City of Greater Bendigo
Gaming Policy Framework –
“Accessible but not Convenient”

October 2007
Prepared by Coomes Consulting Group for the City of Greater Bendigo
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List of Abbreviations

ABS – Australian Bureau of Statistics
CBD – Central Business District
CBS – Community Benefit Statements
CSF – Community Support Fund
EGM – Electronic Gaming Machine
LGA – Local Government Area
VCGR – Victorian Commission for Gambling Regulation
VCAT – Victorian Civil and Administrative Tribunal
VPPs – Victorian Planning Provisions
1 Executive Summary

Context

Changes to the Victorian Planning Provisions on the 18th October 2006 require a planning permit be obtained for all new gaming machines in the State of Victoria. This document provides a planning framework and the strategic justification for a Local Gaming Policy for the City of Greater Bendigo, as it relates to applications for the installation or use of Electronic Gaming Machines (EGMs) in the municipality.

Gaming is a legitimate activity in Victoria and for the majority of gamblers gaming is a source of recreation. However, it is recognised that gaming can have serious detrimental implications for a small but significant proportion of gamblers.

Legislation

The legislative provisions governing the conduct of gaming are set out in a range of legislation, the most pertinent being the Gambling Regulation Act 2003 and the Planning and Environment Act 1987.

The main objective of the Gambling Regulation Act is to foster responsible gambling in order to minimise harm caused by problem gambling and to accommodate those who gamble without harming themselves or others.

There is limited legislative clarity or guidelines for what constitutes an appropriate location for a gaming venue; however, the proposed location of gaming venues and machines must be in accordance with the planning objectives for Victoria as set out in the Planning and Environment Act 1987. Any development should consider the social, environmental and economic impacts to ensure it will produce net community benefit and sustainable development.

The regulation of gaming is also influenced by State and local policy position on gaming. A review of State and Greater Bendigo policies has informed locational principles for gaming venues in the municipality.

Gaming in Victoria and the City of Greater Bendigo

In 2006, the State of Victoria had 29,647 EGMs in 522 venues, resulting in an overall density of 6.92 machines per 1000 adult population. Average annual expenditure on gaming machines per adult in Victoria was $630. There are 19 regions across Victoria capped at 10 machines per 1000 adults or the current level, whichever is the lower.

The City of Greater Bendigo is not a capped region and has 547 EGMs located within 10 venues. In 2006, the municipality had a higher overall density of 7.44 machines per 1000 adults compared with the State average of 6.92 per 1000 adults, yet a lower than average annual expenditure of $580 per adult compared to the State average of $630 per adult.
**Socio-Economic Implications – Research Findings**

Research has identified that disadvantaged communities are more vulnerable to the negative impacts of gaming. The tension that exists within gaming is that whilst it is a legitimate, and for many enjoyable, form of entertainment, any policy must address the community concerns regarding problem gambling that is evident in the research.

Whilst there is no simple causal relationship between problem gambling and gaming venue locations, there are a number of features that can make an individual and the wider community more vulnerable to the harm caused by gaming. These include accessibility, socio-economic disadvantage, marital status, gender, ethnicity, exposure to gaming venues and social context. The main trigger for the problems of most problem gamblers is financial loss which has a range of social and personal repercussions for the gambler and the wider community.

The location of gaming venues has been identified to correlate to the level of problem gambling. People who gamble at accessible venues (through co-location with other everyday activities where people congregate) are more likely to have higher expenditure, gamble more regularly and play for longer periods of time.

**Socio-Economic Implications – Planning Considerations**

The City of Greater Bendigo Planning Scheme encourages recreational and entertainment facilities to locate within activity centres. However, the Planning Scheme also prohibits the locating of gaming venues in strip shopping centres and shopping complexes, a common feature of most activity centres. Planning considerations state that entertainment uses should be located in accessible areas to promote sustainable development.

The resolution of these conflicting issues to produce a net community benefit suggests that gaming venues should have the attributes of ‘destination gaming’, but embody principles of sustainable development. To overcome this conflict, venues should be located proximate to; but not within the retail core of activity centres in the City of Greater Bendigo and located away from vulnerable communities.

**Locational Principles for Gaming**

Consideration of the legislative framework surrounding the location of gaming venues, when balanced with the key socio-economic and planning issues, has culminated the development of a set of locational principles for gaming venues. These principles focus on locating venues away from vulnerable communities where they will have negative impacts on that community and ensuring such venues are not convenient to the community; whilst supporting the fundamental principles of sustainable development and net community benefit.

Gaming venues should offer a range of services within the proposal and should also be located in areas where the community has a choice of recreational and entertainment options.
City of Greater Bendigo Local Context

The City of Greater Bendigo is a large regional centre; surrounded by various smaller townships located throughout the rural areas. It is experiencing considerable regional growth and is one of the fastest growing regional areas in the State.

The Bendigo CBD is the central focus of activity within the municipality and there is a need to plan for future entertainment and recreation options for the growing population.

The City of Greater Bendigo also has various pockets of disadvantage that are vulnerable to the harm caused by gaming.

Policy

This document provides a Local Policy suitable for inclusion into the Greater Bendigo Planning Scheme. There are also a range of planning tools including applicant requirements, an assessment tool for gaming venue applications and applicant evaluation of net community benefit. These tools will assist planners and applicants to better understand the new policy and complex planning and socio-economic issues involved in the location of gaming machines.
2 Introduction

In October 2006 the State Government of Victoria introduced amendments to the Victorian Planning Provisions which gave Councils decision making power over the location of electronic gaming machines (EGMs). Clause 52.28 ‘Gaming’ was amended (State Amendment VC39) to require a planning permit be obtained for all gaming machines. Previous as-of-right provisions for the installation of gaming machines were removed.

This document provides the strategic justification for a Gambling Planning Framework to provide the opportunity for the Greater Bendigo Council to respond to gambling as a planning concern. By increasing the planning control over gaming, Councils are able to influence the location of gaming machines and give consideration to the social and economic effects of new gaming machines.

Gaming is a legitimate activity in Victoria and for the majority of gamblers gaming is a source of recreation. However, gambling does have serious detrimental implications for a small but significant proportion of gamblers. The industry should be transparent, customers informed and policy adopted that mitigates the impacts on the community and increases the benefits of gaming.

In May 2007 the City of Greater Bendigo (COGB) engaged Coomes Consulting Group to develop a Gambling Planning Framework for the municipality. This document provides an evidence base for a Gaming Policy suitable for inclusions within the Greater Bendigo Planning Scheme. Section 7 of this document provide a policy suitable for inclusion into the planning scheme.

The methodology relied upon in preparing this policy is detailed in Attachment 1.
3 The Legislative Context to Gaming

This section provides the legislative context for gaming in Victoria. It discusses gaming as it relates to gambling and planning legislation at a State and local level.

The legislation and subordinate legislation discussed in this section sets the context in which decisions on the locations of gaming machines and gaming venues can be made. Operational provisions are not discussed in detail in this report.

The provisions governing the conduct of gaming are set out in the following legislation:

- Gambling Regulation Act 2003
- Planning and Environment Act 1987
- Local Government Act 1989
- Casino Control Act 1991
- Casino (Management Agreement) Act 1993
- Liquor Control Reform Act 1998

Statutory Rules and Directions:

- Ministerial Direction No. S277 18 October 2006
- Ministerial Direction No. S124 Thursday 26 June 2003
- VCGR Determination No. S 318 Monday 11 December
- Gambling Regulation Regulations 2005
- Gambling Regulation (Signage) Regulations 2005
- Gambling Regulation (Infringements Offences) 2006

3.1 The Regulation of Gaming (EGMs) in Victoria


The Gambling Regulation Act 2003 (‘the Gambling Act’) re-enacts and consolidates various laws relating to gambling in Victoria and establishes various powers and authorities on gambling.

The main objectives of the Gambling Act (under Section 1.1(2)) are:

(a) to foster responsible gambling in order to -

   (i) minimise harm caused by problem gambling; and
   (ii) accommodate those who gamble without harming themselves or others;

(f) to promote tourism, employment and economic development generally in the State.

The Act identifies that gambling has both positive and negative impacts on the community. The challenge for managing gaming is to produce a balanced
outcome by enabling gaming as a form of recreation while minimising the harm caused by problem gambling.

The Gambling Act states that premises suitable for gambling in Victoria must have one of the following licenses:
- a pub license
- a club license
- a racing club license

Therefore, appropriate venues for gaming are decided jointly by Consumer Affairs Victoria under the Liquor Control Reform Act 1998.

The Gambling Act establishes the Victorian Commission for Gambling Regulation (VCGR) (under Section 1.1 (3) (j)) to oversee the conduct of gambling in Victoria and gives it the power to grant or refuse an application for a gambling license. Approval is given to a premise for gaming under Division 2, Part 3, Chapter 3 of the Act.

Pursuant to Sections 3.3.6 and 3.4.19 of the Gambling Act, Council (as the “relevant responsible authority”) may make a submission to the VCGR on a gaming application and should address the social and economic impact of the proposed application on community wellbeing and on surrounding municipal districts.

The Gambling Act gives power to the Minister to give Directions to the VCGR on requirements for gaming machines which are set out in Section 3.2.3. Such matters include:
- the maximum permissible number of gaming machines available for gaming in the State;
- the maximum permissible number of gaming machines available for gaming in any approved venue in the State or a specified part of the State
- the proportion to be located outside the Melbourne Statistical Division;
- the proportion of machines to be placed in a premise with a pub license, club license or racing club license.

Section 3.2.4 of the Gambling Act further sets out the ministerial powers to determine regional areas and the regional limits permissible within them.

Taxation of gaming revenue is set out in Section 3.6.6 of the Gambling Act. A venue operator of an approved venue with a pub license must pay to the Commission 8.333% of total daily net cash balances, to be paid into the Consolidated Fund (Community Support Fund).

Each financial year, approved venues who received gaming revenue over that year are required to submit a Community Benefit Statement under section 3.6.9, which must state the percentage of gaming revenue applied for community purpose. Under the Act ‘community purpose’ is defined as an activity determined by the Minister under section 3.6.9(3) and can include matters such as sponsorships and employment expenses. Refer Attachment 2 for Ministerial Direction S124 (June 2003) on the activities that constitute community purpose.
Section 11.2.1 of the Act sets out the regulations relating to gaming machines and other matters that are authorised or required to be prescribed by the Gambling Act including display of time of day, lighting and external views, printed and electronic information and loyalty schemes. These matters are controlled under the Gambling Regulation Regulations 2005.

3.2 Planning

The Planning and Environment Act 1987 (the P&E Act) establishes a framework for planning the use, development and protection of land in Victoria in the present and long-term interests of all Victorians. The P&E Act establishes the content and regulation of planning schemes in Victoria and recognises the legal power of authority over various issues covered by the Act.

The most pertinent objective of the P&E Act with regard to the regulation of gaming machines and gaming venues are:

4. (1) (a) to provide for the fair, orderly, economic and sustainable use, and development of land;

(c) to secure a pleasant, efficient, safe working living and recreational environment for all Victorians and visitors to Victoria;

(g) to balance the present and future interests of all Victorians

In addition to these objectives, Section 4(2) (d) requires that consideration be given to the social and economic impact of the use and development of land.

Section 60 of the P&E Act sets out the matters a responsible authority must consider before deciding on a planning application. These include the relevant planning scheme and the objectives of planning in Victoria. Before deciding on an application the responsible authority may consider any significant social and economic effects of the use or development for which the application is made.

The P&E Act gives Council, as the responsible authority, the power to grant or refuse a planning permit for the installation or use of a gaming machine.

A planning scheme may set out policies and specific objectives under section 6(2) (a) without limiting the relevant State policy. A planning scheme may also regulate or prohibit the use or development of any land under Section 6(2) (b)
3.3 Subordinate Legislation and Directions

The legislative context is complemented by the following relevant directions and subordinate legislation:

3.3.1 Directions and Subordinate Legislation

- Ministerial Direction
  - Sets out key parameters for the maximum permissible number of gaming machines available for gaming in Victoria and operational controls

- VCGR Determination
  - Permissible number of gaming machines in capped areas in Victoria

- Ministerial Determination
  - Victoria Government Gazette - No. S124 Thursday 26 June 2003
  - Community Benefit Statements and what constitutes ‘community purposes’

- Gambling Regulation Regulations 2005
- Gambling Regulation (Signage) Regulations 2005
- Gambling Regulation (Infringements Offences) 2006

3.3.2 Planning Schemes

The location of gaming machines is further guided by the following provisions across Victoria.

State Policy and Provisions
The removal of former Clause 19.02 on gaming in October 2006 means there is no State policy for the regulation of gaming in planning schemes throughout Victoria.

The use of land for the purposes of gaming, like other land uses, is regulated by the State policies set out at Clauses 10-19 of the VPPs. These policies must be taken into account when making a decision under the planning scheme. Those policies that are relevant to the location of gaming machines in Victoria relate to the following key themes:

- Net Community Benefit and Sustainable Development
  - Clause 11.02 The goal of the State Planning Policy Framework seeks to ensure the objectives of planning in Victoria are fostered through appropriate land use and development planning policies and practices which integrate relevant environmental, social and economic
factors in the interests of net community benefit and sustainable development.

- **Entertainment and Recreation**
  
  **Clause 12.06-2** Increase access to the arts, recreational and other cultural facilities.
  
  **Clause 14.01** The objective of this clause is to ensure a sufficient supply of land is available for residential, commercial, industrial, recreational, institutional and other public uses.

- **Activity Centres and Sustainable Transport**
  
  **Clause 12.01-2** Develop a network of activity centres that are the focus for business, shopping, working, leisure and community facilities. Ensure activity centres are developed in such a way that reduce the number of private motorised trips by concentration of activities that generate high numbers of trips in highly accessible locations.
  
  **Clause 17.01** The objective of this clause is to encourage the concentrating of major retail, commercial, administrative, entertainment and cultural developments into activity centres (including strip shopping centres) which provide a variety of land uses and are highly accessible to the community.

- **Gaming**
  
  **Clause 52.28** Under this provision, a planning permit is required to install or use gaming machines. This provision was introduced in October 2006 as part of the State Amendment VC39. It creates a discretion which a local policy will inform.
  
  **Clause 52.28-1** The purpose of this Clause is:

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

  **Clause 52.28-4** A strip shopping centre is defined as an area that meets all of the following requirements:

  - it is zoned for business use;
  - it consists of at least two separate buildings on at least two separate and adjoining lots;
  - it is an area in which a significant proportion of the buildings are shops; and
• it is an area in which a significant proportion of the lots abut a road accessible to the public generally.

Clause 52.28-6 The decision guidelines state that before deciding on an application a responsible authority must consider:
• The State Planning Policy Framework and the Local Planning Policy Framework, including the Municipal Strategic Statement and local planning policies.
• The compatibility of the proposal with adjoining and nearby land uses.
• The capability of the site to accommodate the proposal.
• Whether the gaming premises provides a full range of hotel facilities or services to patrons or a full range of club facilities or services to members and patrons.

• Gaming - City of Greater Bendigo
Local Schedules to Clause 52.28 allow Council to specify local shopping complexes and strip shopping areas where gaming is prohibited.

Schedule to Clause 52.28-3
Gaming machines are prohibited in the following shopping complexes:
• Bendigo Marketplace - Mitchell Street, Bendigo
• Lansell Plaza Shopping Centre - High Street, Kangaroo Flat
• Strath Village Shopping Centre - Condon Street, Kennington

Schedule to Clause 52.28-4
Specified strip shopping centres. Under the City of Greater Bendigo planning scheme, this Schedule states “a gaming machine is prohibited in all strip shopping centres on land covered by this planning scheme”.

