57.6%	59.2%
Low risk gambler	5.7%	8.9%	6.7%
Moderate risk gambler	2.4%	2.8%	2.4%
Problem gambler	0.7%	0.8%	0.7%

154. This data shows that the prevalence of problem gambling has remained constant over the study years, shifting only 0.1% over the 10 year study period.
155. The greatest level of variation in prevalence was to low risk gamblers, increasing 3.2 percentage points from 2008 to 2014 and then dropping back 2.2 percentage points to 2018-19.

sa.gov.au/ data/assets/pdf\_file/0007/80368/sa-gambling- prevalence-study-report-2012.pdf

<sup>11</sup> This prevalence rate is for all types of gambling, not just EGM play.

156. For moderate risk gamblers, the prevalence rate also experienced a slight increase, but now sits back at the same rate as 2008. This 10 year period also saw an increase in the prevalence of moderate risk gamblers in 2014 but not to the same degree as low risk gamblers.
157. The study period has also seen a decrease in the proportion of non-problem gamblers, dropping from 64.3% to 59.2%. This group also saw a greater decrease in 2014 to 57.6%.
158. There has been an overall greater variation in the risk cohorts in the 2014 that has partially lessened to 2018-19. There does not appear to be an obvious reason for this variation in the data.

## CHARACTERISTICS OF PROBLEM, MODERATE RISK, LOW RISK AND NON-PROBLEM GAMBLERS

159. The report sets out various characteristics of gambling prevalence in Victoria. For ease of reference, we have prepared a table that sets out the characteristics of each of the risk profiles in Figure 12.2 below.

**Figure 12.2: Characteristics of problem, moderate risk, low risk and non-problem gamblers**

Characteristic	RISK PROFILE			
	Problem gamblers	Moderate risk gamblers	Low risk gamblers	Non-problem gamblers
Play EGMs	69.3%	52.3%	40.0%	16.3%
Play Australian lotteries	72.5%	63.0%	70.7%	n/a
Play raffle tickets, sweeps or other competitions	41.2%	41.3%	46.1%	n/a
Betting on horse/harness racing or greyhounds	52.4%	39.4%	42.5%	n/a
Scratch tickets	28.3%	27.8%	25.9%	n/a
Casino games	21.7%	22.7%	17.7%	n/a
Sports betting	25.0%	24.2%	20.9%	n/a
Informal private betting	21.3%	15.2%	10.7%	n/a
Keno	23.9%	11.2%	10.0%	n/a
Play EGMs in excess of 25 times a year	68.8%	18.1%	12.3%	3.4%
Male	1.0%	3.4%	8.4%	57.1%

Female	0.5%	1.5%	5.0%	61.2%
Personal income between \$20,800 - \$41,59 <sup>12</sup>	1.3%	3.2%	8.0%	n/a
Aged 18-34 years	1.1%	7.8%	n/a	n/a
Aged 35-54 years	2.3%	4.5%	n/a	68.9%
Aged 55-74 years	1.3%	3.3%	n/a	n/a
Aged 75 years or older	0.1%	1.5%	n/a	n/a
Aboriginal or Torres Strait Islanders	2.9%	4.6%	n/a	n/a
Play EGMs for 3 hours or more	15.1%	8.2%	5.1%	0.9%
Smoke daily	39.4%	30.2%	18.1%	10.0%
Always drink whilst gambling	22.8%	16.1%	11.8%	6.0%
Wellbeing Index Score (out of 10)	5.32	7.18	7.73	8.21

160. From this data it is evident that:

- Low and medium risk and problem gamblers are significantly more likely to play EGMS frequently (more than 25 times a year) with the prevalence increasing with the risk profile.
- All gamblers are likely to participate in a wide range of gambling activities with the main variation in prevalence evident in Keno, private betting and EGM play.
- Men are more likely to be at risk from gambling than women, regardless of the category.
- Medium risk and problem gamblers are more likely to sit in the same income bracket.
- Medium risk gamblers are more likely to be aged 18-24 whilst problem gamblers are more likely to be aged 35-54. There is little other over presentation in other ages groups or risk profiles.
- Medium risk and problem gamblers are more likely to have Aboriginal or Torres Strait Islander origin.
- Low and medium risk gambles and problem gamblers are more likely to play EMGs for extended periods of time, with the prevalence increasing with the risk profile.
- All gamblers are more likely to smoke and drink with the prevalence increasing with the risk profile.
- Gambler's wellbeing score decreases with their risk profile.

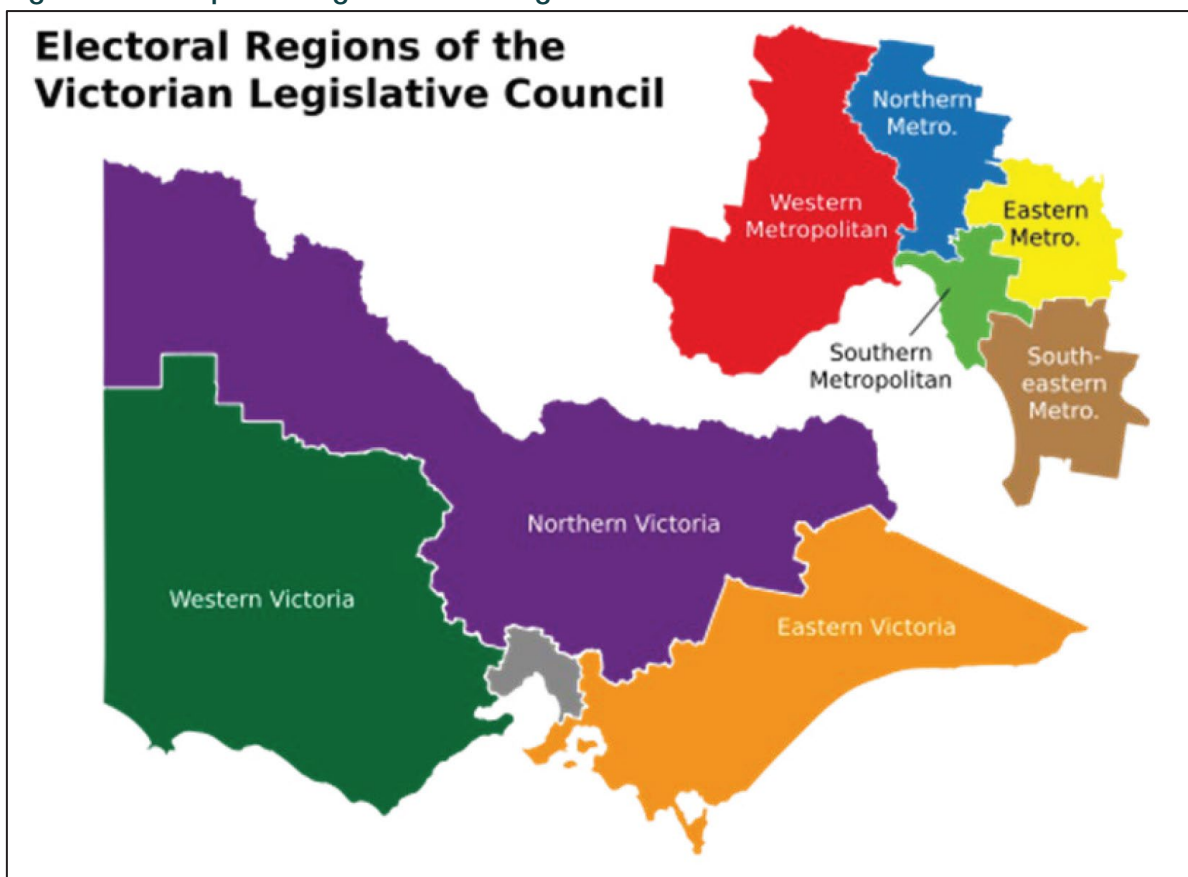
<sup>12</sup> The study found that both problem and moderate risk gamblers where most likely to be over represented in this income bracket with no statistically significant variation to low risk or non-problem gamblers

161. I have provided a review of how this impacts the local community that the Hotel is in later in the report.

### 12.3. Harm from gambling

162. The study also found that harm from gambling<sup>13</sup> was not evenly presented across Victoria with eight regions across the state having variances with the Western Victoria region (within which the Valley Inn Hotel sits) at 1.7% compared with a Victorian average of 1.8%. However, given the size of these regions, they give little insight to the extent of harm from gambling at a local level.

Figure 12.3: Map showing 8 electoral regions across Victoria

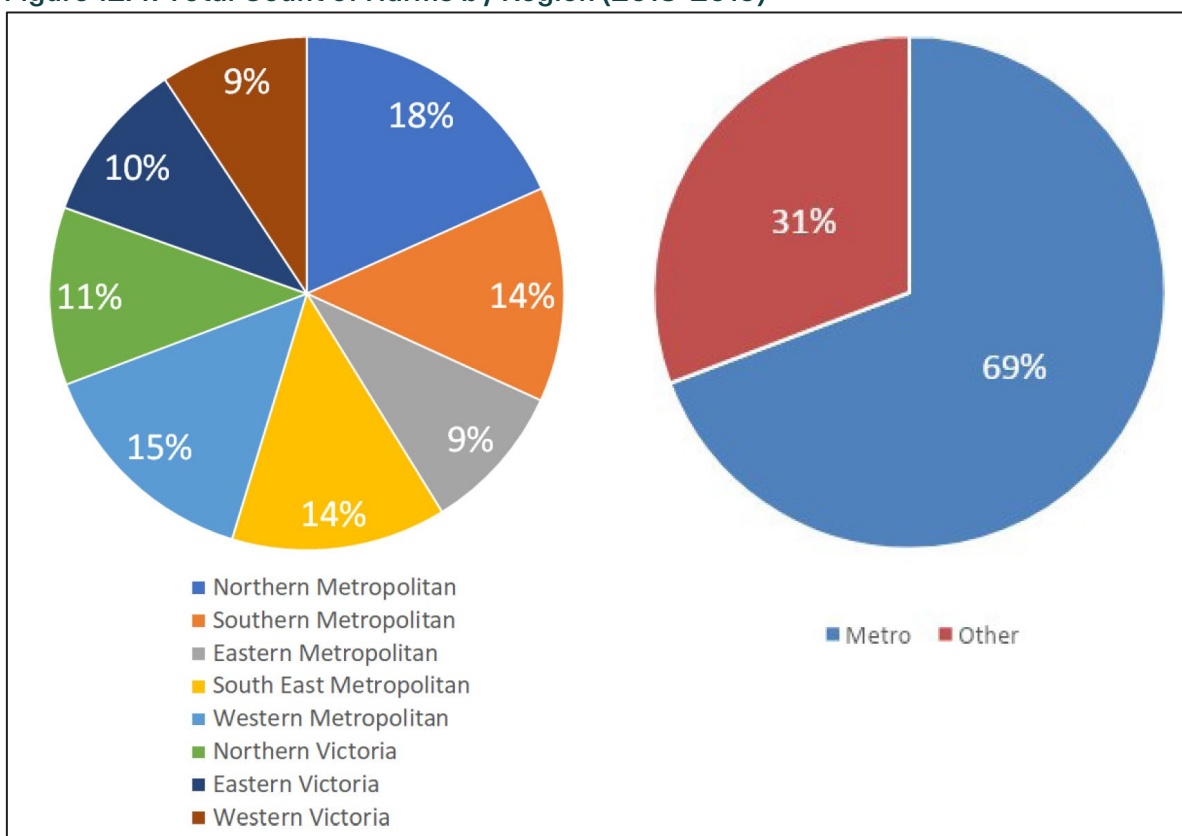


Source: Victorian Responsible Gambling Foundation, Victorian Population Gambling and Health Study (2018-19)

<sup>13</sup> This is not the same as the prevalence of problem gambling



Figure 12.4: Total Count of Harms by Region (2018-2019)



Source: Victorian Responsible Gambling Foundation, Victorian Population Gambling and Health Study (2018-19)

163. The study also provides a breakdown of harm by problem gambling status. This shows that whilst problem gamblers account for the highest singular group experiencing harms, that there are still substantial harms experienced by gamblers of other risk profiles.
164. Harms recorded on the Short Gambling Harms Screen (SGHS) are less severe harms and include the following:
  - Reduction of your available spending money
  - Reduction of your savings
  - Had regrets that made you feel sorry about your gambling
  - Less spending on recreational expenses such as eating out, going to movies or other
  - Felt ashamed of your gambling
  - Felt like a failure
  - Felt distressed about your gambling
  - Spent less time with people you cared about
  - Increased credit card debt
  - Sold personal items

165. The 'extra harms' reflect relatively less frequent but more severe types of gambling harm such as:
- Spent less on essential expenses such as medication, health care and food
  - Experienced greater conflict in my relationships (arguing, fighting, ultimatums)
  - Been a victim of family/domestic violence
  - Didn't fully attend to needs of children
166. The prevalence of harms increases with problem gambling severity with extra harms most prevalent amongst problem gamblers. These figures reinforce the need to address all problem gambling profiles through harm minimisation measures.

**Figure 12.5: Total count of harms by problem gambling status (SGHS)**

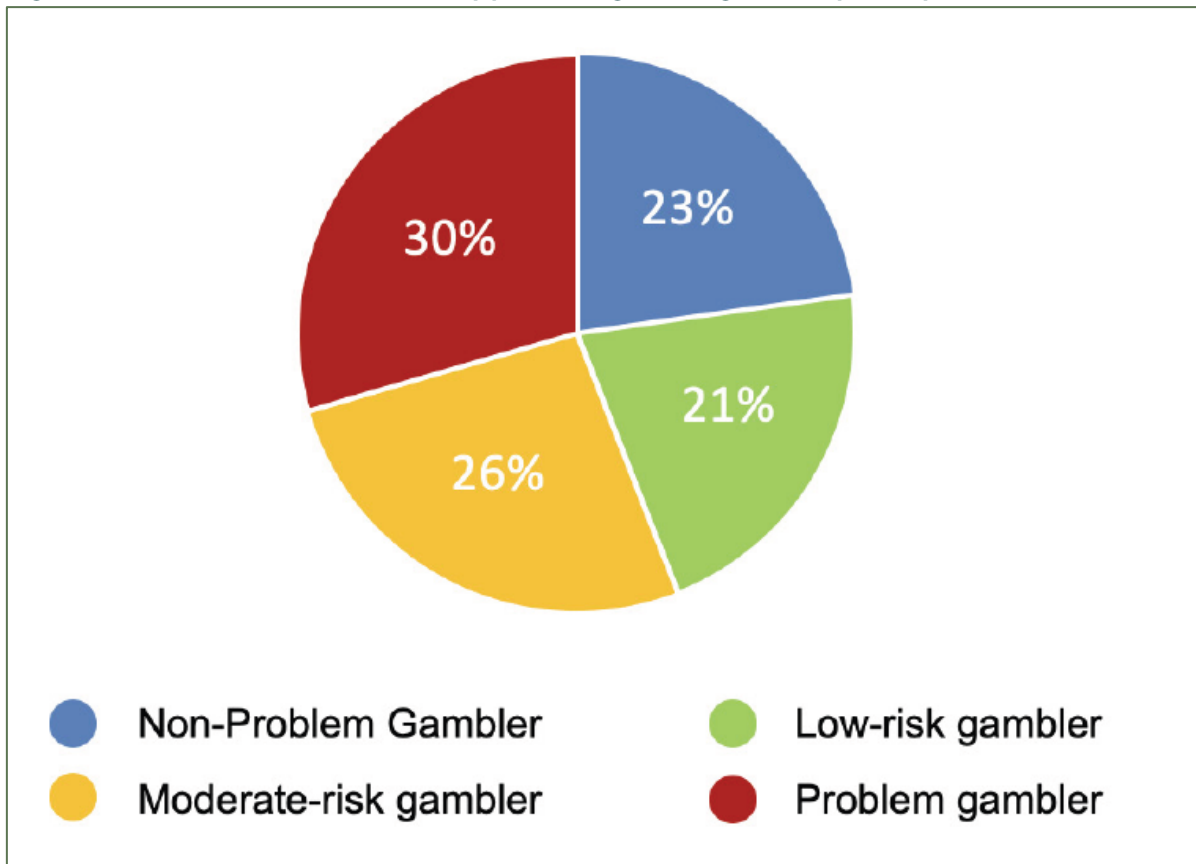
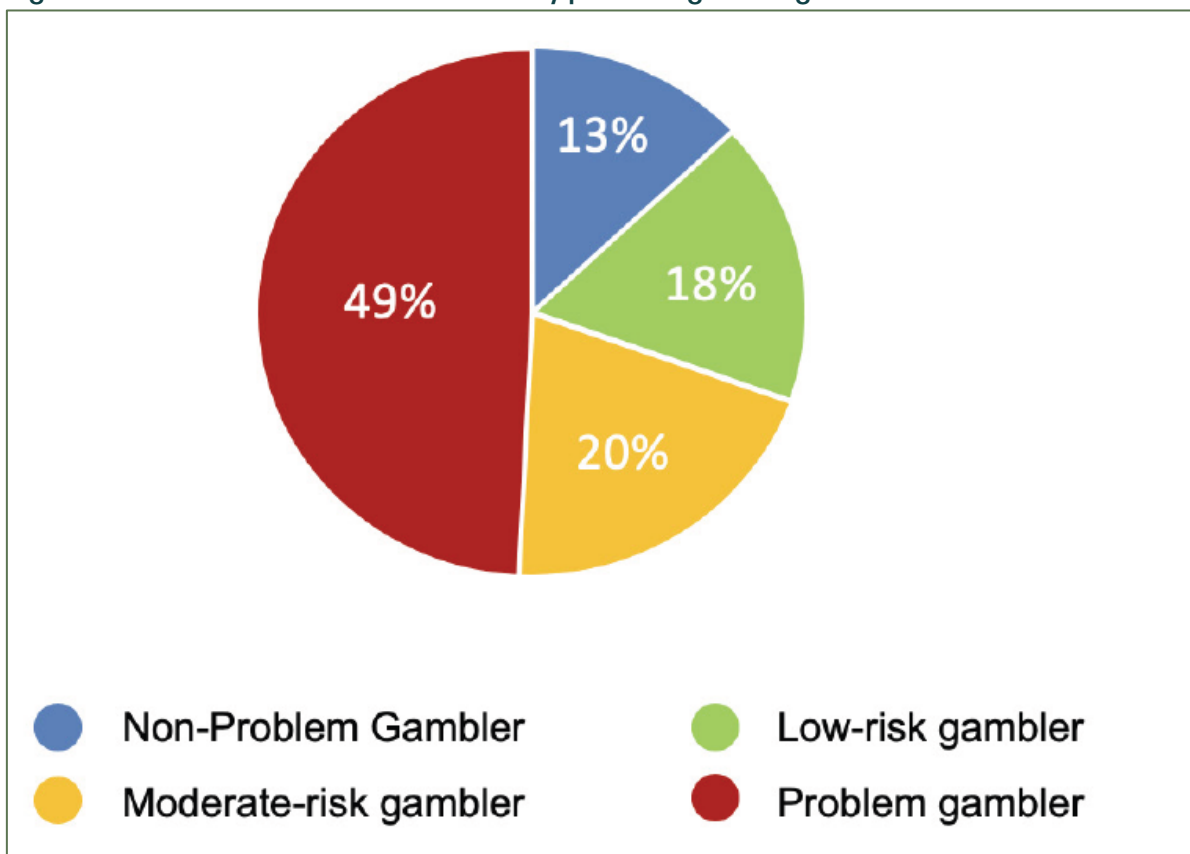


Figure 12.6: Total count of extra harms by problem gambling status



## 12.4. EGM Gambling

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

- Gamblers who spoke English at home (21.2%) were more likely to play EGMs than those who spoke another language (16.5%).
- As a percentage, more people play EGMs in regional Victoria (25.4%) compared with Metro based gamblers (18.8%).
- Nearly three quarters (73.3%) of people playing gaming machines played one to six times a year with 2.9% playing more than weekly.
- 14.1% of gamblers have played EGMs in the previous 12 months, and contrary to popular opinion men having a higher participation rate in EGMS play than women at 15.5% compared with 12.7%.
- Older gaming machine players (75 and over) gambled more frequently playing every 1 to 2 weeks at 17.4% compared with younger age groups at 5.8% overall.
- Interesting, younger EGM players (18-24 years) were significantly more likely to play EGMs at the Casino (46.1%) compared with older people (75+) at 12.8%.
- Participation in playing EGMs decreased from 21.5% in 2008 to 14.1% in 2018-19.