The relevant section of the Greater Bendigo Planning Scheme (Clause 52.28) is provided at Attachment 3.

3.4 State Government Policy Position

_Taking Action on Problem Gambling: A strategy for combating problem gambling in Victoria_ (2006) is the State Government’s 5 year strategy on problem gambling. It was published concurrently with Amendment VC39.

The _Taking Action on Problem Gambling_ strategy sets out a number of major initiatives and actions to be taken by Government including:
• Reviewing and extending regional caps to 19 regions (at 10 machines per thousand adults);
• Introducing a maximum EGM density of 10 machines per thousand adults by 2010;
• Researching the community benefit of “destination gambling”;
• Amending the VPPs to require a planning permit for the establishment of gaming venues.

The fourth action area of this strategy is entitled Protecting Vulnerable Communities which sets out the Government’s position on the locating of gaming machines in areas of low socio-economic areas. These areas are considered to be particularly at risk from the harm associated with problem gambling.

Government is committed to “effectively managing the distribution of gaming opportunities to better protect the communities most at risk from problem gambling” including the expanded regional caps.

The strategy relies on previous research and the recommendations of the Regional Caps Review Panel (2005) to commit to the further investigation of whether destination gaming can deliver community benefit to Victoria. The destination gaming model focuses on essentially providing fewer venues, but larger venues. These venues should be located in areas that are not convenient to the community to reduce the incidence of enticement.

Destination gambling is described as:
“a style of gambling that encourages pre-determined decisions to gamble”
(Taking Action on Problem Gambling, 2006)

This strategy recognises that further evidence is required to justify this recommendation but is supportive of the initial evidence available on destination gaming.

3.5 Local Policies and Provisions

This section reviews relevant policies and strategies (including those which have been adopted by Council and incorporated into the planning scheme) that inform that location of gaming venues.

3.5.1 City of Greater Bendigo Planning Scheme

• Municipal Strategic Statement
  Clause 21.03-2 The planning vision for the City of Greater Bendigo reflects the broad view and aspirations for land use planning and development for the municipality:

“To be a vibrant municipality that builds on the outstanding opportunities available for housing, commerce, tourism and industry. These opportunities combined with excellent community services and facilities, a unique natural environment, built and cultural heritage and a pleasant climate, will ensure
that Greater Bendigo maintains its status as a pre-eminent inland municipality in Victoria”

Clause 21.07 Economic Development
This Clause supports a well-established hierarchy of commercial centres. The Bendigo CBD plays a diverse shopping, business, tourism and recreation role, whilst centres lower in the hierarchy provide for various local and regional service needs. The Clause identifies the important social role played by Bendigo’s retail and commercial centres.

• Local Policy Planning Framework
Clause 22.27 The objectives of the Licensed Premises Policy are:
• To manage the future and existing development of licensed premises within the City of Greater Bendigo.
• To define the Entertainment Precinct and manage future and existing development.
• To manage location, patron capacity and hours of operation of licensed premises to protect the amenity of surrounding areas.
• To reduce the incidence of anti-social behaviour and the subsequent impact on the amenity of the area.

Under ‘location’ it states that it is policy that:
• The location of the licensed premises will not detrimentally impinge on residential properties.
• Cluster development of licensed premises will not be encouraged outside the Entertainment Precinct.
• New licensed premises will be discouraged from locating in a residential zone or within 100m buffer area from a residential zone.
• Extended hours for existing licensed premises in a residential zone or within 100 metre buffer areas from a residential zone will be discouraged.

3.5.2 Referenced Policies
Relevant policies incorporated into the planning scheme include:
- Council Plan 2005-2009
- City of Greater Bendigo Residential Development Strategy 2004
- Commercial Land Strategy 2005
- Bendigo CBD Plan 2005

The Council Plan 2005-2009 identifies broad strategic statements for the municipality. The Vision for the City of Greater Bendigo is:
‘A progressive and vibrant provincial capital, Greater Bendigo draws life and inspiration from its heritage, the unique Box-Ironbark Forest, the land and its people. We value the diversity and creativity of our urban and rural communities.’

The Bendigo CBD Plan and the Commercial Land Strategy both recommend that entertainment and recreation facilities be located within the centre of Bendigo.

The objectives of the Commercial Land Strategy are as follows:

- To ensure the most accessible and equitable distribution of retail and commercial floor space across the City for current and future residents.
- To provide a network of retail and commercial centres which is capable of absorbing new retail and commercial developments and is responsive to market demand.
- To provide a clear land use planning and development framework for each of the major activity centres in the City, recognising the need to encourage a diverse range of roles and to identify key development opportunities.
- To recognise the important social roles played by Bendigo’s retail and commercial centres to provide for the inclusion of further community facilities and services in these areas.
- To encourage a pattern for retail and commercial floor space provision which maximises the range of transport choices available to Bendigo residents for their movement within the City.

3.6 Local Policy Position

This section reviews relevant policies and strategies adopted by the City of Greater Bendigo that sit outside the Planning scheme.

Relevant policies adopted by Council include:
- Health and Wellbeing Framework 2003

This policy provides the key planning framework for health and wellbeing of the community. Greater Bendigo’s vision for health and wellbeing is:

*The City of Greater Bendigo recognises the significance of addressing physical, social and economic issues that impact on our community. Council is committed to being responsive to the needs and diversity of our community through the principles of equity, equality, access and participation. In doing so, Council acknowledges that health is a fundamental right irrespective of an individual’s social, political, economic or cultural characteristics and geographical location. Council is committed to creating and providing for a community that is safe, accessible and promotes both physical and social health*
3.7 Commentary

What is clear from a review of legislation, strategy and planning controls regarding gaming machines is that there is limited legislative clarity or guidelines for what constitutes an appropriate location for a gaming venue.

The legislative context seeks to protect vulnerable members of the community from the possibly harmful outcomes of gaming machines, whilst recognising the activity is legitimate form of recreation throughout Victoria.

From the above legislative review, the following broad conclusions can be drawn:

- The proposed location of gaming venues and machines must be in accordance with the planning objectives for Victoria, including securing a safe, pleasant working and recreational environment and balancing the present and future interests of all Victorians.
- Any development should consider the social, environmental and economic impacts to ensure it will produce:
  - Net community benefit
  - Sustainable development
- Gaming venues should not be located in:
  - Shopping complexes
  - Strip shopping centres
- Activity centres should be the focus for entertainment and leisure facilities.
- Entertainment uses and other uses which attract people are encouraged to locate with other uses in accessible areas to reduce the number of motorised trips made.
- Gaming venues should consider adjacent land uses.
- Gaming venues should consider the social and economic impacts of the proposed use.
- There is indicated support from State Government for a destination style of gaming (in *Taking Action on Problem Gambling*).
- There is support for locating gaming machines away from areas of socio-economic disadvantage.
- Local policy and legislation supports State legislation.
- The City of Greater Bendigo is committed to providing a safe, accessible, equitable and healthy community.
- Local policies support a hierarchy of commercial centres, with entertainment uses encouraged to locate within urban centres.
4 Applications of Gaming Machines – Victoria and Greater Bendigo

This section reviews how legislation and regulation have managed the implementation of gaming in Victoria and Greater Bendigo.

4.1 Victoria

4.1.1 Electronic Gaming Machine Numbers

State Ministerial Directions issued on the 18 October 2006 set the following parameters on Victoria’s gaming machine industry:

- The maximum number of gaming machines permitted in Victoria, other than the Melbourne Casino, is 27,500.
- The maximum permissible number of machines in any approved venue outside of the Melbourne Casino is 105 machines.
- The proportion of the 27,500 gaming machines to be located outside the Melbourne Statistical Division is to be not less than 20%.
- The proportion of the 27,500 gaming machines which may be placed in premises in respect of which there is a general licence under the Liquor Control Reform Act 1998 is 50%.
- The proportion of the 27,500 gaming machines which may be placed in premises in respect of which a full or restricted club licence is in force under the Liquor Control Reform Act 1998 or a licence is in force under Part 1 of the Racing Act 1958 is also 50%.
- The proportion of the 27,500 gaming machines which each gaming operator (Tabcorp and Tattersall’s) is permitted to operate is 50%.

In June 2006 the State of Victoria had a total of 29,647 EGMs. Of these, 2,500 are located at Crown Casino. A further 27,147 machines operate in 521 hotels and clubs throughout the State. The maximum amount of EGMs permitted in Victoria is 30,000 (2,500 of which are to be accommodated within the Melbourne Casino).

4.1.2 Regional Caps

Regional caps are a way of setting limits on the number of gaming machines that can be available for gaming in certain specified areas. The capped regions cover parts of the identified municipalities that are considered to be most at risk, based on a high level of disadvantage, significant density of EGMs and relatively high levels of EGM losses.

The first round of regional caps was introduced in 2001 in response to community concern about the high concentration of gaming machines in some local areas. Under the new regional caps policy introduced in 2006, nineteen regions are capped at either 10 machines per 1000 adults or the existing density of the region, whichever is lower.

The regional caps currently cover 19 regions:

- Ballarat, Banyule, Bass Coast, Brimbank, Casey, Darebin, Greater Dandenong, Greater Geelong (including Queenscliff), Greater Shepparton,
Hobsons Bay, Hume, Latrobe, Maribyrnong, Melbourne, Monash, Moonee Valley, Moreland, Warrnambool and Whittlesea.

**Figure 1: Capped Regions, Victoria**

At the same time as introducing regional caps, the State Government stipulated that the density of electronic gaming machines in all local government areas must not exceed 10 machines per 1000 adults by the year 2010. This will result in the removal of approximately 540 machines (*Regional Electronic Gaming Machine Caps Review Panel Final Report*, 2005).

This requirement has meant the removal of machines from some areas where this density is higher. Many areas with low densities of EGMs are experiencing significant increases in the number of applications for electronic gaming machines.

### 4.1.3 EGM Density

Established measures of the distribution and potential impact of EGMs include the density of EGMs compared to population and average expenditure figures. In 2006, there were 6.92 gaming machines per thousand adults in Victoria.

Using EGM density as an indicator of the potential impact conflicts with the destination gambling approach. This approach involves fewer venues, but larger venues; and therefore higher density in chosen locations rather than an ‘even spread’ across a larger area. Encouraging an even, low-density spread across a larger area can make gaming more accessible to more communities, which has a proven correlation to problem gambling (ANU 2004) (Refer section 5).

### 4.1.4 Gaming Expenditure in Victoria

Average annual expenditure on EGMs across Victoria was $630 per adult in 2006 (Refer to Table 1 below).
The Productivity Commission found that Australians are considered to be some of the heaviest gamblers in the world (Productivity Commission 1999). In 1998, 80-90% of Australians gambled during the year and 40% gambled regularly.

ABS data from 2005 on the gambling industry indicates that 56% of all gambling revenue comes from gaming machines, a total of $8 700 million. The gambling industry employed 76,848 people in Australia in 2005 (ABS).

Victorian gambling expenditure has grown at a phenomenal rate during the past decade. In particular, the five-year period ending in 1997-98 (which followed the introduction of EGMs and included the opening of the Crown Casino) saw expenditure as a percentage of household disposable income more than double (see Figure 2 below).

As seen in the figure below, growth in gambling expenditure has occurred concurrently with growth in expenditure on EGMs.

**Figure 2: Per capita gaming expenditure, Victoria: 1977-78 to 2002-03**

Gaming experienced a significant drop in popularity after the introduction of smoking bans in gaming facilities in September 2002. Expenditure on gaming machines fell by 8.9% between 2001/02 and 2002/03 (SA Economics 2005).

Growth in spending on gaming machines is increasing at a rate of approximately 1.9% per annum, a large decrease compared to 16% per annum in 1998-1999.
Table 1: Historical Data – Gaming Machines in Victoria

<table>
<thead>
<tr>
<th>Date</th>
<th>Adult population</th>
<th>No. of Venues</th>
<th>No. of EGMs</th>
<th>Net EGM expenditure</th>
<th>Average no. EGMs per 1,000 adults</th>
<th>Average no. adults per venue</th>
<th>Average net EGM expenditure per adult</th>
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</tr>
<tr>
<td>30/06/2002</td>
<td>3,679,669</td>
<td>534</td>
<td>27,400</td>
<td>$2,562,820,950</td>
<td>7.45</td>
<td>6,891</td>
<td>$696</td>
</tr>
<tr>
<td>30/06/2003</td>
<td>3,720,628</td>
<td>532</td>
<td>27,260</td>
<td>$2,334,294,514</td>
<td>7.33</td>
<td>6,994</td>
<td>$627</td>
</tr>
<tr>
<td>30/06/2004</td>
<td>3,816,854</td>
<td>530</td>
<td>27,132</td>
<td>$2,290,929,976</td>
<td>7.11</td>
<td>7,202</td>
<td>$600</td>
</tr>
<tr>
<td>30/06/2005</td>
<td>3,870,537</td>
<td>523</td>
<td>27,124</td>
<td>$2,393,030,966</td>
<td>7.01</td>
<td>7,401</td>
<td>$618</td>
</tr>
<tr>
<td>30/06/2006</td>
<td>3,924,728</td>
<td>521</td>
<td>27,147</td>
<td>$2,472,451,853</td>
<td>6.92</td>
<td>7,533</td>
<td>$630</td>
</tr>
</tbody>
</table>

Notes:
- Adult population - The projected adult population figures used in this table are sourced from the Department of Sustainability and Environment.
- Number of Venues - Only licensed venues with EGMs are reported in this table. Licensed venues with zero EGMs have been excluded from the total number of venues for each year so that they are not included when formulating the above averages.


4.1.5 Community Benefit of Gaming to Victoria

Gaming revenue contributed $91 million to the Community Support Fund in 2005/2006. 85% of this funding is returned to community wellbeing projects across Victoria (Department of Premier and Cabinet).
### Electronic Gaming Machine Numbers

In 2006, the City of Greater Bendigo had a total of 547 gaming machines accommodated in 10 venues. These venues are listed in the table below. Compared with State averages, the municipality had a higher concentration of EGMs per 1000 adults but a lower than average annual expenditure on gaming.

#### Table 2: Venues with EGMs in City of Greater Bendigo

<table>
<thead>
<tr>
<th>Name and Address</th>
<th>Date Opened</th>
<th>Type</th>
<th>No. EGMs</th>
<th>Operator</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bendigo District RSL Sub Branch</td>
<td>18/02/94</td>
<td>Club</td>
<td>81</td>
<td>Tattersall’s</td>
</tr>
<tr>
<td>73-75 Havilah Road Bendigo</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bendigo Club</td>
<td>16/01/93</td>
<td>Club</td>
<td>44</td>
<td>TABCORP</td>
</tr>
<tr>
<td>22 Park Street Bendigo</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>West Bendigo Sports and Entertainment Venue (Schweppes Centre)</td>
<td>28/01/94</td>
<td>Club</td>
<td>75</td>
<td>TABCORP</td>
</tr>
<tr>
<td>Marong Road Golden Square</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Borough Club</td>
<td>Not available</td>
<td>Club</td>
<td>40</td>
<td>TABCORP</td>
</tr>
<tr>
<td>2-4 High Street Eaglehawk</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Kangaroo Flat Sports Club</td>
<td>23/11/94</td>
<td>Club</td>
<td>48</td>
<td>TABCORP</td>
</tr>
<tr>
<td>Station Street Kangaroo Flat</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fortunes Bendigo</td>
<td>7/12/93</td>
<td>Club</td>
<td>100</td>
<td>TABCORP</td>
</tr>
<tr>
<td>171-183 McIvor Road Bendigo</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>City Family Hotel</td>
<td>19/05/94</td>
<td>Hotel</td>
<td>39</td>
<td>Tattersall’s</td>
</tr>
<tr>
<td>41-55 High Street Bendigo</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rising Sun Hotel</td>
<td>17/03/93</td>
<td>Hotel</td>
<td>35</td>
<td>Tattersall’s</td>
</tr>
<tr>
<td>84 Barnard Street Bendigo</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Shamrock Hotel</td>
<td>10/11/93</td>
<td>Hotel</td>
<td>45</td>
<td>TABCORP</td>
</tr>
<tr>
<td>Pall Mall Bendigo</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Windermere Hotel</td>
<td>17/03/93</td>
<td>Hotel</td>
<td>40</td>
<td>Tattersall’s</td>
</tr>
<tr>
<td>112 High Street Kangaroo Flat</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td></td>
<td></td>
<td><strong>10</strong></td>
<td><strong>547</strong></td>
</tr>
</tbody>
</table>
Figure 3: Existing Gaming Venues - City of Bendigo and Greater Bendigo
Existing Gaming Venues - Greater Bendigo
4.2.2 Regional Caps
City of Greater Bendigo is not a capped region. However, the universal caps do apply which allow a maximum of 10 gaming machines per 1000 adults. At 2006 population levels it would require another 152 EGMs before Greater Bendigo reached this universal cap.

4.2.3 EGM Density
In 2006, City of Greater Bendigo had a density of 7.44 EGMs per 1000 adults, higher than the state average of 6.92 per 1,000 adults. 

Table 3: EGM Density in Greater Bendigo 2006

<table>
<thead>
<tr>
<th>Adult Population (18+)</th>
<th>EGMs</th>
<th>Venues</th>
<th>EGMs per 1000 adults</th>
</tr>
</thead>
<tbody>
<tr>
<td>69,991</td>
<td>547</td>
<td>10</td>
<td>7.44</td>
</tr>
</tbody>
</table>

Source: ABS 2006, VCGR, 2007

Using table 3 above, densities have been broken down into more localised areas within the City of Greater Bendigo.

Table 4: Area Density of EGMs per 1000 adult in the City of Greater Bendigo 2006

<table>
<thead>
<tr>
<th>Suburb</th>
<th>No. EGMs</th>
<th>Adult Population 2006 (18+)</th>
<th>EGMs per 1000 adults</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kangaroo Flat, Big Hill</td>
<td>88</td>
<td>6518</td>
<td>13.5</td>
</tr>
<tr>
<td>Long Gully West Bendigo, Ironbark</td>
<td>156</td>
<td>3610</td>
<td>43.2</td>
</tr>
<tr>
<td>Strathdale</td>
<td>144</td>
<td>4226</td>
<td>34.07</td>
</tr>
<tr>
<td>Bendigo</td>
<td>119</td>
<td>4641</td>
<td>25.6</td>
</tr>
<tr>
<td>Eaglehawk, Sailors Gully</td>
<td>40</td>
<td>3707</td>
<td>10.7</td>
</tr>
<tr>
<td>East Bendigo</td>
<td>0</td>
<td>2,306</td>
<td>0</td>
</tr>
<tr>
<td>Flora Hill, Quarry Hill, Spring Gully, Golden Gully</td>
<td>0</td>
<td>9,482</td>
<td>0</td>
</tr>
<tr>
<td>Kennington</td>
<td>0</td>
<td>5,913</td>
<td>0</td>
</tr>
<tr>
<td>White Hills</td>
<td>0</td>
<td>2,568</td>
<td>0</td>
</tr>
<tr>
<td>Strathfieldsaye-Junortoun</td>
<td>0</td>
<td>5,287</td>
<td>0</td>
</tr>
<tr>
<td>Huntly-Ascot-Epsom</td>
<td>0</td>
<td>4,419</td>
<td>0</td>
</tr>
<tr>
<td>Maiden Gully</td>
<td>0</td>
<td>3,452</td>
<td>0</td>
</tr>
<tr>
<td>Golden Square</td>
<td>0</td>
<td>9,188</td>
<td>0</td>
</tr>
<tr>
<td>Jackass Flat, California Gully, North Bendigo</td>
<td>0</td>
<td>5,884</td>
<td>0</td>
</tr>
</tbody>
</table>


---

1 Calculated from 2006 Census population figures
Figure 4: Map of EGM Densities in Greater Bendigo
4.2.4 Gaming Expenditure in Victoria

Gaming expenditure in the municipality in 2005/06 totalled over $42 million, which resulted in an average expenditure of $580 per adult. This expenditure was lower than the State average of $630 a year, despite Greater Bendigo having a higher density of machines.

This may be due to the fact that in Bendigo, there are a higher number of EGMs accommodated in clubs and not hotels. Independent research has shown that gaming machines in hotels raise double the revenue of clubs (Livingstone 2006).

The table below outlines the details of gaming machine expenditure in the City of Greater Bendigo last year.

Table 5: City of Greater Bendigo, Gaming Machine Expenditure 2005-2006

<table>
<thead>
<tr>
<th>2006 Population</th>
<th>2006 Adult Population</th>
<th>Venue No.</th>
<th>EGM No.</th>
<th>Total Net Expenditure</th>
<th>Adult Population per venue</th>
<th>Net EGM expenditure per adult</th>
<th>EGM per 1000 Adult</th>
</tr>
</thead>
<tbody>
<tr>
<td>93,253</td>
<td>69,991</td>
<td>10</td>
<td>547</td>
<td>$42,686,737</td>
<td>6,999</td>
<td>$580</td>
<td>7.44</td>
</tr>
</tbody>
</table>

ABS, 2006, VCGR, 2006

4.2.5 Community Benefit of Gaming to Greater Bendigo

Some examples of Community Support Fund (CSF) funded projects in Greater Bendigo include:

- B-Central Youth Resource Centre, 2005 ($900,000)
- Long Gully Multi-purpose facility ($121,500)
- Bendigo Mobile Youth Centre ($30,000)
- Implementing the Bendigo +25 Community Plan ($150,000)
- Eaglehawk Recreational and Community Hub ($11,000)

In the 2005/06 financial year in Greater Bendigo, 22.7% ($9,684,636, over $7.5 million of which came from clubs) of net gaming revenue raised of over $42 million from the 10 clubs and hotels across the municipality was claimed for community benefit (Refer Table 6 below).

Currently all these venues also provide direct and indirect financial contributions to the Greater Bendigo community which range from financial contributions to free use of function rooms and subsidised meals for sporting and community organisations.
Table 6: Community Benefit Statement 2005-2006, City of Greater Bendigo
Number of CBS lodged: 10 - Clubs (6) and Hotels (4)
2005-2006 Net Gaming Revenue (NGR) - $42,686,738

<table>
<thead>
<tr>
<th>Community Benefit Statement Claims</th>
<th>Clubs</th>
<th>Hotels</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category 1 Employment Expenses</td>
<td>4,212,561</td>
<td>1,812,139</td>
<td>6,024,700</td>
</tr>
<tr>
<td>Category 2 Gifts of Funds</td>
<td>33,384</td>
<td>12,257</td>
<td>45,641</td>
</tr>
<tr>
<td>Category 3 Sponsorships</td>
<td>119,332</td>
<td>18,556</td>
<td>137,888</td>
</tr>
<tr>
<td>Category 4 Gifts of goods to the community</td>
<td>39,025</td>
<td>2,748</td>
<td>41,773</td>
</tr>
<tr>
<td>Category 5 Voluntary services provided to the community</td>
<td>492,869</td>
<td>-</td>
<td>492,869</td>
</tr>
<tr>
<td>Category 6 Volunteer expenses</td>
<td>2,522</td>
<td>-</td>
<td>2,522</td>
</tr>
<tr>
<td>Category 7 Activities subsidised</td>
<td>253,614</td>
<td>1,163</td>
<td>265,248</td>
</tr>
<tr>
<td>Category 8 Fixed assets provided</td>
<td>1,176,316</td>
<td>102,554</td>
<td>1,278,870</td>
</tr>
<tr>
<td>Category 9 Direct and Indirect costs</td>
<td>1,340,354</td>
<td>5,471</td>
<td>1,395,125</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>7,669,977</td>
<td>2,014,659</td>
<td>9,684,636</td>
</tr>
<tr>
<td>Percentage of NGR claimed for Community Purposes</td>
<td>22.69%</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Notes:
Category 1: Employment expenses include all-on costs except for payroll tax and fringe benefits tax. Training costs for staff, including gaming room staff, are also treated as employment expenses.
Category 2: Venue operators can only claim direct donations from gaming revenue as community benefits. Donations of vouchers are treated as donations of funds. Where venue operators conduct fundraising activities on behalf of charities or other community groups, they can only claim the labour component as a community activity.
Category 3: Venue operators may claim sponsorships paid from gaming revenue as community benefits.
Category 4: The amount claimable as a community benefit for the gift of new goods is the amount paid from gaming revenue by the venue operator, including GST. The amount claimable for gift of used or second-hand goods is the market value of the goods.
Category 5: This item covers voluntary services and the cost attributable to these services.
Category 6: The amount of the benefit is all costs incurred by volunteers in carrying out activities that the venue operator is entitled to claim as community benefits.
Category 7: The amount of the benefit is the difference between the commercial selling price and the selling price that the venue operator offers to the public.
Category 8: Expenditure on fixed assets in the last financial year, other than assets used for gaming purposes, can be included as community benefit.
Due to widespread community discontent with the Community Benefit Statement system, a review of the system was undertaken in 2007 by the Office of Gaming and Racing. The results of this study recommended that hotels no longer submit a CBS in light of their contributions to the CSF. Recommended changes to what constitutes a community purpose no longer include employment, rent, service costs or subsidised meals.

The Minister has made a commitment to adopt these recommendations. Therefore many benefits listed below will no longer be accepted as community purposes in 2008.
5 Key Social and Economic Issues Associated with Gaming (EGMs)

This section draws on current research on gaming and planning provisions to explore emerging concepts and discuss the dichotomy that exists between them in relation to gaming. It then considers how this may be resolved in the interest of net community benefit.

The tension that exists within gaming is that whilst it is a legitimate, and for many enjoyable, form of entertainment, any policy must address the community concerns regarding problem gambling that is evident in the research.

It is important that there is a balance between access for those who wish to gamble for recreation and the small but significant group for whom gaming causes harm to themselves, their family and friends and the broader community. It has been estimated that about 1% to 2.5% of Australian gamblers are problem gamblers; although the amount these gamblers lose is likely to be a much higher percentage of all gambling losses. Problem gamblers only make up a small component of gamblers, yet they account for 42% of all total player losses on gaming machines (PC 1999).

Research has also identified that disadvantaged communities are more vulnerable to the negative impacts of gaming (Livingstone 2006; Doughney 1999).

Location of gaming venues has been identified to correlate to the level of problem gambling. People who gamble at accessible venues (through co-location with other everyday activities where people congregate) are more likely to have higher expenditure, gamble more regularly and play for longer periods of time.

One of the challenges of developing a location based gaming policy is to establish in sufficient detail robust empirical evidence to support a particular policy provision. There is no simple causal relationship between problem gambling and gambling exposure. Problem gambling seems to be linked to a number of complex interactions between distance, exposure, accessibility and social context.

5.1 Research on Gaming and Location

Leading research that is relied on in this report includes:

- 2006 Australian Institute for Primary Care, La Trobe University (Livingstone, C.) *The Changing Electronic Gaming Machine (EGM) Industry and Technology* (“Livingstone 2006”)
- 2005 New Focus Research, *Experiences of Problem Gamblers, Their Loved Ones and Service Providers* (“New Focus 2005”)
- 2005 The SA Centre for Economic Studies, *Community Impact of Electronic Gaming Machine Gambling*
- 2004 Australian National University Centre for Gambling Research, *Gaming Machine Accessibility and Use in Suburban Canberra: A Detailed Analysis of the Tuggeranong Valley* (“ANU 2004”)
- 2002 Bendigo Community Health Services, *Gamblers Help Community Education Needs Analysis* ("BCHS 2002")
- 1999 Productivity Commission *Australia’s Gambling Industries*, ("PC 1999")
- 1999 Australian Medical Association *Submission to the Productivity Commission Inquiry into Australia’s Gambling Industry*
- 1997 Victorian Commission for Gambling Regulation (VCGR) *Impact of Electronic Gaming Machines on Small Rural Communities*

Refer to Section 10 - References for full reference titles and list of research.

The research supports a broad conclusion that discourages ‘convenience gambling’ and indicates that the emerging approach of ‘destination gambling’ is likely to reduce the socio-economic impact of gaming and to protect vulnerable communities.

The following key messages emerge from the above documentation:

- Problem gambling affects a small proportion of gamblers (PC 1999)
- People gamble for a variety of reasons, including reduction of boredom, isolation and loneliness; to win money; for excitement and entertainment and for social contact (PC 1999; New Focus 2005).
- For the majority of EGM gamblers, gaming is a form of enjoyable recreation and social contact (PC 1999; KPMG 1999).
- People are attracted to EGMs as a form of entertainment that provides contact in a non-confrontational and independent environment. Women gamblers in particular have reported that they feel safe accessing these venues alone, unlike other forms of similar entertainment (New Focus 2005).
- EGM usage, reasons for gambling and level of problem gambling vary between men and women (AMA 1999).

- Gaming machine venues can provide increased opportunities recreational and entertainment opportunities (the machines and also the other club and hotel facilities that are included in the facility); and increased opportunities for social contact.
- Gaming should be available to the majority of the population who see it as a form of enjoyable recreation, but vulnerable members of the community should be protected from the harm it can cause.
- Areas of socio-economic disadvantage are more vulnerable to problem gambling and the negative impacts of gaming (Livingstone 2006; AMA 1999; New Focus 2005)
- Whilst there is no typical profile of a problem gambler, there are a number of features that can make a person more vulnerable to problem gambling.
Evidence shows that the majority of known problem gamblers earn a lower than average income and are single (New Focus 2005; AMA 1999; PC 1999)

- The main trigger for most people becoming problem gamblers is financial loss which then has a range of social and personal repercussions for the gambler and the wider community (PC 1999). This may include the loss of a job, inability to pay loans or the loss of house.
- Problem gambling does not only affect the individual, but can have social implications for surrounding family and friends; which can resonate throughout the wider community (PC 1999; New Focus 2005).
- Problem gambling is considered an addiction and can have serious health implications (PC 1999)

- Hotel gaming machines earn approximately twice the amount of club machines in Victoria (revenue per machine) (Livingstone 2006; Market Solutions 1999)
- Club venues with gaming facilities are more reliant on gaming revenue than hotel venues with gaming facilities (Market Solutions 1999; ABS 2005)

- Economic impacts of gaming affect the individual and can be the catalyst for health and social implications (PC 1999)
- Gaming represents a net loss of revenue to local economies (KPMG 1999)
- There is a community benefit scheme in place to return some of the economic losses of gaming to the community but the system is not managed to have the best outcome for the community.

Implications for the location of gaming machines arising from the above are:

- Gaming machines can be a benefit to the community where they introduce a range of improved opportunities to entertainment and recreation. However, this must be balanced with the locational and demographic context of the area
- Convenient access to gaming machines can make the local community more vulnerable to problem gambling and negative impacts of gaming machines (PC 1999; ANU 2004; KPMG 1999)
- Gaming venues can ‘entice’ people to gamble in areas where people congregate for everyday activities (referred to as ‘convenience gaming’); and may cause harm to the community (ANU 2004; PC 1999)
- Research supports locating gaming machines in less convenient areas (PC 1999; Caps Review 2005)
- Research supports the concept of destination gaming as a way to ensure that people make a pre-determined decision to gamble (PC 1999; Caps Review 2005)
- Gaming revenue needs to be better regulated and targeted to produce a better financial outcome for the community from which the revenue is raised

The above research is examined in greater detail at Attachment 4.
5.2 Planning Considerations

There is a dichotomy between the locational influences on gaming and the factors underpinning sustainable development.