## 12.5. Victorian Population Gambling and Health Study 2023

168. This more recent iteration of the Victorian Population Gambling and Health Study surveyed approximately 11,000 Victorian adults between January and May 2023, with the final report released in September 2024.
169. Whilst it does not provide a direct comparison to the previous study, it does provide updated information on gambling participation, gambling problems and gambling related harm. Key changes include detailed questions around expenditure for each gambling activity and 'affected others'.
170. One of the key findings of the study is that gambling participation has declined significantly since the previous study, down to just over half (53.3%) of Victorian adults having participated in the past year compared with 69% in 2018-19.
171. Other key findings include:
- The decline in gambling participation is across all gambling products and activities, with nearly half of those who did participate in gambling doing so on only a single gambling activity.
  - The gambling activities with the largest decreases in participation rates were gambling on lottery, raffle tickets, racing (horse, harness or greyhound) and EGMs.
  - A quarter of people who gamble do so weekly or more frequently, with lottery and bingo having the highest proportion of high frequency participation followed by sports betting.
  - Victorians who gamble spend on average \$2,450 per year. EGMs, casino table games and sports betting were the products with the highest percentage of those participating spending greater than \$10,000 in the previous year (EGMs - 6.1%; casino table games - 4.5%; and sports betting - 4.2%).
  - The prevalence of problem gambling has remained relatively stable between the 2018-19 survey and the 2023 survey, with a slight increase of 0.2% in problem gambling. However, there has been a decrease in the prevalence of both low risk gambling (1.4 percentage point decrease) and moderate risk gambling (0.1 percentage point decrease). We have reproduced Table 12.1 below with the most recent survey results.

PGSI Category	2008 (n=15,000)	2014 (n=13,554)	2018-19 (n=10,638)	2023 (n=10,888)
Non-problem gambler	64.3%	57.6%	59.2%	44.8%
Low risk gambler	5.7%	8.9%	6.7%	5.3%
Moderate risk gambler	2.4%	2.8%	2.4%	2.3%
Problem gambler	0.7%	0.8%	0.7%	0.9%

- Despite declining participation rates, harm among people who gamble has increased with 13% reporting at least one form of gambling harm, compared to 9.6% in 2018-19.
- Those most likely to experience gambling harm were people who gambled on casino table games (36%), followed by sports (35%), bingo (32%) and EGMs (29%).
- Increased risk of problem gambling is associated with lower wellbeing and other health issues.

172. I note that there is no data available at an LGA level. Whilst respondents were asked their postcode and suburb of where they live, the reported findings grouped the locations at a regional level, being in Melbourne or Rest of State.

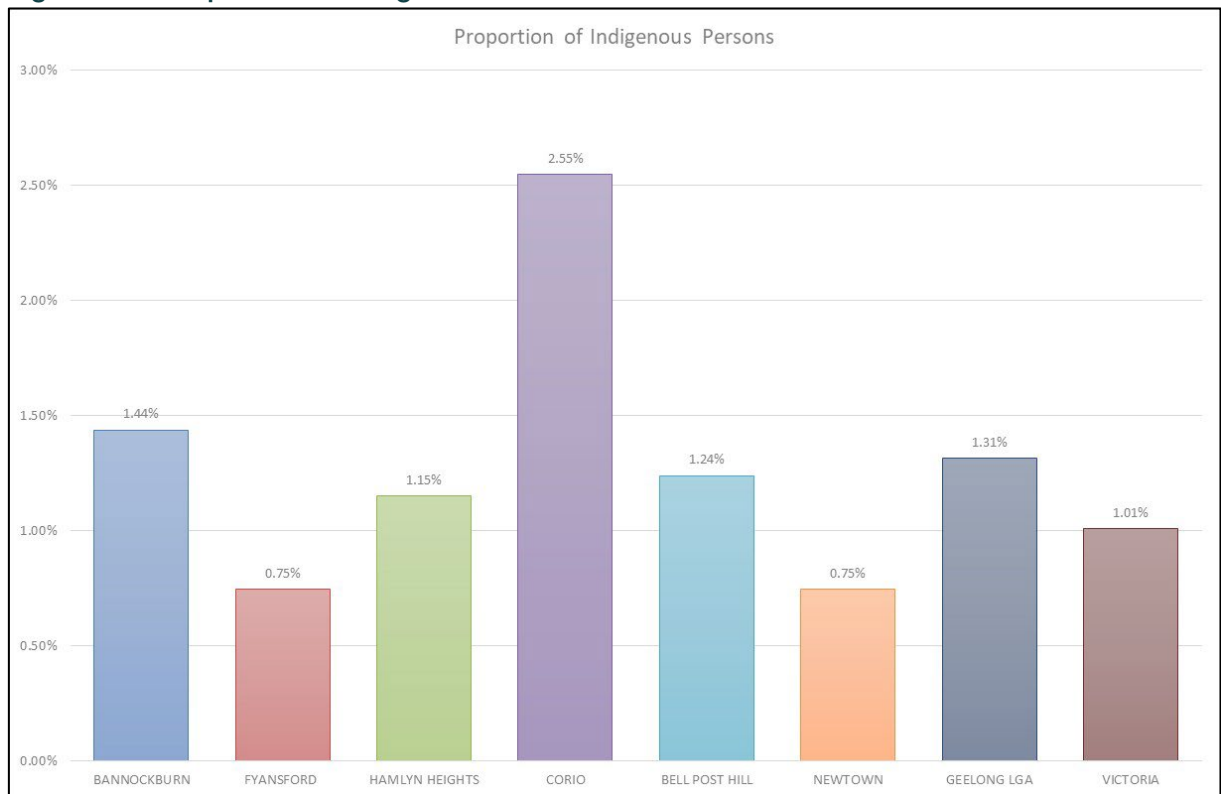
# 13. Harm Minimisation

## 13.1. Introduction

173. The changes to the *Victorian Gambling and Casino Commission Act 2011 (Vic)* in 2022 has resulted in a shift of focus away from problem gambling. It now seeks to focus on minimising harm to all gamblers.
174. The characteristics of all gamblers is set out in the previous section and identified that the key characteristics of problem gamblers can also be attributed to other gambling risk profiles. These key characteristics which we are able to review include:
- Proportion of Aboriginal and Torres Straight Islanders.
  - Residents with a low to mid-range income (\$20,800 - \$41,599).
  - Persons aged between 18 and 24 years old.
  - Persons aged between 35 and 54 years old.
175. We have reviewed the prevalence of these characteristics and benchmarked them against the Victorian average and provided further discussion as to how these population cohorts are protected through appropriate RSG measures.