5.2.1 Sustainability

Sustainability and sustainable development are the overarching principles of planning in Victoria; that is, an integrated approach to ensuring the social, economic and environmental requirements of the present and future generations is considered. ‘Sustainable development’ is described as:

“Development which meets the needs of the present without compromising the ability of future generations to meet their own needs” (Melbourne 2030)

A key platform of sustainable development is the establishment of multi-purpose, highly accessible activity centres to reduce the number of individual motorised trips made, increased health and wellbeing through walkability and integrated public transport and enhancing interest and vitality in our centres.

5.2.2 Activity Centres

Under Clause 17.01 of the Greater Bendigo Planning Scheme, the objective of the activity centres policy is:

To encourage the concentration of major retail, commercial, administrative, entertainment and cultural developments into activity centres (including strip shopping centres) which provide a variety of land uses and are highly accessible to the community.

Clause 21.07 of the Bendigo Planning Scheme outlines a hierarchy of activity centres which is discussed in more detail in Section 7.2.3. These centres play a variety of roles within the local economy and community, depending on their size. Key policy objectives in relation to these centres are to maintain and enhance the economic competitiveness, performance and viability of the retail and commercial hierarchy in Bendigo and of centres within the hierarchy by seeking:

− To maintain the principal and diverse roles of the Bendigo CBD within the retail and commercial system by identifying opportunities for further development and new types of development.
− To ensure that the hierarchy provides regional level retailing and service activities to complement the primary role of the Bendigo CBD.
− To ensure that weekly shopping needs and the diverse retailing and service needs of suburban areas are addressed by a network of village centres.
− To ensure the effective provision of convenience retailing to meet the day to day needs of local residents, through a network of local and convenience centres and facilities.

As with the hierarchy of activity centres identified in Melbourne 2030, similar outcomes can also be applied to regional centres such as Bendigo. In Melbourne 2030 entertainment and recreation land uses are encouraged in principal and major activity centres, which can be equated to the Bendigo CBD and Centro Lansell precinct. These are likely to be more appropriate locations for large scale
entertainment facilities than smaller village and local centres where people undertake everyday activities.

5.2.3 **Entertainment and Recreation Land Uses**

Gaming is part of a suite of activities that can be characterised as recreation and entertainment. Recreation and entertainment can encompass a vast range of activities from golf and team sports to more sedentary and individual activities such as the cinema.

Not all recreation and entertainment can be accommodated in or adjacent to activity centres. Firstly, there are those recreation and entertainment uses which are land (or water) extensive or for which some other reason means they are unable to locate within an activity centre and as such are promoted as out of centre uses. For example, golf courses and football ovals.

The second and more common category is made up of those entertainment and recreation uses which involve congregations of people and are often located indoors. Gaming venues are in this category. Entertainment and recreation facilities under this stream are encouraged, through planning policy, to locate within activity centres to promote more sustainable communities.

Better access to entertainment activities is encouraged under Greater Bendigo Planning Scheme for all other types of entertainment.

5.2.4 **Retail**

Central to Activity Centres policy is the notion of retail. However, the planning policy at Clause 52.28 of the Greater Bendigo Planning Scheme specifically discourages gaming facilities to locate with areas given predominantly to retailing. It is a distinct conflict within the planning scheme that gaming, which is nested under the retail suite of land uses under Clause 75, is discouraged from co-locating with other ‘like’ land uses.

*SC Project Management v City of Nunawading & P Stoles & Ors 1992* was one of the first cases heard by the Administrative Appeals Tribunal early after the introduction of gaming machines to Victoria. The case involved the proposed location of a gaming venue (a tavern, bar, lounge and 90 gaming machines) within the Forest Hill Chase Shopping Centre. The critical issues considered included the adverse impact on shopping centre users and the compatibility of land uses.

In the absence of any provisions regarding accessibility and location of gaming venues, the Tribunal ruled that a permit should be granted and that the location of gaming venues in prominent locations such as shopping centres and [what we would now refer to as] activity centres was to be encouraged. The Tribunal held that,

“If gaming machines are to be considered legitimate and complementary entertainment facilities in our society, then it would appear preferable to locate them alongside a range of entertainment facilities in the major and dominant commercial centres in the City of Nunawading, rather than to relegate them to out-of-the-way centres”
5.3 Resolution of these issues in the interest of Net Community Benefit

Whilst the principles of destination gambling would rule out gaming venues being located within retail centres, strategic policy actively encourages entertainment uses to locate within such centres. Therefore, a distinct and balanced approach needs to be taken in order to address this conflict.

Gaming is not regulated in the same manner as other industries in relation to the importance of consumer protection, minimising potential “unethical activity” and reducing the risks and social and economic costs of problem gambling (PC 1999). Therefore it is no surprise that a locational approach to gaming venues will be complex and require careful consideration of the local context.

A combination of current research, legislative context and planning considerations has led to the conclusion that gaming should be located outside the retail core but with some accessibility to an activity centre and not in an area of socio-economic disadvantage, as defined by the SEIFA index and other relevant attributes such as income and education levels. In this sense, a gaming venue should be accessible to transport routes (to address sustainable development) but not convenient so that it is more likely that a gambler has made a predetermined decision to gamble.

The steps taken to reach this conclusion can be summarised as follows:

- Legislation seeks to ensure that all development is sustainable.
- The Greater Bendigo Planning Scheme and State Government policy through the SPPF encourages entertainment facilities to locate within activity centres.
- However, the scheme also prohibits the locating of gaming venues with retail facilities; specifically, strip shopping centres and shopping complexes common in activity centres.
- Research indicates that gaming should not be convenient and encourages the concept of destination gaming as a possible model for minimising the social and economic impact on vulnerable communities.

Therefore, gaming venues should have the attributes of destination gaming, but embody principles of sustainable development. To overcome this conflict, venues should be located proximate to; but not within the retail core of activity centres in Greater Bendigo.
6 Locational Principles for Gaming

Primary location criteria indicate the macro locational decisions to be made regarding where gaming machines should and should not be located. Detailed location criteria provide more specific direction as to appropriate sites within a local area, once the broad criteria have been satisfied.

Primary location criteria

1. Gaming machines should be proximate to, but not in the core of, higher order activity centres, particularly where entertainment is promoted as a policy objective.

2. Gaming machines can be located in areas remote from activity centres and a choice of transport modes if associated with a sports and recreation club with an extensive land holding.

3. Proposals for gaming machines should –
   a. not locate in areas of relative socio-economic disadvantage; and
   b. where relevant, make a positive contribution to the redistribution of gaming machines away from areas of socio-economic disadvantage.

4. Gaming machines should be located in areas which can accommodate additional gaming because:
   a. residents also have a choice of other types of entertainment and recreation facilities in the local area; and
   b. there are limited existing gaming opportunities for residents, or identified future residential growth capacity.

5. Gaming machines should not be located in a rural township if there are no alternative hotels or clubs without gaming in the town.

6. Proposals should demonstrate that the provision of gaming machines in a particular location will achieve a net community benefit.

Detailed location criteria

7. Proposals for gaming machines should be able to demonstrate that the chosen location could reasonably be perceived as a destination in its own right. This would be achieved by gaming machines and associated uses being separated from shopping centres, key public transport facilities and major community facilities involving a high concentration of people undertaking daily activities.

8. Gaming machines should not be convenient to shops.

9. Gaming machines and any associated recreation and entertainment facilities should not be located where these uses will be incompatible with the predominant surrounding land use.

10. It is preferred that gaming machines are located in venues which:
    – Have a range of other entertainment and leisure options;
− Make non-gaming social and recreational activities the primary purpose of the venue; and
− Limit their hours of operation.

6.1 Rationale for Principles

6.1.1 Shops

Principle 8: Gaming machines should not be convenient to shops

This principle is derived from one of the purposes of Clause 52.28 in the Victorian Planning Provisions (VPPs), which seeks to prohibit gaming machines in specified shopping centres and strip shopping centres. The aim of removing gaming venues from shopping centres has been an established part of State planning policy on gaming for some time. It is based on the idea of reducing accessibility to gaming in places people congregate to spend money for other purposes.

Principle 8 seeks to extend the basis for the statutory prohibition of gaming in shopping centres, that is, minimising convenient access to gaming, to include those areas which can be easily accessed from shops. As the Romsey Hotel Pty Ltd v VCGR 2007 Tribunal case showed, business areas not meeting the strict interpretation of a ‘strip shopping centre’ are potentially available for the location of gaming machines. There are likely to be instances when there is a fine line between whether land will be deemed to be in or outside a strip shopping centre. As such there is a need to make clear in any policy that those areas within easy walking distance of shopping centres are also not suitable for gaming, to minimise the incidence of convenience gaming. This will also ensure that shopping centres not scheduled in Clause 52.28 (perhaps because they are newly established) are given some policy protection.

6.1.2 Activity centres

Principle 1: Gaming machines should be proximate to, but not in the core of, higher order activity centres, particularly where entertainment is promoted as a policy objective.

Principle 2: Gaming machines can be located in areas remote from activity centres and a choice of transport modes if associated with a sports and recreation club with an extensive land holding.

Gaming is an unusual land use in that ‘gaming premises’ are situated under the retail use hierarchy in the VPPs, yet Clause 52.28 seeks to prohibit gaming machines in shopping centres. Normally entertainment uses are encouraged to locate in activity centres where they will achieve the greatest accessibility (Clause 17.01), but this does not sit comfortably with State gaming policy which essentially aims to reduce accessibility. It is this fundamental policy tension which Principle 1 seeks to resolve.

Research has concluded that proximity of gaming venues to places of community congregation influenced gambler behaviour. The Productivity Commission also found that there appeared to be a connection between greater accessibility to
gaming machines and greater prevalence of problem gambling. On this basis alone an isolationist approach to gaming would seem warranted.

However on the flip side, there are a number of reasons to support at least some level of accessibility for gaming venues. The Planning and Environment Act includes an objective to provide for the fair, orderly, economic and sustainable use and development of land. It is suggested that if gaming venues were to be located only in isolated locations, this negates any opportunity for multi-purpose trips and use of public transport. To do so would be neither fair (to those without a car), nor environmentally sustainable. As gaming is a legal recreation activity that is enjoyed responsibly by a vast majority of Victorians, it is considered important that measures to minimise the incidence of problem gambling do not completely undermine activity centre policy.

It is therefore considered that encouraging gaming machines to establish in edge of centre location provides for a balance between competing policy objectives. The key is that gaming venues should not be located in the core of an activity centre where the highest concentrations of people will be located and where convenience gaming could be encouraged (Principle 1).

Principle 1 also makes it clear that gaming venues should only located around activity centres where entertainment and recreation are encouraged by policy. This will protect lower order centres where it is likely to be less appropriate to locate gaming venues. Indeed ANU research concluded that in general terms, clubs which draw their patrons from a more localised catchment have patrons with heavier gambling profiles than those clubs with a wider reach into the surrounding area.

Finally Principle 2 recognises the reality that it is not feasible for all clubs to locate close to activity centres, as they may be associated with large recreation uses such as golf courses or ovals. In these cases such clubs should not be discriminated against in terms of location policy as these venues may in other respects be suitable for gaming. For example they are likely to be distant from other activities (a destination venue) and have a social and recreational focus which is not solely related to gaming.

6.1.3 Socio-economic disadvantage

Principle 3: Proposals for gaming machines should –
   a. not locate in areas of relative socio-economic disadvantage; and
   b. where, relevant make a positive contribution to the redistribution of gaming machines away from areas of socio-economic disadvantage.

It has been shown by various research that gaming machine consumption patterns correlate with measures of socio-economic disadvantage. This is the basis of the regional caps which have been introduced by the Government to ensure that gaming is less accessible to vulnerable communities.

Accordingly Principle 3 seeks to apply this thinking at a more local level by seeking to ensure that new gaming machines are not established in areas of disadvantage, and re-distributed away from areas of disadvantage. This is also in
keeping with the objectives of the *Gambling Regulation Act* which seeks to minimise harm caused by problem gambling.

6.1.4 Preferred macro locations

**Principle 4:** Gaming machines should be located in areas which can accommodate additional gaming because:

- residents also have a choice of other types of entertainment and recreation facilities in the local area; and
- there are limited existing gaming opportunities for residents, or identified future residential growth capacity.

**Principle 5:** Gaming machines should not be located in a rural township if there are no alternative hotels or clubs without gaming in the town.

It is considered advantageous to locate gaming machines in areas where there are a choice of entertainment options, which is less likely to occur in a local or neighbourhood centre. State planning policy on gaming following Amendment S58 has suggested that it is desirable that gaming venues provide a variety of facilities and services for patrons so that gaming is not the sole purpose of the venue. To extend this concept to a more macro level, Principles 4 and 5 encourage gaming to be considered as part of the broader entertainment and recreation offer in the area. This essentially promotes choice, so that residents have the opportunity to engage in social activities in their local area, without being exposed to gaming.

Consumer Affairs Victoria (CAV 2004a) believes there should be a range of transparent and fair consumer choice available to consumers in order for them to make balanced decisions regarding the expenditure of their money. This is particularly important in areas of lower socio-economic advantage and in isolated communities to ensure that they are protected from becoming vulnerable or disadvantaged consumers; therefore making ill-informed decisions on consumption, in this case – a non-benign form of consumption.

A range of entertainment options is particularly pertinent for growth areas and small communities with a limited range of recreation venues. A VCGR study (1997) of the impact of gaming machines on small rural communities found that entertainment and expenditure patterns changed after their introduction and there were an increased number of problem gamblers and bankruptcies.

However this is not a clear-cut issue. The same study noted some benefits to the introduction of EGMs into such towns, including the provision of a safe, accessible and non-discriminatory form of entertainment. Furthermore in the *Branbeau Pty Ltd v Victorian Commission of Gambling Regulation* 2005 case, the Tribunal stated that it was not aware of evidence that the impact of a new venue on problem gambling when residents already have good access to gaming opportunities. This was despite the VCGR arguing that the possibility that the risk of harm to problem gamblers or people at risk of becoming problem gamblers might be more likely to be increased by the opening of a new venue in a location which has been previously free from EGMs.
Nevertheless on the basis that gaming is not a benign form of recreation, it is considered a reasonable proposition that consumers have access to a choice of entertainment and recreation facilities, not just those associated with EGMs. The Productivity Commission also suggested that policy approaches need to be directed at reducing the costs of problem gambling through harm minimisation.

Principle 4 also directs gaming machines towards areas with limited existing gaming opportunities, or the population is likely to grow. This is premised on the theory that gambling consumption is higher in areas of high EGM densities, and is one of the drivers behind regional capping. It is recognised that the links between problem gambling and accessibility are not fully understood, although the Productivity Commission did find that “there is sufficient evidence from many sources to suggest a significant connection between greater accessibility – particularly to gaming machines – and the greater prevalence of problem gambling.” But taking a precautionary approach it would seem more appropriate, subject to other principles, to direct new gaming machines towards areas which can absorb additional gaming machines, rather than to areas with an already high concentration of gaming machines.

### 6.1.5 Destination gaming versus convenience gaming

Ideal Principle 7: Proposals for gaming machines should be able to demonstrate that the chosen location could reasonably be perceived as a destination in its own right. This would be achieved by a relative separation from other major land uses and key public transport facilities involving a high concentration of people undertaking daily activities.

This principle relates to some of the earlier principles which sought to reduce opportunities for convenience gaming. However Principle 7 makes this issue more explicit and applies it to any location, not just around shops and activity centres.

Again this pertains to the theory that destination gambling, that is, making a pre-determined decision to gamble, is more likely to encourage gambling as a legitimate recreational activity. State Government policy as set out in *Taking Action on Problem Gambling* foreshadows that destination gambling is seen as a possible direction for future policy. In any event, research by the ANU found that proximity of gaming venues to places of community congregation influenced gambler behaviour. As with shopping centres, separating gaming machines from other major land uses where people concentrate in daily activities, such as railway stations, will also minimise the likelihood of convenience gaming.

### 6.1.6 Net community benefit

Ideal Principle 6: Proposals should demonstrate that the proposal will achieve a net community benefit.

Gaming involves both positive and negative impacts upon local communities. This is recognised by the *Gaming Regulation Act* which requires the VCGR to consider the net social and economic impacts when considering approval of a premises suitable for gaming. Given the dual planning permit and gaming license approval system that now operates, it is appropriate that councils also consider issues of
net community benefit to ensure both sides of any socio-economic assessment are examined. In particular there will be a need for applicants to explicitly outline what benefits will flow to the community from any proposed gaming machines to ensure that this matter can be properly assessed.

6.1.7 Compatibility with surrounding land uses

**Principle 9:** Gaming machines and any associated recreation and entertainment facilities should not be located where these uses will be incompatible with the predominant surrounding land use.

Although gaming machines themselves do not cause external amenity impacts, gaming premises are encouraged through State policy to co-locate with other complementary activities. Therefore it is likely to exacerbate the potential for problems at the interface between gaming venues and surrounding land uses. The Greater Bendigo Planning Scheme already contains a Licensed Premises Policy that seeks to manage licensed premises and this will be an important policy tool which should be used in conjunction with any Gaming Policy to ensure an integrated approach to managing the range of uses likely to occur in a gaming venue.

6.1.8 Preferred attributes of gaming venues

**Principle 10:** It is preferred that gaming machines are located in venues which:

− Have a range of other entertainment and leisure options;
− Make non-gaming social and recreational activities the primary purpose of the venue; and
− Limit their hours of operation.

Principle 10 suggests that gaming machines should preferably be located in venues that have particular attributes to minimise opportunities for problem gambling.

Research (Livingstone 2006) has suggested that certain types of venues are more likely to have the characteristics of low risk venues in terms of levels of EGM consumption. These attributes include small club venues with a relatively small numbers of EGMs, modest activity levels whether measured by the value of EGM consumption or the proportion of time EGMs are in use, and some definite social or recreational purpose other than gambling. It is considered problematic to set a maximum number of EGMs as the State has already regulated this matter (105 EGMs per venue) and the appropriate number of EGMs for any given location is likely to be a function of other factors such as levels of disadvantage, contributions to the community and EGM density in the area.

It is also inappropriate to specifically distinguish between hotels and clubs as there are State regulations for an overall 50/50 split of EGMs between hotels and clubs across Victoria. Nevertheless, given that Clause 52.28’s objectives include ensuring that gaming machines are located in appropriate premises, there is a case to be made for ensuring that gaming is not a primary function in that premises and there are a range of other activities to engage patrons. Furthermore limiting hours of operation to avoid 24 hour gaming will assist in
ensuring gaming machines are not available at times when other recreation opportunities are closed.
7 Greater Bendigo Local Context

To apply the legislative context and research on principles of this strategy to the circumstances of Greater Bendigo, it is necessary to briefly appreciate the local context and direction foreshadowed to the area. The local context has been derived from local policies and strategies and relevant social research. It is arranged under two sections:
- Socio-Economic Profile
- Urban Development Trends

7.1 Greater Bendigo Socio-Economic Profile

7.1.1 Age Structure
The median age within Greater Bendigo is 37 which is the same as the median age for Victoria and lower than the rural median age of 41. Median ages are considerably lower within Flora Hill (27), Strathfieldsaye (31), Epsom (30) and Jackass Flat (29). The age profile is considerably higher within Heathcote where the median age is 51 and the proportion of the population aged over 65 is 26% which is nearly twice as high as the Victorian figure of 13.6%.

7.1.2 Income
Overall, incomes within Greater Bendigo are lower than the state and rural averages. The median weekly household income of $833 is considerably lower than the rural average of $1020 as well as the state average of $1022. The median weekly individual income of $403 is are also below the rural average of $441 and the state average of $456.

Incomes are particularly low within the urban north and rural east. Median weekly household incomes within Long Gully ($589), Eaglehawk ($666), North Bendigo ($696) and California Gully ($628) in the urban north and Elmore ($602), Heathcote ($549) in the rural east all have incomes that are over one third less than state and rural averages.

However, there are also areas that have relatively high incomes within Greater Bendigo. The townships of Junortoun, Strathfieldsaye, Epsom, Ascot, Maiden Gully and Jackass Flat all have median household incomes above state and rural averages.

7.1.3 Unemployment
The unemployment rate within Greater Bendigo of 6.5% is over twice as high as the state unemployment rate of 3.2%. Unemployment rates within nearly all suburbs and townships in Greater Bendigo are above average. Unemployment is particularly high within Long Gully (12%), Heathcote (10%), Marong (10%) and California Gully (10%) where rates are over three times higher than the state average.

7.1.4 Education
The level of education attainment within Greater Bendigo is also relatively low. The proportion of the population who have completed year 12 or equivalent is 33.7% which is over 10% lower than the state figure of 44%. Educational attainment is considerably lower within West Bendigo, Long Gully, Huntly,
Eaglehawk, Sailors Gully, Heathcote and Elmore where the proportion of the population who have completed year 12 or equivalent is less than 25%.

7.1.5 **Housing Costs**

Although overall housing costs within Greater Bendigo are not higher than average, the median monthly housing loan repayment is higher than the rural average of $1083 within Epsom ($1300), Strathfieldsaye ($1283) and Jackass Flat ($1246). High housing costs can often place considerable financial stress on families and individuals.

7.1.6 **Disadvantage**

*‘Dropping off the Edge’* is a study conducted by Professor Tony Vinson for the Jesuit Social Services that maps the levels of social disadvantage across Australia. The study is based on indicators based around social distress, health, community safety, economic issues and education. The information provided was combined to calculate a weighted score for each postcode and the 40 highest postcodes were then ranked from band 1 (most disadvantaged) to band 6 (least disadvantaged).

Of the 40 highest ranking postcode areas for Victoria **two postcode regions** were located within the City of Greater Bendigo. Postcode 3523 which includes Heathcote was classified as a Band 1 and postcode 3556 which includes Eaglehawk, California Gully, Jackass Flat and Sailors Gully was classified as a Band 3. These classifications indicate there is significant disadvantage within these areas.

The Index of Relative Socio-Economic Disadvantage (SEIFA) is another method used to indicate disadvantage. SEIFA is derived from attributes such as low income, low educational attainment, high unemployment, jobs in relatively unskilled occupations and variables that reflect disadvantage rather than measure specific aspects of disadvantage (e.g. Indigenous and Separated/Divorced). The average SEIFA index for Australia is 1000. Areas which are above 1000 are considered relatively less disadvantaged, while areas which are below 1000 indicate areas of relatively greater disadvantage (ABS, 2001).

According to SEIFA 2001, the City of Greater Bendigo is relatively disadvantaged with a SEIFA score of 990. However there are significant pockets of disadvantage located within the municipality. The urban north in particular has low SEIFA scores with the Long Gully/West Bendigo/Ironbark region as well as the North Bendigo/California Gully/Jackass Flat region both having SEIFA scores below 900. (refer table 7 and figure 5 below)

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3 The Dropping off the Edge Report was based on 2001 Census data
### Table 7: SEIFA Index of Relative Disadvantage - Greater Bendigo Areas

<table>
<thead>
<tr>
<th>Suburb</th>
<th>SEIFA Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bendigo</td>
<td>1,001</td>
</tr>
<tr>
<td>East Bendigo</td>
<td>986</td>
</tr>
<tr>
<td>Flora Hill, Quarry Hill, Spring Gully, Golden Gully</td>
<td>1,028</td>
</tr>
<tr>
<td>Kennington</td>
<td>1,032</td>
</tr>
<tr>
<td>Long Gully, West Bendigo, Ironbark</td>
<td>880</td>
</tr>
<tr>
<td>Strathdale</td>
<td>1,064</td>
</tr>
<tr>
<td>White Hills</td>
<td>962</td>
</tr>
<tr>
<td>Strathfieldsaye-Junortoun</td>
<td>1,087</td>
</tr>
<tr>
<td>Huntly-Ascot-Epsom</td>
<td>1,028</td>
</tr>
<tr>
<td>Maiden Gully</td>
<td>1,051</td>
</tr>
<tr>
<td>Kangaroo Flat, Big Hill</td>
<td>949</td>
</tr>
<tr>
<td>Golden Square</td>
<td>982</td>
</tr>
<tr>
<td>Eaglehawk, Sailors Gully</td>
<td>947</td>
</tr>
<tr>
<td>Heathcote- Rural East</td>
<td>979</td>
</tr>
<tr>
<td>Marong – Rural South West</td>
<td>1053</td>
</tr>
<tr>
<td>Elmore-Rural North</td>
<td>1003</td>
</tr>
<tr>
<td>North Bendigo, California Gully, Jackass Flat</td>
<td>899</td>
</tr>
<tr>
<td>Greater Bendigo</td>
<td>990.4</td>
</tr>
<tr>
<td>Victoria</td>
<td>1016</td>
</tr>
<tr>
<td>Australia</td>
<td>1000</td>
</tr>
</tbody>
</table>

Source: ABS, 2006
Figure 5: SEIFA Maps – City of Bendigo and the Greater Bendigo Region
7.1.7 Summary
The City of Greater Bendigo exhibits some of the characteristics of a community vulnerable to the impact of gaming. Indicators that make a community more vulnerable to the negative impact of gaming that are evident within Bendigo are:
- Areas of socio-economic disadvantage; including lower incomes and high unemployment and isolated or disconnected members of the community (Livingstone 2006; PC 1999)
- Areas of financial stress; including housing stress and high mortgage rates (PC 1999; VCGR 1997)

7.2 Urban Development Trends

7.2.1 Greater Bendigo is experiencing considerable regional growth
The Bendigo Residential Development Strategy states that Greater Bendigo has an annual population growth rate of 1.4% from 1986-2001 which is one of the highest population growth rates of any Victorian regional area. It predicts that the Greater Bendigo population will increase by between 38,000 and 45,000 people between June 2001 and June 2030.

7.2.2 The Urban Growth Boundary defines where growth will occur
The Residential Development Strategy (2004) states that development will occur within the urban growth boundary at:
- Huntly
- Jackass Flat
- Maiden Gully North East
- Strathfieldsaye
- Kangaroo Flat South Regional Centre
- A satellite development had been identified in the rural town of Marong which lies outside the Urban Growth Boundary

7.2.3 Greater Bendigo is made up of the CBD and various village and neighbourhood activity centres and a range of small townships located throughout the rural areas
The Commercial Land Strategy (2005) identifies a four tier activity centre hierarchy which consists of the following:

1. **Central Business District (CBD) which includes the Bendigo Market Place**
2. **Regional Centre**
   - Centro Lansell Precinct
3. **Village Centres**
   - Eaglehawk
   - Strath Village Precinct
   - Kangaroo Flat
   - Golden Square Precinct; and
   - Strathfieldsaye.
   - Epsom
   - Maiden Gully
4. **Local Centres**
7.2.4 Entertainment and Recreation will be encouraged to locate within the CBD

The Bendigo CBD Plan (2005) and the Commercial Land Strategy (2005) both recommend and aim to ensure that the CBD maintains its role as the highest order activity centre for retail, commercial, professional, hospitality, tourism and entertainment services. Entertainment and Recreation will predominantly be located within the Entertainment and Recreation precinct of the CBD as identified under Bendigo CBD Plan (2005). Refer Attachment 6.
8 Strategy and Policy Recommendations

8.1 Opportunities to influence gaming outcomes through local policy

A local planning policy cannot influence all aspects of Council’s approach to gaming in the way that a more generic Council policy on gaming might seek to. For example local government gaming policies often look at issues of advocacy or provision of problem gambling services in the municipality.

It is considered that it would be reasonable, under the parameters of the Victoria Planning Provisions, to seek to influence the following matters through a local gaming policy:
- Location of gaming machines in relation to other land uses and infrastructure.
- Distribution of gaming machines in a municipality.
- Socio-economic impact of and net community benefit arising from gaming machines.
- Uses associated with gaming venues
- Amenity issues.
- Application requirements.

On the basis of existing State gaming regulations it is considered problematic to seek to influence the following matters:
- Proportion of EGMs in clubs and pubs.
- Prohibiting additional EGMs in a specific geographic area.
- Specific venue or EGM design features (such as location of ATMs, spin rates and so on).
- Advertising of gaming.

Other gaming matters which are likely to be considered outside the scope of the planning system are:
- Specific management of gaming venues on Council land.
- Requiring specific contributions to community projects or services.

In relation to managing or directing community contributions, this is an issue about which it is unclear whether a Council would be successful in regulating this issue through the planning system. Net community benefit is clearly a goal of the planning system and it can be argued that in order to determine this then a responsible authority will need to take account of the community benefits and contributions made by a gaming proponent. On the other hand it would probably be inappropriate for planning permits to require what would effectively be a development contribution to specific projects. A possible compromise could be that if the permit applicant has sought to ‘pledge’ a specified amount per year towards community organisations, a permit condition which requires that pledge to be secured might be feasible (see Section 9.4).
8.2  Strategy recommendations

Clause 21.07 Economic Development

Clause 21.07-2 Objectives
Commercial

Insert:
- To ensure entertainment and recreation uses, including gaming machines, are located to meet local needs and minimise any potential harm to the community.

Clause 21.07-3 Strategies
Commercial

Insert:
- Appropriately locate gaming machines and associated entertainment and recreation uses by having regard to the overall hierarchy of centres, links to land uses within and around centres, the availability of other entertainment and recreation options, socio-economic implications and the impact on amenity.

Clause 21.07-4 Implementation
Policy and the exercise of discretion

Insert:
- Using local policy to ensure gaming machines are located in accordance with the criteria set out in Policy 22.xx Gaming.
- Prohibit gaming in strip shopping centres and shopping complexes under the provisions of Clause 52.28.

Clause 21.10 Reference Documents
Economic Development

Insert:
8.3 Draft Policy

Policy 22.xx Gaming
This policy applies to all applications which require a permit to install or use a
gaming machine pursuant to Clause 52.28 of this Planning Scheme, or use land
for the purpose of gaming in the City of Greater Bendigo.

22.xx-1 Policy Basis
Gaming is a legitimate entertainment and recreational activity in Victoria which the
majority of gamblers enjoy without harm to themselves or others, but which can
have serious implications for a small but significant proportion of gamblers. It is a
state wide imperative to minimise harm caused by problem gambling.

It is recognised that the complex interactions between distance, exposure,
accessibility and socio-economic status and the links with problem gambling are
not fully understood. Using the precautionary principle to guide the location of
gaming venues is in line with community expectations that action must be taken to
reduce harm from problem gambling. Gaming venues should therefore be located
away from core activity centres and areas of socio-economic disadvantage
making them less accessible to vulnerable communities.

This policy implements the objectives of Clause 21.07 of the MSS by setting out
how and where gaming venues should be sited in Greater Bendigo.