**Figure 13.1: Proportion of Indigenous Persons**



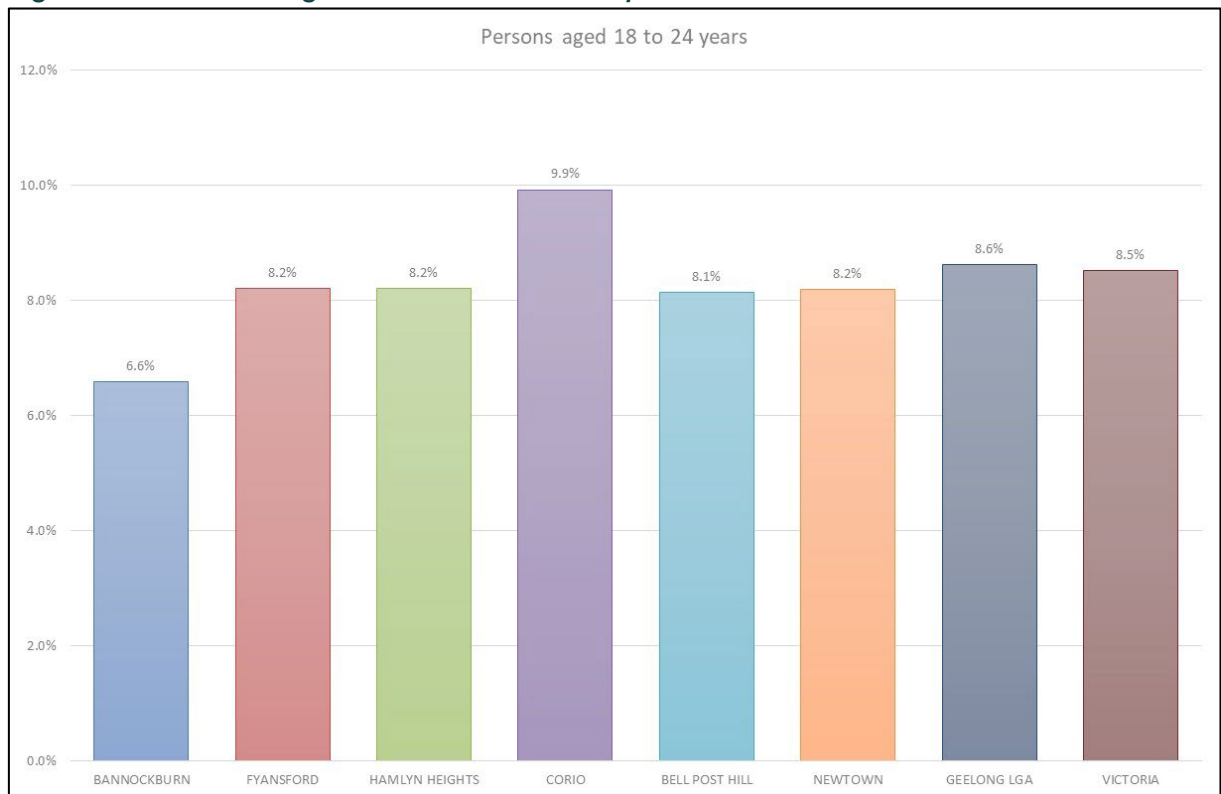
176. There are higher proportions of persons identifying as Aboriginal or Torres Strait Islanders within the patron catchment compared to the Victorian average. The exception is in the suburbs of Fyansford (where the venue is located) and Newtown.
177. However, whilst Aboriginal and Torres Strait Islanders were more likely than non-Aboriginal or Torres Strait Islanders to be moderate risk or problem gamblers, there was no significant differences in EGM play by indigenous status.
178. Gamblers of Aboriginal or Torres Strait Islander decent were more likely to have spent money on informal private betting.
179. Given this preference for informal private betting rather than EGM play, we do not consider that the relocation of 28 EGMs to the Fyansford Hotel will have a detrimental impact on gambling behaviour of this population cohort, particularly given the lower proportion of this population within Fyansford.

**Figure 13.2: Low to mid-range personal income**



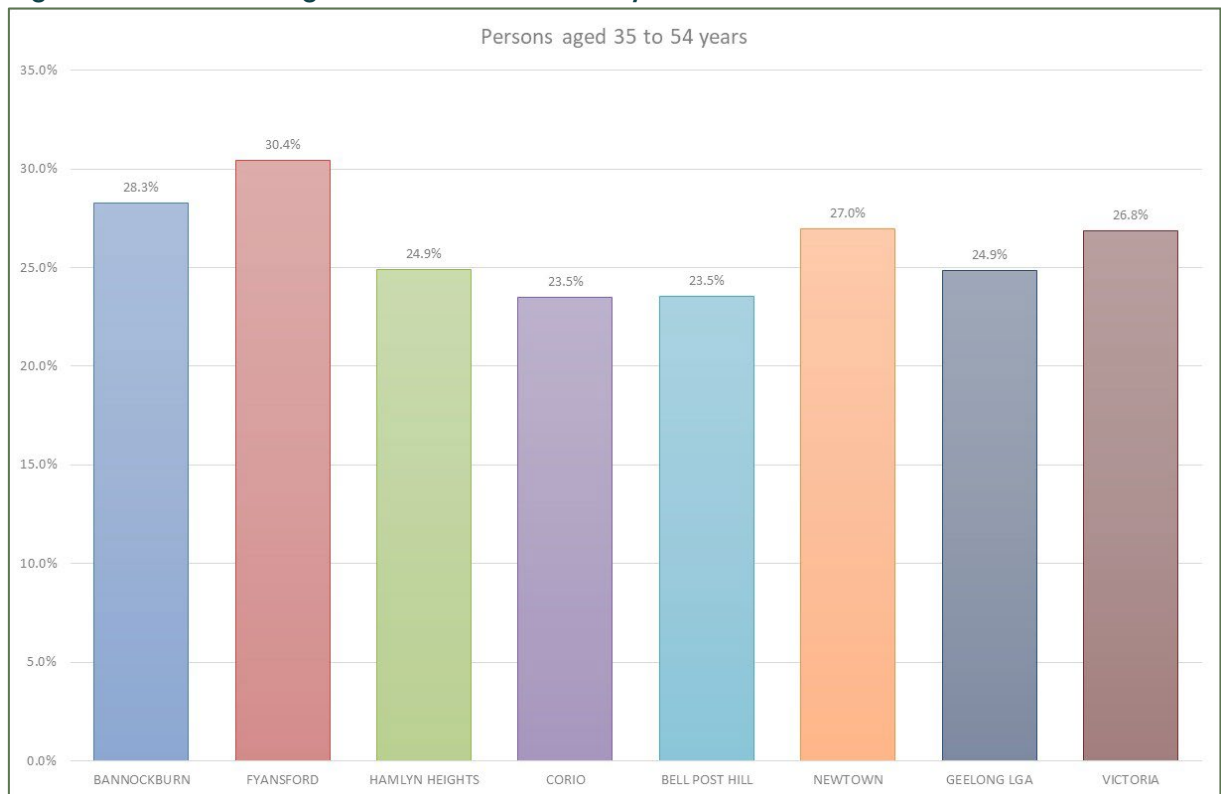
180. The patron catchment generally has higher proportions of residents who earn a low to mid-range income of between \$20,800 and \$41,599 per annum when compared to the Victorian average. The exceptions are in Fyansford, Bannockburn and Newtown.
181. Residents of the suburbs that make up the patron catchment currently have access to five other venues within these suburbs which include 251 EGMs.
182. The low utilisation at the venue combined with a modest NMR would indicate that problem gambling is not a concern at this venue. Additionally, these residents would already be able to access a machine of their choice given the general availability of machines. Further, I note that the application will not result in any additional EGMs within the catchment and as such, the risk does not increase.

**Figure 13.3: Persons aged between 18 and 24 years**



183. The patron catchment has slightly lower proportions of persons aged between 18 and 24 years when compared to the Victorian average. The exception is Corio which sits above the Victorian average.
184. We have not been provided with an age profile of patrons to the venue, however, given that the number of persons aged 18 to 24 years in the primary patron catchment is similar to the Victorian average, we do not consider that the application to increase machine numbers at the venue to be a significant risk. Additionally, the removal of EGMs from a venue that is focused around young people is a positive outcome.
185. However, it would be appropriate that education and training on this issue be included for staff to ensure that they are aware of the potential risks to younger players.

**Figure 13.4: Persons aged between 35 and 54 years**



186. The patron catchment has both higher and lower proportions of persons aged between 35 and 54 years when compared to the Victorian average.
187. Whilst persons within this age bracket were identified as being at greater risk of problem gambling under the problem gambler profile set out in the Victorian Population Gambling and Health Study, specific to EGM play, the study found that this population cohort were least likely to have played EGMs.
188. Based on the above, the patron catchment exhibits a mixed profile when reviewing characteristics of all gambling cohorts. Accordingly, it is important to review the proposal with regards to harm minimisation measures which are set out in Section 15 of this report.

# 14. Harm from Gambling

## 14.1. Introduction

189. The *Casino and Liquor Legislation Amendment Act 2022 (Vic)* came into effect on 28 June 2022. It made changes to the regulatory powers of the VGCCC. In particular, it amended the Victorian Gambling and Casino Commission Act 2011 (Vic) to include a specific reference in the objectives of the VGCCC to minimise gambling harm and problem gambling.
190. This tasks the Commission with focusing on minimising gambling harm from all gamblers and not just problem gamblers.
191. Given that gambling can pose significant harms, it is important to recognise and address the negative consequences associated with this activity. Key concerns associated with gambling include the potential for addictive behaviour and the subsequent financial, emotional and social problems that can arise.
192. Whilst the majority of people who participate in gambling, do so without experiencing any or little of these harms, it is important to ensure that they do not develop more meaningful problems associated with their behaviour.
193. Harm minimisation measures that are incorporated into a gaming venue, do by their very nature assist in reducing the risk to all gamblers. Whilst the primary focus is on the most vulnerable group i.e. problem gamblers, these measures assist in ensuring that all gamblers are provided with the duty of care associated with the responsible provision of gambling and ensure that the venue is reducing the risks of gambling related harm to a level that is as low as is reasonably practicable.

## 14.2. What is Problem Gambling?

194. Problem Gambling is generally defined as follows:

*Problem Gambling is characterised by difficulties in limiting money and / or time spent on gambling, which leads to adverse consequences for the gambler, others or for the community<sup>14</sup>.*

195. Whilst this proposal involves the relocation of existing machines, the expenditure analysis prepared by Mr. Tim Stillwell indicates that there will be a net increase of between \$447,349 and \$595,904 expenditure in the first 12 months after the machines are relocated. As with all venues, there is the potential for some of this additional expenditure to be derived from problem gambling behaviour.

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<sup>14</sup> Neal P, Delfabbro P & O'Neil M, 2005, *Problem Gambling and Harm: Towards a National Definition* – Prepared for the former Victoria Gambling Research Panel by the South Australian Centre for Economic Studies.

196. The best estimates that are available (such as those made by the Productivity Commission and Longitudinal Study) estimate that 1-2% of the Victorian adult population are problem gamblers.
197. The Productivity Commission Report also estimates that in the order of 40% of gaming revenue is the result of problem gambling.
198. This finding is often misinterpreted, and it is incorrectly assumed that 40% of all gaming revenue is a result of problem gambling. This approach is incorrect as it is well established that problem gambling is not experienced in a spatially consistent manner.
199. Instead, it is necessary to examine each individual application and, using the best information available, to determine the level of risk of increased problem gambling associated with a proposal.
200. A report by the Victorian Responsible Gambling Foundation in 2017<sup>15</sup> examined the share of problem gambling expenditure by problem gambling severity and specifically looked at EGMs, table games at Crown Casino, wagering, lotteries and keno. The share of expenditure for each of these gambling activities by gambling severity is shown below. I note that the EGM figure includes expenditure at hotels, clubs and Crown Casino.