22.xx-2 Objectives
− To discourage new gaming machines in disadvantaged areas.
− To ensure the location of gaming machines and design and operation of
facilities containing gaming machines minimise opportunities for
convenience gaming and the incidence of problem gambling.
− To ensure that gaming machines are located where the community has a
choice of non-gaming entertainment and recreation activities within the
venue or in the local area.
− To protect the amenity of existing uses surrounding gaming venues.

22.xx-3 Definition
Convenience gaming – Impulse gaming resulting from gaming machines located
where large numbers of pedestrians are likely to pass in the course of their daily
activities, increasing the likelihood of spontaneous decisions to play electronic
gaming machines.

22.xx-4 Policy
General
Subject to the location criteria below it is policy to:
− Plan the location of gaming venues as part of the overall entertainment and
recreation offer in Greater Bendigo.
− Ensure that gaming machines are ancillary to other complementary
recreation and entertainment uses and established in venues which:
  ▪ Have a range of entertainment and leisure options;
  ▪ Offer social and recreational opportunities other than gaming as
the primary purpose of the venue;
• Have gaming floor area of less than 25% of the total floor area of the venue; and
• Do not allow for 24 hour a day operation.
  – Require applications to be advertised in the local paper in accordance with Section 52 of the Planning and Environment Act.

**Location**

It is policy that proposals for gaming machines are assessed against the following criteria and have regard to the strategic location factors shown on the plan attached to this policy.

Primary location criteria broadly set out appropriate and inappropriate areas for gaming machines. Once these have been satisfied the detailed location criteria provide more specific direction as to whether a site is appropriate in relation to its more immediate surrounds

**Primary location criteria**

Gaming machines should not be located:

– In areas of above average socio-economic disadvantage as defined by the SEIFA index of relative disadvantage and shown on the map attached to this policy.
– In a rural township if there are no alternative clubs or hotels without gaming in the township.

Subject to meeting the criteria above, it is preferred that gaming machines are located:

– Proximate to higher order activity centres shown on the map attached to this policy. This does not apply to a sports or recreation club with a land holding of more than 2 hectares.
– In suburbs or townships where there is a reasonable choice of alternative non-gaming entertainment and recreation facilities available in that suburb/township or proposed within 12 months. Alternative non-gaming entertainment and recreation facilities are hotels, clubs, cinemas, restaurants, bars and indoor recreation facilities operating at the times the proposed gaming venue will operate.
– Where additional gaming can be accommodated because:
  a) the total density of gaming machines in that suburb and its adjoining suburbs is less than the regional Victorian average; or
  b) the gaming machines are located in a future residential growth area as set out in the Municipal Strategic Statement or the map attached to this policy.

**Detailed location criteria**

Gaming machines should not be located:

– Where they are convenient to concentrations of shops, major community facilities or key public transport nodes where large numbers of pedestrians are likely to pass in the course of their daily activities, increasing the likelihood of spontaneous decisions to play gaming machines.

OR
− In the areas shown in Greater Bendigo Discouraged Gaming Areas [Incorporated Document – see comment in Section 8.4 below].
− Where gaming and any associated uses will be incompatible with the predominant surrounding land uses on the basis of the proposed design, location and operating hours detrimentally affecting the amenity of the surrounding area.

It is preferred that gaming machines are located:
− Where the location could reasonably be perceived as a destination in its own right. This would be achieved by a separation from shopping centres, main public transport interchanges and community facilities involving a high concentration of people undertaking daily activities.
− In areas either towards the periphery of an activity centre outside of the main shopping, transport, community and civic functions of the centre, or within walking distance of the edge of an activity centre.

22.xx-5 Application requirements
It is policy to require applications to include the following information:
− Details about the existing and proposed distribution of EGMs in the municipality.
− A robust assessment of the social and economic benefits and dis-benefits of the proposed EGMs prepared by a suitably qualified person, including details of the nature and extent of community benefits expected from the proposal and how the benefits are to be secured and distributed to the local community.
− If relevant, details of existing gaming expenditure at the venue (over a 3 year period prior to the application) and a forecast of the anticipated expenditure at the venue if the proposal was to be approved.
− Details of existing and proposed gambling and non-gambling related entertainment and recreation facilities at the venue and within a 5km radius.
− If EGMs are to be relocated from other venues, the likely social and economic impact of the proposal on those venues and the local area within which those venues are located.
− If the Applicant contends that gaming expenditure is likely to be transferred from other venues, the Applicant is to provide:
  • particulars as to how the level of transfer has been calculated (including, but not limited to, comparison per machine expenditure at the venue prior to and then after the additional machines, current usage levels of machines at the venue, projected usage level of machines at the venue after the additional machines);
  • the amount of transfer expenditure anticipated;
  • the resulting impact on revenue of the venue from where the expenditure is transferred; and
  • the resulting impact on the venue from where the expenditure is transferred (such as loss of employment, loss of complementary expenditures, loss of customers, impact on ability to provide services etc).
− If it is proposed to move EGMs from one part of the municipality to another, details of the relative social and economic differences between the two parts. An explanation as to why the EGMs are being transferred is to be provided.
− Details of the design and layout of the premises including all proposed and existing signage and evidence of compliance with any relevant gaming regulations concerning premises layout, design and operation.
− Details of the relative socio-economic disadvantage of the suburb or town and the broader 5km catchment of the venue in comparison to the regional Victorian average as defined in the SEIFA index of relative disadvantage.
− Mitigating strategies to prevent problem gambling in relation to the design and management of the venue, including the applicant’s responsible gaming practices.
− A venue management plan identifying strategies to manage patron behaviour and minimise problem gambling in relation to the design and management of the venue, including the applicant’s responsible gaming practices.
− The distance to shopping complexes and strip shopping centres, community facilities, counselling services and public transport.
− Pedestrian counts outside the proposed venue on different days and at a variety of times.

22.xx-6 Decision guidelines
It is policy that the responsible authority consider as appropriate
− Whether there is a net community benefit to be derived from the application.
− Whether the proposal is likely to increase the social disadvantage of an area of the City of Greater Bendigo.
− Whether the location of the gaming machines or gaming premises will facilitate or discourage convenience gaming.
− Whether the venue is accessible by a variety of transport modes.
− Whether residents will have a choice of gaming and non-gaming entertainment and recreation venues in the local area.
− The impact of the proposal on the amenity of the area and surrounding land uses.

22.xx-7 Reference
City of Greater Bendigo Gaming Policy Framework 2007, Coomes Consulting
Figure 6: Strategic Locational Framework Plan – Map 1 Rural Bendigo

Legend:

- Areas of Highest Socio-economic Disadvantage (SEIFA score below 1000)
- Growth Areas
- Village Centres

Bendigo Gaming Policy

Director City of Bendigo

Date: July 2007

Strategic Locational Framework Plan (Map 1)
8.4 Prohibited and discouraged areas in and around shopping centres

Under Clause 52.28-4 of the Greater Bendigo Planning Scheme a strip shopping area is defined as an area meeting all of the following requirements:

- It is zoned for business use.
- It consists of at least two separate buildings on at least two separate and adjoining lots.
- It is an area in which a significant proportion of the buildings are shops.
- It is an area in which a significant proportion of the lots abut a road accessible to the public generally.

The schedule to the clause provides that gaming is prohibited in all strip shopping centres in the City of Greater Bendigo. Unfortunately there are a number of ambiguities associated with the definition of a strip shopping centre as shown by the *Romsey Hotel Pty Ltd v Victorian Commission for Gambling Regulation* decision and as it stands it is left to a decision maker to interpret on a case by case basis what constitutes a strip shopping centre.

In order to provide for certainty and consistency, Council has undertaken an audit of its business areas to determine which will qualify as a strip shopping centre. They have also identified areas where it is considered that, although gaming cannot be prohibited under the provisions of Clause 52.28, it should be discouraged. This is on the basis that gaming should not be convenient to concentrations of shops, community facilities or key public transport nodes where large numbers of pedestrians are likely to pass in the course of their daily activities, increasing the likelihood of spontaneous decisions to play gaming machines.

A map showing the results of this audit is provided at Attachment 7.

The results of this audit can be used by the Council as follows:

- Include maps of prohibited strip shopping centre areas as an attachment to the schedule to Clause 52.28-4. This will ensure there will be no uncertainty about what land is included as a strip shopping centre.
- Include maps showing areas where gaming is discouraged as an incorporated document in the Greater Bendigo Planning Scheme. This document could then be referred to directly in the local policy and help illustrate how to interpret provisions. If Council does not wish to follow this course of action the maps showing discouraged areas could be used as background guidance to help Council and applicants interpret the Clause 22 policy. In this case it is recommended that the first bullet point in the Detailed Location Criteria section of the draft policy set out above be replaced with:
  
  *Gaming machines should not be located:
  - Where they are convenient to concentrations of shops, major community facilities or key public transport nodes where large numbers of pedestrians are likely to pass in the course of their daily activities, increasing the likelihood of spontaneous decisions to play gaming machines.*
9 Planning Tools

9.1 Application process for planning permits related to Gaming (EGMs)

9.1.1 Preferred Application Process

Persons wishing to install or use a gaming machine must apply to:

a) The relevant local government authority for a planning permit under the provisions of the Planning and Environment Act 1987; and

b) The Victorian Commission for Gambling Regulation (VCGR) for either premises approval or to increase the number EGMs under the provisions of the Gambling Regulation Act 2003.

Although there is no requirement to receive approval from one regulatory authority before an application to the other regulatory authority, it is considered preferable that planning issues are either dealt with prior to the gaming application (see Process Diagram 1), or in parallel with the gaming application (see Process Diagram 2).

Some benefits associated with dealing with planning issues prior to the gaming assessment are that:

− Council may consider a broad range of land use, environmental, social and economic factors as well as public objections when determining a planning application for gaming. In comparison the matters that must be considered by the VCGR have a narrower focus (see Table 10 below).

− This is more consistent with other processes where a planning permit and other form of licensing are required, such as in relation to liquor licenses or building permits.

− In addition to being the responsible authority for the planning permit, Council can also make a submission under the provisions of the Gambling Regulation Act which must be considered by the VCGR in deterring whether a premises is suitable for gaming. To maximise the possibility of support from Council at this stage, it would be prudent to have already undertaken a successful planning permit process.

− Council’s submission to the VCGR will be assisted by information obtained through the planning permit process.

An alternative approach would be to deal with the two processes in parallel. The advantages of such an approach will be to:

− Minimise the time taken to consider the proposal.

− Allow opportunities for more collaborative approaches between the applicant and Council to manage issues that may arise in both assessment processes.

− In the event of a refusal from both Council and the VCGR, possibly open the opportunity for a joint planning/gaming appeal to VCAT which will minimise the resources required to appear before the Tribunal. For example joint appeals have been conducted in relation to planning permits and liquor licenses.

It is possible however that Council would not be in a position to comment to the VCGR until after a decision had been reached on the planning permit application.
Process Diagram 1:

1. Apply for planning permit
2. Council considers planning permit
3. Application refused (Applicant can appeal decision to VCAT)
4. Planning permit approved (Objectors can appeal decision at VCAT)
5. Application refused (Applicant can appeal decision at VCAT)
6. Premises approval for gaming (Council can appeal decision at VCAT)
7. VCGR considers premises approval
8. Council makes submission to VCGR which must be considered

Process Diagram 2:

1. Apply for planning permit
2. VCGR submission informed by planning application
3. Council considers planning permit
4. Council makes submission to VCGR which must be considered
5. Application refused (Applicant can appeal decision at VCAT – explore possibility of joint hearing)
6. Premises approval for gaming (Council can appeal decision at VCAT)
7. VCGR considers premises approval
8. Planning permit approved (Objectors can appeal decision at VCAT)
Table 9: Comparison of potentially relevant considerations for planning and gaming approval

<table>
<thead>
<tr>
<th>Planning and Environment Act Section 60</th>
<th>Gambling Regulation Act 2003 Section 3.3.7</th>
</tr>
</thead>
<tbody>
<tr>
<td>Council must consider:</td>
<td>VCGR must not approve a premises as suitable for gaming unless it is satisfied that:</td>
</tr>
<tr>
<td>− the planning scheme</td>
<td>− the applicant has authority to make the application in respect of the premises</td>
</tr>
<tr>
<td>− the objectives of planning in Victoria;</td>
<td>− the premises will be suitable for the management and operation of gaming machines</td>
</tr>
<tr>
<td>− all objections and other submissions</td>
<td>− the net economic and social impact of approval will not be detrimental to the well-being of the community of the municipal district in which the premises are located</td>
</tr>
<tr>
<td>− any comments of a referral authority</td>
<td></td>
</tr>
<tr>
<td>− any significant effects of the proposal on the environment or the environment on the proposal.</td>
<td></td>
</tr>
<tr>
<td>Council may consider:</td>
<td>The VCGR must consider:</td>
</tr>
<tr>
<td>− any significant social and economic effects</td>
<td>− whether the size, layout and facilities of the premises will be suitable.</td>
</tr>
<tr>
<td>− any relevant State environment protection policy</td>
<td>− any submission made by the relevant Council. If the Council does not make a submission, the Commission must seek the Council's views on the application and must consider those views (if any) in determining the application.</td>
</tr>
<tr>
<td>− any other adopted strategic plan, policy statement, code or guideline</td>
<td></td>
</tr>
<tr>
<td>− any adopted, but yet to be approved amendment to the planning scheme</td>
<td></td>
</tr>
<tr>
<td>− any agreement made pursuant to section 173 affecting the land the subject of the application</td>
<td></td>
</tr>
<tr>
<td>− any other relevant matter</td>
<td></td>
</tr>
</tbody>
</table>

9.1.2 Internal process

All applications for gaming machines should be internally referred to the following Council departments for comment:

− Social planning

It is also recommended that the following external organisations be notified of applications for gaming machines:

− Local problem gambling counselling services
− Local police
− Local traders group/s

9.2 Application requirements

The draft policy set out in Section 8.3 above contains an extensive set of application requirements which will allow Council to be in a position to assess the impact of any application and whether there is a net community benefit. The following section expands on the details of these information requirements.
beyond what it is appropriate to include in a policy to ensure that the information submitted is suitable.

9.2.1 Impact assessment
Applicants should provide an impact assessment outlining the environmental, social and economic benefits and costs of the proposed gaming venue.

Information to be included –

| Detailed demographic profile of the anticipated catchment area of the venue | Location of the anticipated catchment area and the basis for this projected catchment |
| Location of patrons in the catchment area including a range of demographic and socio-economic characteristics (such as SEIFA) |
| Comparative analysis of socio-economic profile |
| Projected population growth and characteristics |

| Location assessment | Characteristics of the proposed location of the EGMs such as nearby land uses and movement patterns, including transport |
| Other entertainment/recreation uses, opportunities for social engagement and community services within the catchment area |

| EGM impacts | Anticipated EGM expenditure and what proportion will be diverted forming existing EGM venues |
| Proportion of EGM expenditure to remain in the local community |

| Economic impacts | Employment generated by gaming use and other uses associated with the proposal including details about the types of jobs created |
| Value of new building and infrastructure provision associated with establishment of the proposal |
| Anticipated shift in expenditure from local business |
| Details of any proposed community contributions |
| Any other economic benefits or costs associated with the proposal |

| Social impacts | Details of proposed funding, sponsorship or other contributions to local services and facilities and how these benefits will be distributed and secured. |
| Details of and demand for problem gambling support services including likely changes if application is approved |
| Any other social benefits or costs associated with the proposal |

| Analysis and mitigation | Key social and economic impacts and possible measures to mitigate any negative impacts |

9.2.2 Design and layout
Plans and documents submitted with the application should show

- Internal layout of the venue including location of EGMs in relation to other facilities, including ATMs.
- Location and details of all proposed signage
- Location and number of car parking spaces, including any justification for a reduction in the number of spaces required by Clause 52.06 of the planning scheme.
− Evidence of compliance with relevant gaming regulations regarding layout and signage.

9.2.3 Management plan
Applicants must provide a venue management plan detailing:
− Proposed operating hours
− Measures to manage noise, patrons leaving a premises at night and service of liquor.
− Measures to mitigate any potential negative consequences of EGMs, including staff training, advertising, promotions, exclusion schemes and venue layout.

9.2.4 Location analysis
Applicants must provide details of:
− The walking distance from the proposed venue to nearby shopping complexes and strip shopping centres, community facilities and public transport.
− Existing pedestrian counts outside the proposed venue on weekdays and the weekend in the morning, lunch time and evening.

9.3 Gaming Venue Application- Planning Assessment Tool
As gaming applications will often involve consideration of issues unfamiliar to many planners, an assessment tool has been prepared and is set out in Attachment 8. This will assist planners in quickly identifying the key information they will need to source and assess when an application for gaming is received in order to determine where there will be a net community benefit.

9.4 Planning Permit Conditions related to Gaming (EGMs)
Permit conditions will generally relate to managing outstanding or ongoing matters associated with a development or use. It is considered likely that in most if not all cases gaming machines will be co-located with other uses, that is hotels or clubs, due to the requirement under the Gambling Regulation Act 2003 that only gaming machines can only be located in venues with a General or Club Liquor Licence or Racing Licence. As such most of the generic development and amenity issues associated with the development of a gaming venue are likely to be quite similar to those issues which would affect any large place of assembly or entertainment venue. Permit conditions will therefore also be similar.

It suggested that, if required, the Council utilise its standard permit conditions, or model conditions set out in DSE’s Writing Planning Permits for matters such as:
− Opening hours
− Noise
− Lighting
− Maximum number of persons
− Car parking
− Waste
− Signage
− Regulation of liquor consumption
− General amenity provisions
Landscaping

Where a gaming premises is to be co-located with other complementary entertainment or recreation uses, a Council may wish to ensure that the gaming component of the venue does not commence operation prior to the other uses so that there are always alternative non-gaming activities available for patrons. Such a condition might be worded thus –

**Prior to the commencement of operations of the gaming use hereby permitted, the following entertainment facilities shall be operational and available for use by the general public, unless otherwise authorised by the responsible authority:**
- [add list of other uses]

As discussed in Section 8.1, it is unclear whether it would be possible to ensure that community contributions pledged by an applicant are secured by way of permit condition, although legal advice provided to Coomes Consulting suggests this could be a reasonable requirement that stands a chance of success.

In the case of an application to increase the number of gaming machines in an existing premises, conditions should ensure that they are compatible with the parameters of previous approvals (e.g. opening hours) by either Council, Liquor Licensing or the VCGR.

In relation to matters specifically pertaining to the installation of gaming machines, or the design of gaming premises, it needs to be remembered that many of these issues are already regulated by the VCGR. It is suggested that any planning permit conditions and endorsed plans will need to be consistent with the minimum standards set out in gambling regulations to ensure that there is not a need for later amendments to the permit or plans. Conditions to exceed the normal gambling regulation standards would have to be justified under the normal tests for planning permit conditions:
- A condition must fairly and reasonably relate to the permitted development.
- A condition must serve a planning purpose.
- A condition is invalid if it is so unreasonable that no reasonable responsible authority would have imposed it.
- A condition will also be found to be void or invalid if it is overly vague or uncertain.

Relevant gambling regulations to be mindful of when imposing permit conditions include the following:

**Directions under Section 80 of the Gaming Machine Control Act 1991**
- A gaming machine area must be physically discrete.
- It must not be necessary for a patron of an approved venue to pass through a gaming machine area in order only to enter or leave the venue or gain access to a facility, such as toilets or a smoking area. However, access to a facility may be through a gaming machine area, if there is either –
  - an alternative means of accessing that facility which does not require passing through the gaming machine area; or
  - another of the same facility available to patrons elsewhere in the venue, outside of a gaming machine area;

**Gambling Regulation Act – Rules under Section 3.5.23(1)**
- A venue operator may offer gaming to a person only –
(a) during the period or periods when a licence granted under the *Liquor Control Reform Act* 1998 in respect of the premises authorises the consumption on those premises of liquor supplied on those premises; or
(b) in the case of premises licensed under Part I of the *Racing Act* 1958, during a race meeting —
but not during any break from gaming that the venue operator takes in order to comply with a condition of a premises approval or a venue operator’s licence.

Note: Compliance with the Gambling Regulation Act requires a continuous 4 hour break from gaming after every 20 hours of gaming and that there must not be more than 20 hours of continuous gaming each day unless expressly approved by the VCGR and indicated in the Notice of Approved Venue.

− A venue operator must ensure that the operation of the gaming machine area and each gaming machine is subject to continual supervision. Supervision may be electronic or physical or a combination of both.
− Automatic teller machines (ATM) and electronic funds transfer (EFTPOS) devices must not be accessible by any person within the gaming machine area of an approved venue for the purposes of withdrawing cash.
References


**Websites**


City of Greater Bendigo
Gaming Policy Framework – Attachments

October 2007
Prepared for the City of Greater Bendigo
1 Attachment 1 – Methodology and Consultation Results

Literature Review

Aim
The aim of this task was to gain a comprehensive understanding of the legislative and policy context in which a gaming policy for City of Greater Bendigo will sit.

Approach
A literature review was conducted of the following:

- Legislation (State and Local)
- State and Local policy
- Current Australian research
- Case studies (administrative tribunal)

Outcome
The outcomes of the literature review have been used to develop the principles and policy surrounding the location of gaming venues in the City of greater Bendigo.

The literature review has revealed the evidence based for this strategic justification report.

Socio-Economic Analysis and Existing Facilities Audit for Greater Bendigo

Aim
The aim of the Existing Facilities Audit was to gain information on existing EGM operations within Greater Bendigo. The aim of the Socio-Economic Analysis was to gather relevant social research and data that could inform gaming policy.

Approach
Existing Facilities Audit:
- Desktop review
- Consultations with venue owners and operators

Socio-Economic Analysis
- Desktop analysis
- Consultations with venue owners and operators, community organisations and COGB planners

Outcome
The outcomes of these tasks were used to inform the City of Greater Bendigo gaming principles, local planning policy framework and EGM application process.

Consultations
**Bendigo Community Health**

**Aim**
- Provide any research or data on gaming
- Provide information on factors that encourage problem gambling and who is most susceptible to problem gambling
- Recommendations on the preferred or non preferred locations for gaming machines

**Approach**
A 30 minute telephone interview was conducted with the Community Educator for Gamblers Help.

**Outcomes**
- There is a lack of local research and data on gaming
- Gaming venues are often located on public transport routes and in areas of social disadvantage
- Areas of disadvantage and easy access should be avoided when locating EGM facilities
- Destination gaming venues would be a preferred option
- Evidence should be provided on where EGM revenue is used for community benefit
- Machine design should be controlled by Local Government e.g. a requirement on a permit condition
- More research should be conducted into the characteristics of gaming within hotels and what makes them profitable

**Bendigo Police**

**Aim**
- Provide any research or data on gaming particularly in relation to crime
- Recommendations on the preferred or non preferred locations for gaming machines

**Approach**
Conducted two 30 minute telephone interviews with two senior members of the Bendigo Police

**Outcomes**
- The police are not generally involved with gaming venues in Bendigo as they are predominantly well managed and they are satisfied with the security and clientele
- There has been a dramatic rise in anti social behaviour near and within licensed (liquor) venues which has been partly attributed to late opening hours
Further research needs to be conducted into the linkages between crime and gaming as currently this link has been identified however there is no hard data support it

More knowledge is required on how gaming revenue is spent within the community

**Gaming industry and operators**

**Aim**
- Provide any research or data on gaming
- Venue owners/managers to provide details of current operations e.g.- services they provide, how and what they contribute to the community
- Discussion around the future locations of EGMs and new EGM venues within Bendigo

**Approach**
A 1 hour focus group was conducted with gaming venue owners within Greater Bendigo and the TABCORP Community Liaison Officer and Tattersall's Responsible Gaming Manager

**Outcomes**
Some venue owners stated that the Community Benefit Fund did not give a clear indication of venues contribution to the community
- Within Bendigo gaming venues provide a range of other services such as function rooms, sporting facilities and dining
- The State Government should provide evidence of where the 8.3% tax (Community Support Fund) is distributed within the Bendigo Community
- EGMs are stigmatised compared to other forms of gaming e.g.- racing
- New growth areas were identified as potential future locations for new gaming venues
- The VCGR currently has controls on venue design such as lighting, windows, advertising which would not then need to be covered within planning permit conditions
- There are currently harm minimisation measures in place in gaming venues which include:
  
  **Regulated Measures**
  - Clocks on machines, brochures on gamblers help and ‘can you really win on gaming machines’ talkers and posters on machines

  **Industry Voluntary Measures**
  - Development of gaming industry Responsible Gambling Codes of Practice,
  - Responsible Service of Gaming training courses and training manuals for EGM gaming staff;
In-venue campaigns promoting responsible gambling by customers
Provision of receipts for EGM play;

Planners from City of Greater Bendigo

Aim
- Recommendations on the preferred or non-preferred locations for gaming machines
- Discussion around possible permit requirements and conditions for new EGM venues

Approach
A one-hour focus group was conducted with four planners from the City of Bendigo

Outcomes
- Clear guidelines need to be created to
- Identified potential areas that could have EGM caps placed on them e.g.- Eaglehawk, Long Gully, Smaller Townships e.g.- Heathcote
- EGMs can either be transferred around either by the venue for commercial reasons or forcibly by the State Government e.g.- away from disadvantaged areas
Attachment 2 – Ministerial Direction S124 on Community Purpose

Victoria Government Gazette

No. S 124 Thursday 26 June 2003
By Authority, Victorian Government Printer

SPECIAL

Gaming Machine Control Act 1991

1. André Haermeyer MP, Acting Minister for Gaming, pursuant to section 136AB of the Gaming Machine Control Act 1991, make the following determination of the kind of activities or purposes that constitute community purposes:

1. The purposes that constitute community purposes are:

(a) any philanthropic or benevolent purpose, including the promotion of art, culture, science, religion, education or charity including the benefiting of organisations designated by the Australian Taxation Office as ‘Income Tax Exempt Charities’, and including the benefiting of a fund or part of a fund of the Australian Red Cross Society, or

(b) any sporting or recreational purpose, including the benefiting of any sporting or recreational club or association, but excluding any club or association that holds a venue operator’s licence.

2. The activities that constitute community purposes are:

(a) employment expenses of all staff employed by venue operators, including employment expenses of staff in gaming and non-gaming areas, excluding State and Commonwealth taxes.

(b) gifts and sponsorships by venue operators that fall within the definition in (1) above, including gifts of:

i. funds:

A) donations of the venue operator’s funds; and

B) sponsorships

ii. goods – donations of goods paid for by the venue operator are community benefits, but not collections of goods on behalf of charities or other community groups;

iii. services – all voluntary services provided by members and staff of the venue operator to the community in fulfilment of the community purposes. The amount of the benefit to be credited (as an hourly rate) for the voluntary activities is $20.00. Expenses incurred by volunteers may also be included as community benefits.

(c) subsidised activities where the venue operator provides a commercial service to members of the community or community organisations at less than commercial rates, the amount of the benefit is the difference between the commercial selling price and the selling price that the venue operator offers to the public.

(d) The provision of fixed assets, other than fixed assets used for gaming purposes.

Dated 24 June 2003

ANDRÉ HAERMeyer MP
Acting Minister for Gaming
Attachment 3 - Clause 52.28

GAMING

52.28-1 Purpose
To ensure that gaming machines are situated in appropriate locations and premises.
To ensure the social and economic impacts of the location of gaming machines are considered.
To prohibit gaming machines in specified shopping complexes and strip shopping centres.

52.28-2 Permit requirement
A permit is required to install or use a gaming machine.
This does not apply in either of the following circumstances:
- Clause 52.28-3 or Clause 52.28-4 specifically prohibit a gaming machine.
- the gaming machine is in an approved venue under the Gambling Regulation Act 2003 on 18 October 2006 and the maximum number of gaming machines for the approved venue on 18 October 2006 is not exceeded.

52.28-3 Prohibition of a gaming machine in a shopping complex
Installation or use of a gaming machine is prohibited on land specified in a schedule to this clause.
This does not apply to a gaming machine in an approved venue under the Gambling Regulation Act 2003 on 18 October 2006 and the maximum number of gaming machines for the approved venue on 18 October 2006 is not exceeded.

52.28-4 Prohibition of a gaming machine in a strip shopping centre
Installation or use of a gaming machine is prohibited in a strip shopping centre if:
- the shopping centre is specified in the schedule to this clause.
- the schedule provides that a gaming machine is prohibited in all strip shopping centres on land covered by this planning scheme.
This does not apply to a gaming machine in an approved venue under the Gambling Regulation Act 2003 on 18 October 2006 and the maximum number of gaming machines for the approved venue on 18 October 2006 is not exceeded.

A strip shopping centre is an area that meets all of the following requirements:
- it is zoned for business use;
- it consists of at least two separate buildings on at least two separate and adjoining lots;
- it is an area in which a significant proportion of the buildings are shops;
- it is an area in which a significant proportion of the lots are on a road accessible to the public generally;
but it does not include the Capital City Zone in the Melbourne Planning Scheme.

52.28-5 Transitional arrangements
The requirements of Clause 52.28 as in force immediately before 18 October 2006 continue to apply to a gaming machine referred to in a transitional application and permitted in the determination of a transitional application if a planning permit was not required immediately before 18 October 2006 for that gaming machine.
In this clause, "transitional application" means an application or request made, and not determined, before 18 October 2006 to the Victorian Commission for Gambling under the Gambling Regulation Act 2003 for either:

- an approval of premises for gaming, or variation of approval of premises for gaming, or
- amendment of conditions of a venue operator's licence to vary the number of permitted gaming machines for an approved venue.

Decision guidelines

Before deciding on an application, in addition to the decision guidelines of Clause 65, the responsible authority must consider, as appropriate:

- The State Planning Policy Framework and the Local Planning Policy Framework including the Municipal Strategic Statement and local planning policies.
- The compatibility of the proposal with adjoining and nearby land uses.
- The capability of the site to accommodate the proposal.
- Whether the gaming premises provides a full range of hotel facilities or services to patrons or a full range of club facilities or services to members and patrons.
4 Attachment 4 – Gaming Research Key Issues Context

Why do people gamble?

For the majority of gamblers, gaming is an enjoyable form of entertainment. However, it is recognised that EGMs are not a completely benign form of entertainment and for a small percentage of the people, can cause harm to the individual, their families and the community in a way that other entertainment facilities and leisure pastimes may not.

The reviewed research indicates that people gamble for a number of reasons, including:
- to reduce loneliness, isolation and boredom
- to win money
- entertainment and excitement
- for social contact
- to reduce stress/gambling as way to cope or escape
- in response to relationship difficulties or breakdown
- gaming is an accessible and non-discriminatory form of recreation
- local (PC 1999; New Focus 2005)

The reasons for gambling differ between males and females; females gamble due to boredom, and are more likely to participate in ‘chance’ gaming (lottery, EGMs) whereas men are more likely to gamble for excitement and are more likely to bet on sporting events and games of skill (AMA 1999).