**Figure 14.1: Share of gambling expenditure by problem gambling severity, Victoria (2014-15)**

Gambling activity	PGSI Group			
	Non-problem gamblers	Low-risk gamblers	Moderate-risk gamblers	Problem gamblers
Electronic gaming machines (EGMs)	18.7%	22.0%	23.6%	35.8%
Table games (Crown Casino)	6.9%	15.3%	19.1%	58.7%
Wagering	33.2%	55.8%	7.5%	3.5%
Lotteries	64.0%	17.6%	13.2%	5.1%
Keno	18.7%	22.0%	23.6%	35.8%

201. Whilst this data shows that problem gamblers have the greatest share of expenditure on EGMs, this figure includes those gamblers at Crown Casino, and I would expect that this figure is lower when expenditure at Crown Casino is removed from the overall figure.
202. It is reasonable to assume that as a result of the introduction of additional gaming machines, there is a risk of an increase in problem gambling. However, as detailed below, we consider the risk associated with this application to be relatively low.

<sup>15</sup> 'The social cost of gambling to Victoria', Victorian Responsible Gambling Foundation, November 2017



### 14.3. Problem Gambling in Greater Geelong

203. For a significant period, the Department of Justice report 'Problem Gambling from a Public Health Perspective' was the only source that provided some guidance on the risk of problem gambling in the area.
204. To a degree, some of the findings in this report have been superseded by the State Government's 'Study of Gambling and Health in Victoria, Findings from the Victorian Prevalence Study 2014'.
205. The latest report provides updated figures on the changes in prevalence of problem gambling within each Victorian Government region.
206. The Barwon South West region (within which the City of Greater Geelong sits) recorded a prevalence of 1.24% of adults surveyed being problem gamblers with the rate of problem gambling in Victoria sitting at 0.81%. For the other risk profiles the figures are as follows:
  - Non-problem gamblers: 65.25% in Barwon South West compared to 57.59% for Victoria
  - Low-risk gamblers: 6.27% compared to 8.91%
  - Moderate-risk gamblers: 1.18% compared to 2.79%
207. This shows that the Barwon South West region experiences lower rates of low-risk and moderate risk gamblers compared to the Victorian average and has a higher proportion of non-problem gamblers when compared to the Victorian average.
208. This is the only known information that seeks to quantify problem gambling at a geographic level in Victoria, recognising it has limitations given that the Barwon South West region includes 9 LGAs<sup>16</sup> of varying demographic profiles.

### 14.4. Best practice and its role in minimising harm from gambling

209. Electronic gaming in Victoria is a legitimate recreational activity but one that comes with risk, in particularly the risk of problem gambling. The regulatory framework around the provision of EGM play focuses on minimising these risks with an acceptance that they cannot be completely mitigated.
210. For example, it is well accepted that particular types of venues can increase the level of risk for problem gambling. These include:
  - Venue operating after midnight<sup>17</sup>
  - Venues where anonymity is likely to be achieved. Such features can include direct access from a car park, little passive surveillance from within a venue or gaming rooms with larger number of machines<sup>18</sup>

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<sup>16</sup> This region includes the following municipalities: Colac-Otway, Greater Geelong, Queenscliffe, Surf Coast, Corangamite, Glenelg, Moyne, Southern Grampians and Warrnambool.

<sup>17</sup> 'Evaluation of the 6 hour shutdown of Electronic Gaming Machines in NSW', Blue Moon Research & Planning prepared for the NSW Office of Liquor, Gaming and Racing, April 2008.

<sup>18</sup> 'The Influence of Venue Characteristics on a Player's Decision to Attend a Gambling Venue', Professor Nerilee Hing & Dr John Haw, Centre for Gambling Education & Research, Southern Cross University, March 2010.

- The absence of other non-gaming entertainment offerings<sup>19</sup>
- Location in direct proximity to day to day shopping<sup>19</sup>
- The management of a gaming venue that entices/encourage players to stay at the machines without a break in play<sup>20</sup>

211. It is appropriate that electronic gambling is provided in an environment that seeks to minimize risk to all gamblers. This is in accordance with the objectives of the Gambling Regulation Act 2004, the Victorian Gambling and Casino Control Commission Act 2011 (Vic) and well-established practices of harm minimisation.
212. Whilst the proposal is for a top-up at an existing venue and there is an opportunity to make improvements to a venue through this process, I am of the opinion that the venue complies with best practices in relation to the provision of responsible gaming.
213. I make the following observations with regards to some of the ideals of best practice in relation to responsible gaming which focusses on problem gambling. However, by protecting problem gamblers, these harm minimisation measures also protect all gamblers:

– ***Venues should be accessible but not convenient***

Contemporary thinking on the location of gaming machines is that these facilities should not be located within or adjacent to convenience shopping facilities. Instead, gaming should be located in and around activity centres, but not in convenient locations such as proximate to the main retail core and retail uses.

The location of a gaming venue should allow those who wish to legitimately participate in recreational gambling to do so, without encouraging convenient or unplanned gambling. Accordingly, venues are most appropriately located at the periphery of activity centres, away from these areas of activity.

– ***Gaming a subservient offer at the venue***

In venues where gaming is present, it should not appear as the dominant feature of the venue and should comprise a minor component of the overall offer. The provision of non-gaming facilities at a gaming venue have been found to be the only protective factor against problem gambling<sup>18</sup>.

Gaming venues should include a broad range of non-gaming entertainment and recreation facilities e.g. bistro, sports lounge, beer garden, café area and function facilities.

– ***There should be passive surveillance of entry into/out of gaming room***

Gaming patrons should not be able to enter and exit the gaming room undetected as this increases anonymity for gamblers. Ensuring the entrance to the gaming room is in a location that is fully visible to others reduces the opportunity for anonymity.

– ***No direct access to the gaming room from car parks or front entrances***

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<sup>19</sup> 'Problem Gambling from a Public Health Perspective', Department of Justice, September 2009. Problem gamblers prevalence of smoking sits at 53.9% compared to 27.7% for all Victorian adult gamblers.

<sup>20</sup> 'The Influence of Venue Characteristics on a Player's Decision to Attend a Gambling Venue', Professor Nerilee Hing & Dr John Haw, Centre for Gambling Education & Research, Southern Cross University, March 2010.

Similarly, direct access from the car park or front entrance allows gamblers to enter the gaming room undetected. Anonymity is attractive to problem gamblers and therefore reducing the opportunities for this to occur is a deterrent<sup>19</sup>.

– ***Patrons should be able to see broader offer at the venue***

When patrons enter a venue, they should be able to see the full range of facilities on offer before they enter the gaming room. This ensures that they are making a conscious decision to enter the gaming room and are given the option of a range of non-gaming related activities to participate in.

– ***Screening of machines from view from non-gaming parts of the venue***

Gaming machines should be screened both visibly and audibly from other non-gaming parts of the venue. This allows non-gambling patrons or those taking a break from gambling to enjoy other parts of the venue.

– ***Hours of operation***

The longer a gaming venue is open the greater the accessibility to gaming machines for problem gamblers. The Productivity Commission recommends that gaming venues be closed for a minimum of 6 hours a day in order to provide a sufficient break from problem gamblers and recommends a closure of 2am.

– ***Smoking lounges***

Given that we know that problem gamblers have a higher rate of smoking than all Victorian adult gamblers<sup>19</sup>, designated outdoor smoking areas should not be directly accessible from the gaming room. The separation of these areas away from the gaming room ensures that gaming patrons are able to take a break from gaming and walk away from the venue.

– ***Non-gaming facilities being open when the gaming room is open***

In line with gaming forming a subservient part of a venue, it is important that other parts of a venue are also operating at all times that the gaming room is open. This ensures that gaming patrons are able to take a break away from gaming machines.

– ***RSG practices***

Gaming venues should have venue specific policies and strategies that address their particular needs and situations rather than a one size fits all policy. The implementation of these policies is critical in ensuring harm minimization practices occur at the venue.

These practices often include excellence in customer service, with repeated contact and communication with customers. Whilst this may appear counter intuitive, it has been well established anecdotally that good and regular contact with customers breaks down anonymity and creates an environment of trust where irregular or unusual behaviour is more likely to be successfully addressed.

214. I am mindful that there is no research or studies that I am aware of that can confirm the efficacy of these harm minimisation measures. However, these principles directly respond to various pieces of research that establish various physical, environmental and/or management factors that can be attractive to problem gamblers.

215. These principles, are in part, encapsulated by the Victorian Responsible Gambling Foundation in its document 'Venue Best Practice Guide'. The adoption of this approach by the VGCCC (and its predecessors) is consistent with the overall approach to harm minimisation in Victoria.
216. I acknowledge that some RSG practices will provide a greater protective layer to patrons than others depending upon the risk profile of the gambler. I have prepared the following matrix which sets out which RSG practices will have the greatest impact on each gambler profile type. This is based on my opinion which is guided by academic research and studies into gambling. I note that a key piece of research in this field is work undertaken by Hing and Haw<sup>20</sup>.
217. As an example, a venue that closes before 2am would provide a greater protective layer to problem and moderate risk gamblers but have little impact on low-risk or non-problem gamblers as they are less likely to participate in gaming at these late hours.

Figure 14.2: RSG practices and gambler risk profile impacts

RSG Practice	Problem gamblers	Moderate risk gamblers	Low risk gamblers	Non-problem gamblers
Venues should be accessible but not convenient	X	X	X	
Gaming is a subservient offer at the venue	X	X	X	
Passive surveillance of entry into/out of gaming room	X	X	X	
No direct access to gaming room from car park or front entrance	X	X		
Patrons should be able to see broader offer at the venue	X	X	X	X
Screening of machines from view from non-gaming parts of the venue	X	X	X	X
Hours of operation closure no later than 2am	X	X		
Smoking lounges away from gaming room	X	X	X	X
Non-gaming facilities open at same time as gaming room	X	X	X	X

218. As can be seen in the previous table, each of the RSG practices are likely to provide a protective layer for both problem and moderate risk gamblers. This is consistent with the idea that by protecting the most vulnerable users, all gamblers are provided with the duty of care associated with the responsible provision of gambling.
219. However, it is important to recognise that some of these measures will also specifically target low risk and non-problem gamblers.
220. More specifically, having gaming as a small overall offering at a venue and having passive surveillance into and out of the gaming room will enable those patrons who are at a venue for reasons other than gaming to enjoy the broader range of non-gaming entertainment and recreation facilities without gaming being front and centre to their visit.
221. Similarly, the screening of gaming from other parts of the venue will ensure that these patrons can enjoy a meal or other activities at the venue without being exposed to gaming if they choose not to.
222. Longer hours of operation lead to greater accessibility to gaming machines. Problem gamblers are more likely to gamble late at night and as such closing a venue no later than 2am will have the greatest impact on these players as opposed to low risk and non-problem gamblers. This application proposes no changes to the existing hours of operation with modest hours between 10am and 2am Monday to Saturday and between 10am and midnight on Sunday.

# 15. Is the Fyansford Hotel consistent with best practice?

223. Having set out the components of best practice in Section 14.4, I am comfortable that the Fyansford Hotel demonstrates strong compliance with best practice in relation to the responsible provision for gaming for the following reasons:

- The venue is not located within an area of convenience shopping. It is not located proximate to any major retailing or other day to day activities which will serve to minimise convenience gaming.
- The venue is a destination venue in its own right, as it is not located within or adjacent to a shopping strip or convenience shopping facilities. As an existing venue, the location as such has already been determined as being appropriate. Likewise, the Bell Park Sport & Recreation Club is a destination venue in its own right, located away from any strip shopping or convenience shopping facilities.
- The proposal seeks to add additional facilities for patrons including an expanded bistro and children's play area. The venue currently has limited abilities to cater for functions and the expanded bistro will allow greater flexibility of spaces and function types, ensuring the venue continues to provide for a full range of entertainment and recreation options.
- The main entrance to the gaming room is located adjacent to the main bar and within the bistro. It is able to be observed by bar staff and other patrons as users have to pass through the bistro to enter. The secondary entrance from the western side of the building is accessed via the public bar and visible from the cashier/gaming bar. There is no opportunity for patrons to enter the gaming room undetected.
- There is no direct access to the gaming room from the street or car park and patrons must fully enter the venue and be able to see all non-gaming facilities on offer at the venue before entering the gaming room. Observations at the Bell Park Sport & Recreation Club where the gaming machines will be relocated from show that there is an ability to enter the gaming room without first entering the rest of the venue.
- The gaming room is appropriately screened from other non-gaming parts of the venue. The main entrance to the gaming room will be reconfigured to reduce visibility into the gaming room from the bistro. This includes the provision of obscure glass sliding doors and timber slat screens. The main entrance to the gaming room at the Club does not include obscure glass which means that the machines are in view to any patron entering the venue. There is an obscure frosted glass sliding door allowing access to the gaming room from the TAB area which adjoins the bistro.



- The gaming room has modest trading hours, between 10am and 2am six days a week and between 10am and midnight on Sunday. This means that the gaming room is closed for a minimum of 8 hours each day providing a substantial break in play. The Club also has very modest trading hours between 11am and 11.30pm.
- The entire venue is open at all times that the gaming room is open, with food (snack menu) available at all times.
- There is a designated outdoor smoking area that is available to patrons that is accessed from outside the gaming room. This allows patrons to take a visual and audible break away from the machines.
- An independent responsible gaming consultant, Danny Nixon-Smith from DNS Specialist Services, has undertaken an audit of the venue and concluded that the proposed increase in gaming machines is unlikely to result in a detrimental impact on the local community and that the overall redesign to accommodate the additional machines reflects a considered approach to harm minimisation, supervision and separation from family-oriented areas. Additionally, the venue continues to be run by experienced operators with excellent knowledge of the responsible service of gambling.

224. Based on the above, I consider that the proposal results in a venue that seeks to minimise the risk of harms from gambling to the local community and at-risk groups to a level that is as low as is reasonably practicable. There are aspects of the Club that do not align with best practice, namely the access to the gaming room and the lack of other non-gaming facilities and their removal from a facility that has a focus on young people is a positive outcome.

## 16. Community Attitude

225. I am cognisant of the necessity to consider community attitude to the introduction of EGMs on community wellbeing, in particular noting the Court of Appeal decision on the Romsey Hotel. We note that there were very specific circumstances in that particular case that led VCAT to form the view that community opposition to gaming would have a significant social detriment on that community.
226. This application is considered to be significantly different to that of Romsey for the following reasons and therefore little weight should be placed on likely community opposition to the proposal:
- Geelong and the area within which the Hotel is located is not an isolated community, and residents are part of an integrated urban fabric with significant levels of interactions with the surrounding urban area.
  - The community already has access to gaming within the municipality and at the venue. This situation is unlike the Romsey case, whereby the Hotel was to introduce gaming into the town that didn't already have gaming and residents would have to travel much greater distances to participate in gaming (in the order of 20-25km).
  - This application is for a top up of additional machines at an existing gaming venue. The introduction of an additional 28 machines will have significantly lesser impact on community wellbeing than the creation of a new venue, regardless of the proximity of other gaming venues in the locality.
227. I do not consider that the relocation of existing machines will have any meaningful impact on the psyche of residents. In forming this view, it is noted that residents already have reasonable exposure to gaming in the local community including with the existing machines at the venue.
228. Additionally, community members accessing the Bell Park Sport & Recreation Club are supportive of the removal of machines from that facility.

# 17. Social and Economic Impacts

229. The social and economic impacts of gaming can be both positive and negative. Having reviewed a range of potential impacts on the local community as well as documents regarding whether or not gaming expenditure is a positive or negative impact, the approval of this application will have a slightly positive impact on the local community, which is evidenced by the following tables.
230. The main benefits of the application are:
- The expansion of facilities on offer at the venue including the construction of an expanded bistro providing additional dining opportunities and function capability through the provision of room dividers, at a cost of approximately \$2 million. This will allow the venue to host more functions and provide additional dining opportunities that it otherwise cannot provide which will result in an overall greater offer to the community and venue users.
  - The closure of the Bell Park Sport & Recreation Club as a gaming venue resulting in a net reduction in the number of gaming venues within the City of Greater Geelong and the relocation of EGMs away from a venue that has a strong focus on young people to a venue that provides a more balanced offer of non-gaming facilities.
  - Complementary expenditure of approximately \$1.03 million in the first year.
  - Provision of an additional annual \$10,000 cash contribution to be paid monthly in arrears to the Bell Park Sports & Recreation Club for the life of the entitlements.
  - Creation of an additional 6 EFT positions as a result of the application including 2.9 EFT positions in the gaming room.
  - An estimated increase of \$427,000 in supply and maintenance contracts.
231. There are other benefits attached to the application which are discussed in further detail in Table 17.1 and Table 17.2.
232. As with any application for gaming machines, the main disbenefit is the increased risk to all gamblers. This application is no exception.
233. I have reviewed each of the benefits and disbenefits of the application and attached weight to each in order to establish what the overall net impact on the community will be. These conclusions are expanded upon in the following sections of this report.
234. The following weighting scale has been used:
- Negligible/Neutral
  - Low
  - Moderate

– High

235. In determining the weighting of each impact, it is important to consider the impact in the context of the overall size of the economy of the City of Greater Geelong and the community that will be impacted. For example, the City of Greater Geelong has an economy currently valued at \$20.51 billion<sup>21</sup> and a population of 271,057 residents.
236. According, in weighing the impacts it is possible for something to have a significant benefit or disbenefit to those immediately impacted but that when viewed in the context of the community, this impact will be diluted.
237. I make this judgement call given the requirement to evaluate the net economic and social impact on the wellbeing of the community of the municipal district in which the premises are located, not just the impacts on those immediately surrounding the site or those immediately affected.

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<sup>21</sup> [economy.id.com.au/geelong](http://economy.id.com.au/geelong)

Figure 17.1: Review of Social Impacts of the Application

Likely Social Impacts			
Social Benefit		Social Disbenefit	
Renovation works to provide greater range of facilities and improved usability	<p>The provision of an expanded bistro creating additional dining options and greater function capability will reduce the emphasis of gaming at the venue and provide some benefit to the local community by allowing for more options for dining and functions.</p> <p>LOW BENEFIT</p>	Harm from gambling, including problem gambling	<p>Given that the application results in the relocation of machines and the closure of a venue (in an area experiencing more disadvantage), we consider that there would be a slight reduction in accessibility for vulnerable members of the community.</p> <p>Some weight attached to increased risk for vulnerable groups, although given the current low utilisation and access to machines at the venue and within the local area generally, there is unlikely to be any noticeable impact on the local community.</p> <p>Further mitigated by RSG measures implemented at the venue including hours of operation in excess of the mandatory 6 hour shut down period.</p> <p>NEUTRAL - LOW DISBENEFIT</p>
Increased opportunities for recreational gaming (i.e. non-problem gambling)	<p>Little weight given the access to gaming machines at the venue and current low utilisation.</p> <p>NEGLECTIBLE BENEFIT</p>	Community attitude	<p>Reduced weight given existing level of access to gaming machines at the venue and the municipality generally.</p> <p>NEUTRAL OUTCOME</p>
Additional employment	<p>There is a benefit from increased employment (6 EFT positions), however, this is to be given reduced weight given the overall size of the local economy.</p>	Impact on Community Health/Connectedness	<p>Limited if any impact given existing access to 40 EGMs at the venue and the high level of access in the local community.</p>

	NEGLIGIBLE BENEFIT	NEGLIGIBLE DISBENEFIT
Provision of an annual \$120,000 contribution to Bell Park Sport & Recreation Club	<p>Some weight attached to the provision of an ongoing \$120,000 sponsorship of the Bell Park Sport &amp; Recreation Club. This sponsorship will allow the club to be more financially secure and provide for a more traditional social club facility within the local community. Additionally, it will ensure the longevity of the club allowing it to maintain its lease with Council and seek more funding opportunities. Additionally, it will provide ongoing sporting facilities and opportunities for the local community.</p> <p>LOW to MODERATE BENEFIT</p>	
Closure of gaming room at Bell Park Sport & Recreation Club	<p>The closure of the gaming room and the removal of EGMs from this venue will provide a social benefit to the users of the club including those who are under the age of 18 years. The cessation of gaming at this venue will decrease access to gaming within the municipality and in the local area more broadly.</p> <p>LOW BENEFIT</p>	

Figure 17.2: Review of Economic Impacts of the Application

Likely Economic Impact <sup>s22</sup>			
	Economic Benefit		Economic Disbenefit
Investment in venue renovations	<p>If the application is approved there will be a total of approximately \$2 million investment to renovate the premises as a result of the proposed increase in EGMs.</p> <p>NEGLIGIBLE BENEFIT</p>	Lower spending at other gaming venues in Geelong	<p>Reduced weight given the competition objectives of the GRA.</p> <p>NEGLIBLE DISBENEFIT</p>
Increased competition	<p>This benefit carries some weight because competition is a relevant statutory purpose, especially given the mature Geelong market.</p> <p>NEGLIGIBLE BENEFIT</p>	Lower spending in, and job losses from, local (non-gaming) businesses (not attributable to problem gambling)	<p>Difficult to determine, however, may trigger innovation by or improvements in other venues.</p> <p>NEGLIGIBLE DISBENEFIT</p>
Additional gaming expenditure	<p>Additional new expenditure to the LGA of between \$447,349 and \$595,904 which is minor in the context of the overall local economy.</p> <p>NEGLIGIBLE BENEFIT</p>	Unintended spending from gambling, including problem gambling expenditure	<p>There is a potential disbenefit, albeit uncertain in size, in higher costs to health and service providers and lower spending on local goods and services. However this is mitigated as there is no net increase in the number of EGMs within the municipality and a net reduction in the number of gaming venues.</p> <p>NEGLIGIBLE DISBENEFIT</p>
Complementary expenditure	<p>Complementary expenditure is expected to be \$1.03 million in the first year. This provides some further stimulus to the local economy.</p>		

<sup>22</sup> Economic benefits must be considered in the context of the overall size of the economy of the City of Greater Geelong, which is currently valued at \$20.51 billion (economy.id.com.au/geelong)



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NEGLIGIBLE BENEFIT

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Additional employment	6 EFT positions across the venue.
	NEGLIGIBLE BENEFIT

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# 18. Conclusion

238. On balance, the 28 additional EGMs at the Fyansford Hotel will have a slightly positive net social and economic impact on the local community and more broadly with respect to the City of Greater Geelong.
239. The application will enable the Hotel to undertake further redevelopment works at a cost of approximately \$2 million to improve the facilities and provide new dining and function spaces further increasing their capacity to service the local community.
240. The relocation of machines from the Bell Park Sport & Recreation Club will result in the closure of that venue as a gaming venue further reducing the accessibility to EGMs within the local area and LGA more broadly.
241. The proposal will also provide for the following additional benefits:
- Provide additional employment (6 EFT positions, including 2.9 in the gaming room).
  - Ongoing sponsorship of the Bell Park Sport & Recreation Club of \$120,000 per year in perpetuity which will ensure the ongoing viability of the Club and allow them to enhance the overall offer at the venue through expanded social spaces and multi-function rooms and an expanded bistro.
  - \$1.03 million in additional complementary expenditure.
  - \$427,000 in increased supply and maintenance contracts.
242. It is acknowledged that there is the potential for some disbenefit associated with the application, such as a potential increase in problem gambling and harm to low to moderate risk gamblers. As this is an application for the relocation of existing EGMs that will result in the closure of the Bell Park Sport & Recreation Club as a gaming venue, provide sponsorship of the Club into perpetuity and move machines away from an area of greater disadvantage, we consider that risk for a potential increase in problem gambling is minor.
243. I am satisfied that these disbenefits are outweighed by the benefits associated with the application given that this is an existing venue, the top up of 28 EGMs is not expected to change the attractiveness of the venue, and the venue currently experiences low utilization and has a modest NMR which indicates there is little evidence to suggest problem gambling being a significant issue at this venue.
244. Accordingly, the proposal will result in a slightly positive impact on the local community. The application should therefore be supported.

# Appendix A Curriculum Vitae

## Hayley Vinecombe – Associate

### Qualifications:

Bachelor of Arts (Hons) in Geography, University of Auckland, 2002

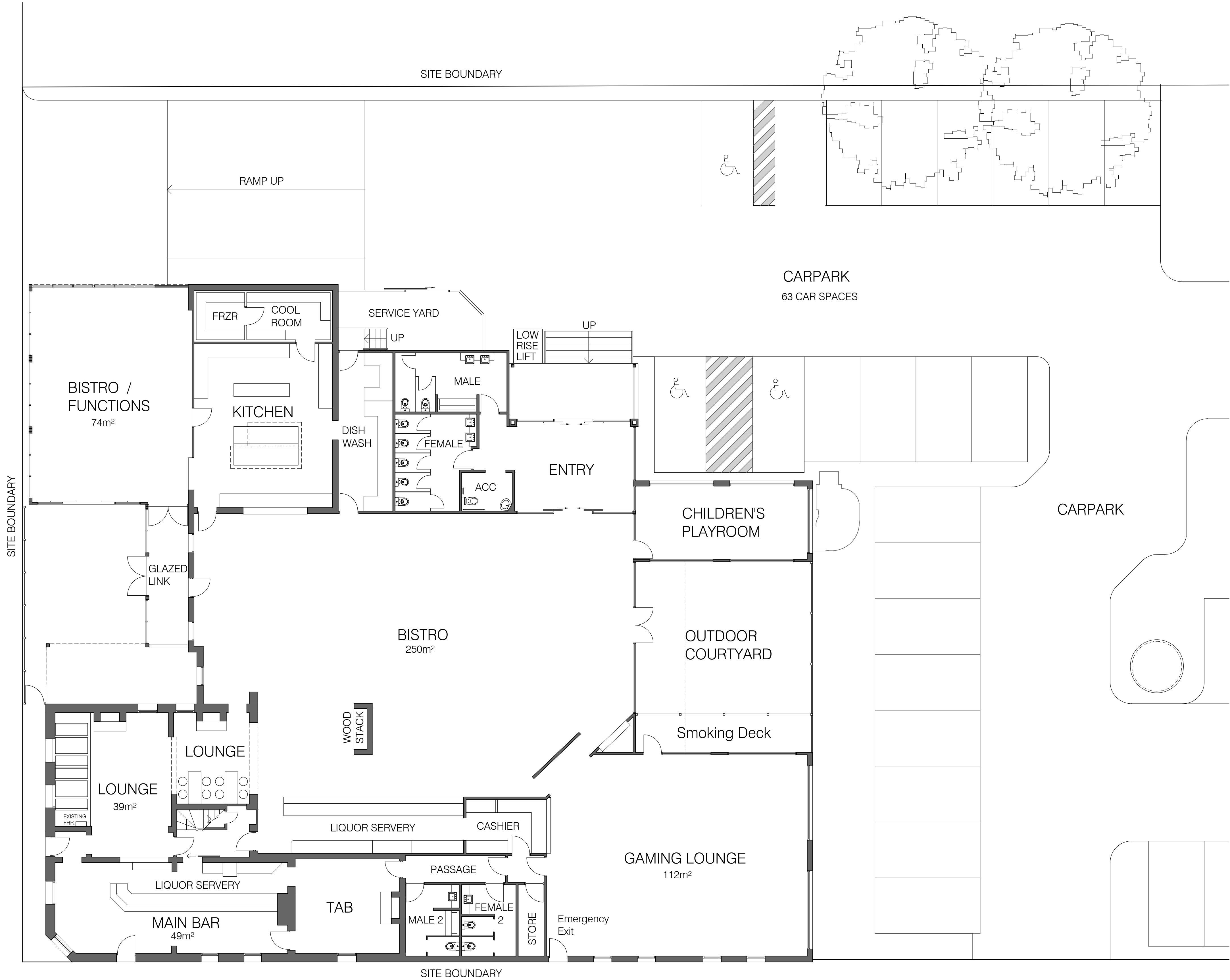
As a Social Geographer with a background in Transport Planning, Hayley Vinecombe began her career working in local government in New Zealand. After moving to Melbourne in 2005, Hayley continued her work in local government and state government with a specific focus on sustainable transport and the development of Green Travel Plans.

Hayley joined Ratio Consultants as a Social Geographer/Transport Planner in May 2008, having previously worked at another Melbourne based traffic engineering firm.

During her time at Ratio Consultants, Hayley has provided valuable assistance to both the Transport and Planning teams, developing expertise in a range of skills across both traffic and planning fields. Hayley has developed a broad range of statutory planning experience which is now her main area of focus with special interest in residential and child care developments and Social and Economic Impact Statements.

# Appendix B Existing Venue Layout

HAMILTON HIGHWAY



No	REVISION	DATE
DO NOT SCALE DRAWINGS FIGURED DIMENSIONS SHALL TAKE PRECEDENCE OVER SCALED MEASUREMENTS CONTRACTORS MUST VERIFY ALL DIMENSIONS ON SITE BEFORE COMMENCING ANY WORK OR MAKING ANY SHOP DRAWINGS		
HPArchitects		
PO BOX 2066 WATTLETREE ROAD LPO EAST MALVERN VIC 3144		
PH: 0439 973 899 admin@hparchitects.com.au © COPYRIGHT		
PROJECT FYANSFORD HOTEL 67 Hyland Street Fyansford		
DRAWING VCGLR SITE PLAN		
	SCALE @ A1	1:100
	DRAWN BY	MTV
	DATE	Apr. 2024
DRAWING No. 2406 - VCGLR 1/		REVISION

# Appendix C Venue Photos

Photo 1: View of Hotel from Hyland Street





Photo 2: Entrance to Hotel from carpark



Photo 3: Bistro





Photo 4: Main Bar



Photo 5: Lounge





Photo 6: Function Room



Photo 7: Courtyard





Photo 8: TAB



Photo 9: Gaming room





Photo 10: Children's play area





Photo 11: Bell Park Sport & Recreation Club bistro

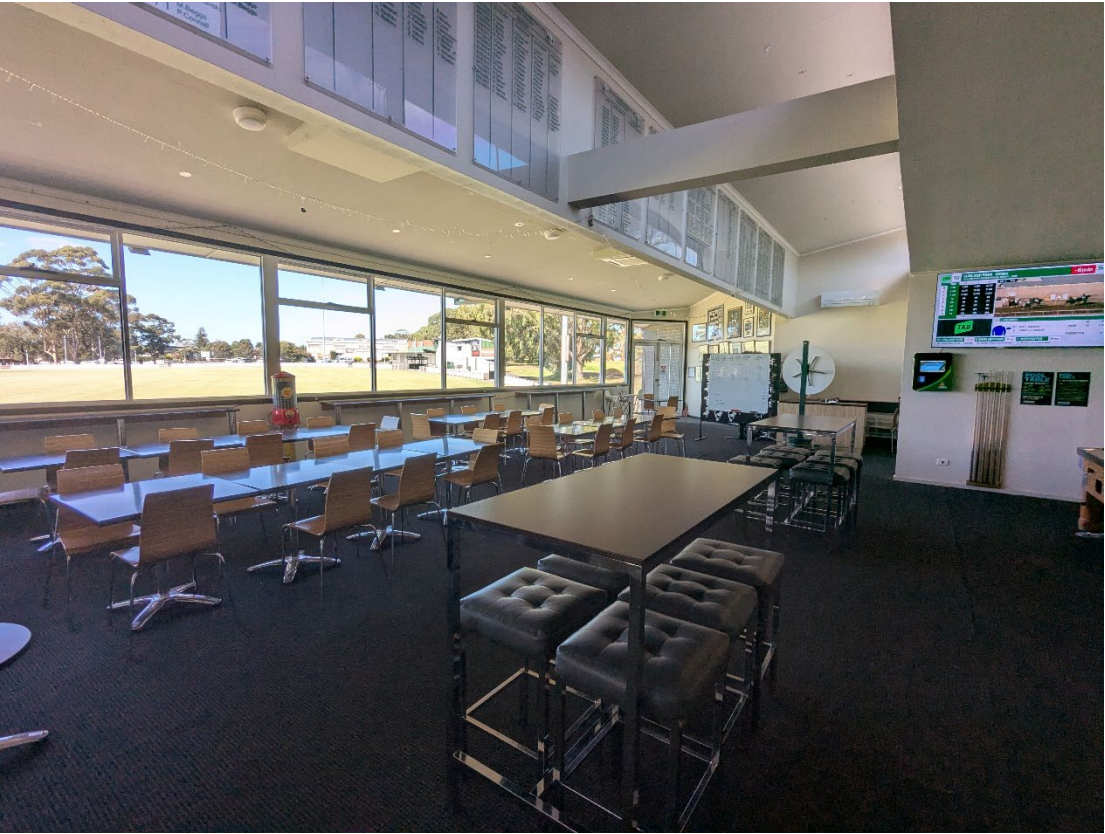


Photo 12: Gaming room entrance at Bell Park Sport & Recreation Club

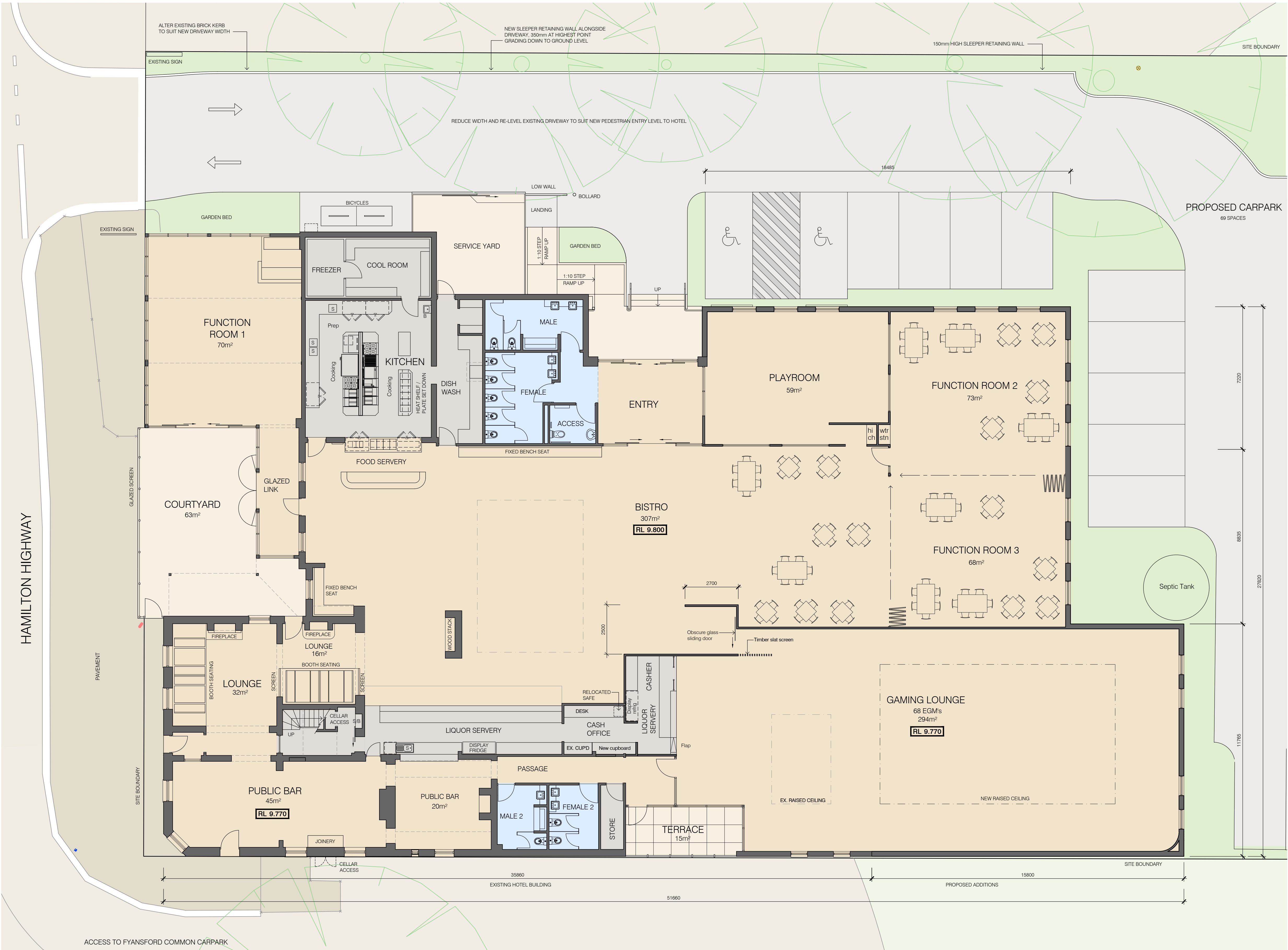


Photo 13: Gaming room at Bell Park Sport & Recreation Club



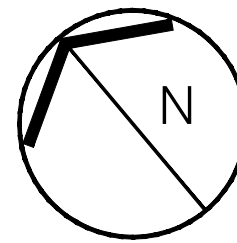


# Appendix D Proposed Development Plans



FLOOR AREA SCHEDULE	
EXISTING FLOOR AREA	
GROUND FLOOR	940m <sup>2</sup>
FIRST FLOOR	130m <sup>2</sup>
TOTAL	1070m <sup>2</sup>
GAMING LOUNGE	110m <sup>2</sup>
GAMING LOUNGE PERCENTAGE OF TOTAL FLOOR AREA	10.3%
PROPOSED FLOOR AREA	
GROUND FLOOR	1328m <sup>2</sup>
FIRST FLOOR	130m <sup>2</sup>
TOTAL	1458m <sup>2</sup>
GAMING LOUNGE	294m <sup>2</sup>
GAMING LOUNGE PERCENTAGE OF TOTAL FLOOR AREA	20.2%

NOTE:  
GAMING LOUNGE FLOOR AREA INCLUDES  
CASHIER, LIQUOR SERVERY AND CASH OFFICE



# Appendix E Summary Patron Surveys

## FYANSFORD HOTEL

[illegible]

**BELL PARK SPORT**

[illegible]