As a form of recreation, gaming machines address a series of distinct motivations that may not be satisfied by other forms of entertainment. Some of the features that particularly attract people to play EGMs as a form of gambling include:

- Entertainment facilities that are self-activated
- An individual form of entertainment where the start time and length of play can be decided by the player
- Social contact in a non-confrontational environmental
- A social environment that allows for privacy and non-participation in organised activity
- Affordable food and beverages provided in many of the venues
- Accessibility by location and opening hours
- Personal security (New Focus Research 2005)

Understanding Problem Gambling

The Productivity Commission Report *Australian Gambling Industries* defines problem gambling as:
“the situation where gambling in our society gives rise to harm to the individual player and/or to his or her family and may extend to the community”

By this definition, problem gambling is an issue of public health; and is an issue of concern not only for the individual problem gambler, but also for the Government, the gambling industry, and the general community.

‘Problem gamblers’ are estimated to make up 2.1% of Australian adults, yet they contribute to about a third of the gambling industry’s market; in 1999 problem gamblers lost on average $12,000 a year (PC1999).

Whilst there is no typical profile of a problem gambler, there are a number of features that can make a person more vulnerable to problem gambling. Evidence shows that the majority of known problem gamblers earn a lower than average income and are single (New Focus 2005, AMA 1999, AIGR 1996; Brown and Coventry 1997, VCGR 1997, PC 1999)

Research conducted by New Focus regarding problem gamblers indicated that in addition to these broader features, female sole parents and unemployed males were also vulnerable groups (New Focus 2005).

Whilst the majority of known problem gamblers are men, the number of women problem gamblers is increasing, most likely related to gaming machines. EGMs have a higher association with problem gambling than other gambling forms and evidence has suggested that women were more likely to play EGMs than men (AMA 1999; PC 1999).

The 1999 Productivity Commission Report identified a series of negative impacts that can stem from problem gambling:

- Health impacts (mental and physical health, anxiety, depression, suicide and substance abuse)
- Interpersonal impacts (family and marital breakdown, domestic violence, neglect)
- Financial impacts (personal financial hardships and debt; cost of help services; loss of revenue to the local economy)
- Legal impacts (crime, theft, imprisonment)
- Impacts on community services (cost and workload for counselling and health services, police, local government)
- Impacts on work or study (job loss, poor performance, absenteeism) (PC 1999; supported by research from New Focus 2005)

Possible Social Impact

Research indicates that EGM gaming can have a series of social benefits as well as negative impacts on the community.
Gaming machine venues can provide opportunities for community cohesion, increased recreational and entertainment opportunities (the machines and also the other club and hotel facilities that are included in the facility) (refer to Romsey Hotel Pty Ltd v VCGR 2007); and increased opportunities for social contact.

However, studies have suggested that accessible EGMs (through a combination of the location, number of machines, number of venues, opening hours and social accessibility) and the growth of machine numbers and venues can have serious social consequences for disadvantaged communities in particular (ANU 2004).

EGM consumption patterns closely correlate with measures of socio-economic disadvantage. Evidence has shown that disadvantaged areas are more likely to have higher densities of EGMs and to spend more money on EGMs (Livingstone 2006; Doughney 1999). People living in such areas, from a disadvantaged socio-economic background (including income, employment, marital status and gender) have been proven to be more vulnerable to problem gambling and the negative impacts of gaming (AMA 1999; New Focus 2005; PC 1999)

Evidence has indicated that gamblers who live within 4km of their regular club are more likely to gamble, to have a higher annual expenditure on gambling, to gamble more frequently and to play for longer duration than those who have to travel further to gamble (ANU 2004).

Research has suggested that the proximity of gaming venues to places of community congregation (including shopping centres and activity centres), residential areas and areas of socio-economic disadvantage influenced gambler behaviour (ANU 2004). This leads to the conclusion that gaming venues should be located away from areas of disadvantage and should be less accessible to vulnerable communities.

The implications of improved access to gaming machines in areas where these opportunities did not previously exist are that whilst entertainment opportunities are increased, there is a lack of choice, which can have particular ramifications for those who are recognised as vulnerable groups to problem gaming. Therefore, the benefit of increased entertainment opportunities must be balanced with the locational and demographic context of the specific area. For example, gaming should avoid being the sole form of entertainment in an area of socio-economic disadvantage.

Research indicated that a balanced approach needs to be taken when assessing the social impact of a gaming venue. Gaming should be available to the majority of the community who see it as a form of recreation and social contact; whilst protecting vulnerable members of the community from the harm associated with it. The most vulnerable communities are recognised as those areas of disadvantage or marginalisation and as research shows that there is a correlation between problem gambling and
the accessibility of gaming venues; venues should be encouraged to locate away from areas of socio-economic disadvantage.

Possible Health Impact

Gaming, and problem gambling in particular, can have adverse effects on individual and community health including higher levels of anxiety, depression and suicide. Problem gamblers have also been identified as being more prone to substance abuse (AMA 1999).

Problem gambling is an addiction and a serious public health problem. According to the Productivity Commission, the prevalence of problem gambling in Australia was lower than levels of excessive smoking or alcohol consumption, but higher than the use of illicit drugs (PC 1999).

Reduced funds mean that people have less ability to access health and counselling services or afford nutritious food, which can affect physical health (AMA 1999; Brown and Coventry 1997). Physical health is not improved by the consideration that gaming is a sedentary form of recreation.

Possible Economic Impact

The economic impact of gaming is the impact on the individual (debt and financial hardship) and a net loss of revenue from the local economy (KPMG 1999). Gaming can provide some economic benefit through the implemented Community Support Fund and increased community facilities and services, but the amount lost to the local economy is not always returned at a comparable rate (VCGR 1997).

The individual financial impact of gaming can be linked to social and health problems including stress, anxiety and marital and family break up; and can lead on to further social and community impacts. Financial implications of problem gambling may affect a gamblers’ ability to pay bills, buy nutritious food or access medical services, therefore linking problem gambling, public health and socio-economic factors (Brown and Coventry 1997).

A variety of sources have indicated that entertainment patterns changed due to the introduction of EGMs into a localised area. Existing entertainment and retail operators in each of the subject areas noted a loss of trade that they believed was a direct result of the introduction of EGMs and the loss of the consumer dollar to gaming (PC 1999; VCGR 1997a; BCHS 2002).

Gaming machines result in slight increases in employment and provide financial revenue for clubs and hotels. Gaming revenue enables local clubs and hotels to develop their facilities and services to increase the range of recreational and entertainment opportunities within the local community and may provide the community with services.
Community Return (CSF & CBS)

Hotels are required under legislation to pay an additional tax of 8.33% of net gaming revenue into the Community Support Fund (CSF). This State tax fund is then used across the State to direct a portion of the financial benefits of EGMs to the Victorian community, to which organisations are able to apply for grants to improve community wellbeing. Last year this fund raised $91 million in Victoria.

The State funding does not always correlate to the expenditure that is removed from that particular community. The City of Greater Bendigo noted a loss of over $42 million to the local economy in 2005/2006.

Clubs are not required to pay the CSF tax, but must produce a Community Benefit Statement (CBS) to show the public exactly how EGMs provide benefit to the community. The statements are also designed to show that clubs benefit the community in other ways to hotels with EGMs who pay the CSF tax.

Purposes and activities that constitute “community purpose” in the CBS are defined by the Minister for Gambling and are relatively broad. Ministerial Direction S124 (June 2003) defines community purpose activities as including employment expenses and subsidised activities, as well as sponsorship and donations. This can be broadly interpreted by clubs and may include what is considered normal business expenses claimed as community benefit. This was a key concern arising from stakeholder interviews in Bendigo. (refer to Attachment 2 for a full copy of this Ministerial Direction)

Therefore, whilst legislation is in place to see that revenue is used for community purposes and is returned to the community from which it comes, the way in which the fund is implemented has seen as uneven rate of return to affected communities. In the past it has produced a net negative economic impact at the local community level.

This assumes an alternative use of this money, perhaps through a more targeted approach to funding, would produce a better outcome for the community. Local Councils should endeavour to find innovative ways that the community can better benefit from this revenue

Implications for location

Gaming research as discussed above indicates that gaming venues need to be located away from disadvantaged communities and places where people congregate for everyday activities. There is some evidence to support the idea of destination gambling as a way of limiting the impact of convenience gambling.
Used in this context, ‘convenience gaming’ relates to the co-location of gaming machines in areas where people undertake daily activities. ‘Destination gambling’ refers to a gaming venue that is a destination in its own right. The model looks at providing fewer venues but larger venues. The important element when assessing gaming venues is not that they are inaccessible (they may be located on transport routes or accessible by public transport) but that they are not convenient and that a conscientious decision has been made to gamble.

Destination gambling is described as:

“a style of gambling that encourages pre-determined decisions to gamble” (Taking Action on Problem Gambling, 2006)

Destination gambling venues are set apart from retail and community facilities where everyday activities take place. This reduces the likelihood of people being enticed to enter gaming venues rather than the decision to gamble being predetermined and considered. In this sense, gamblers are exercising their right to partake in a legitimate recreational activity, whilst it is concurrently recognised that gambling can have negative social and economic ramifications for some patrons.

Destination gaming can be better for the community overall but has been proven to be devastating for the community where the large gaming venues is located (Kirby 2005)

There is an identified need for further research into the costs and benefits of destination gambling in an attempt to underpin policy making in this area. The community and industry have shown support for destination gambling venues, which has encouraged Government to focus on examining destination gambling arrangements1.

Whilst it is recognised that problem gaming is an addiction (PC 1999), and therefore normal consumer behaviour does not always apply, the destination gaming model seeks to protect communities that may be vulnerable to problem gambling and at risk of the impact of gaming.

1 A project is currently underway to establish whether destination gambling can deliver net community benefit. The Project is entitled “Local Area Studies in Victoria: An Exploration of Destination Gaming and Harm Reduction” and is funded by the Department of Justice as part of State Government’s Taking Action on Problem Gambling Strategy.
## City of Greater Bendigo Socio Economic Data Sheet (based on 2006 census data)

<table>
<thead>
<tr>
<th>Suburb</th>
<th>Population 2006</th>
<th>Median Age</th>
<th>Median Household Weekly Income</th>
<th>Median Weekly Individual Income</th>
<th>Average household size</th>
<th>Median Weekly Rent</th>
<th>Median Monthly Housing Loan Repayment</th>
<th>Level of Schooling Completed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bendigo</td>
<td>6,059</td>
<td>36</td>
<td>14.5%</td>
<td>$774</td>
<td>2.2</td>
<td>$162</td>
<td>$953</td>
<td>37.2% 33.1% 7.9%</td>
</tr>
<tr>
<td>East Bendigo</td>
<td>2,038</td>
<td>38</td>
<td>17.9%</td>
<td>$870</td>
<td>2.3</td>
<td>$170</td>
<td>$1,019</td>
<td>37.5% 35.7% 6.2%</td>
</tr>
<tr>
<td>Flora Hill</td>
<td>3,849</td>
<td>27</td>
<td>13.7%</td>
<td>$774</td>
<td>2.3</td>
<td>$175</td>
<td>$1,000</td>
<td>55.7% 26.9% 9.2%</td>
</tr>
<tr>
<td>Quarry Hill</td>
<td>2,222</td>
<td>34</td>
<td>10.2%</td>
<td>$942</td>
<td>2.4</td>
<td>$175</td>
<td>$900</td>
<td>50.0% 27.3% 7.8%</td>
</tr>
<tr>
<td>Spring Gully</td>
<td>2,845</td>
<td>40</td>
<td>17.0%</td>
<td>$938</td>
<td>2.4</td>
<td>$176</td>
<td>$1,054</td>
<td>42.0% 32.0% 4.4%</td>
</tr>
<tr>
<td>Golden Square</td>
<td>8,170</td>
<td>36</td>
<td>17.2%</td>
<td>$799</td>
<td>2.4</td>
<td>$160</td>
<td>$953</td>
<td>30.3% 42.20% 6.5%</td>
</tr>
<tr>
<td>Kennington</td>
<td>5,647</td>
<td>40</td>
<td>21.9%</td>
<td>$846</td>
<td>2.3</td>
<td>$175</td>
<td>$1,040</td>
<td>41.8% 34.3% 6.1%</td>
</tr>
<tr>
<td>West Bendigo</td>
<td>384</td>
<td>34</td>
<td>9.9%</td>
<td>$738</td>
<td>2.7</td>
<td>$130</td>
<td>$932</td>
<td>24.0% 49.8% 10.1%</td>
</tr>
<tr>
<td>Ironbark</td>
<td>1,177</td>
<td>36</td>
<td>15.9%</td>
<td>$771</td>
<td>2.2</td>
<td>$160</td>
<td>$867</td>
<td>34.0% 37.0% 7.6%</td>
</tr>
<tr>
<td>Long Gully</td>
<td>3,289</td>
<td>35</td>
<td>16%</td>
<td>$589</td>
<td>2</td>
<td>$135</td>
<td>$849</td>
<td>22.3% 52.8% 12.1%</td>
</tr>
<tr>
<td>Strathdale</td>
<td>5,582</td>
<td>41</td>
<td>16.6%</td>
<td>$1,017</td>
<td>2.5</td>
<td>$180</td>
<td>$1,083</td>
<td>39.7% 34.7% 4.8%</td>
</tr>
<tr>
<td>White Hills</td>
<td>2,626</td>
<td>36</td>
<td>15.7%</td>
<td>$771</td>
<td>2.5</td>
<td>$170</td>
<td>$1,000</td>
<td>28.0% 46.1% 6.8%</td>
</tr>
<tr>
<td>Community</td>
<td>Population</td>
<td>Divorces</td>
<td>Divorce Rate (%)</td>
<td>Total Divorces</td>
<td>Average Divorces per Person</td>
<td>Average Divorces per House</td>
<td>Average Divorces per Business</td>
<td>Source</td>
</tr>
<tr>
<td>-------------------</td>
<td>-----------</td>
<td>----------</td>
<td>------------------</td>
<td>----------------</td>
<td>-----------------------------</td>
<td>----------------------------</td>
<td>-------------------------------</td>
<td>--------</td>
</tr>
<tr>
<td>Junortoun</td>
<td>2,103</td>
<td>38</td>
<td>7.7%</td>
<td>$1,234</td>
<td>$507</td>
<td>$200</td>
<td>$1,083</td>
<td></td>
</tr>
<tr>
<td>Strathfieldsaye</td>
<td>3,147</td>
<td>31</td>
<td>5.8%</td>
<td>$1,281</td>
<td>$554</td>
<td>$230</td>
<td>$1,283</td>
<td></td>
</tr>
<tr>
<td>Epsom</td>
<td>1,405</td>
<td>30</td>
<td>8.7%</td>
<td>$1,057</td>
<td>$491</td>
<td>$210</td>
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</tr>
<tr>
<td>Ascot</td>
<td>1,050</td>
<td>38</td>
<td>7.0%</td>
<td>$1,214</td>
<td>$504</td>
<td>$195</td>
<td>$1,009</td>
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<tr>
<td>Huntly</td>
<td>1,492</td>
<td>36</td>
<td>8.0%</td>
<td>$995</td>
<td>$432</td>
<td>$178</td>
<td>$993</td>
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</tr>
<tr>
<td>Maiden Gully</td>
<td>3,225</td>
<td>33</td>
<td>5.2%</td>
<td>$1,195</td>
<td>$491</td>
<td>$200</td>
<td>$1,116</td>
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</tr>
<tr>
<td>Big Hill</td>
<td>199</td>
<td>44</td>
<td>13.1%</td>
<td>$753</td>
<td>$383</td>
<td>$120</td>
<td>$1,000</td>
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</tr>
<tr>
<td>Kangaroo Flat</td>
<td>8,421</td>
<td>38</td>
<td>17.8%</td>
<td>$722</td>
<td>$373</td>
<td>$160</td>
<td>$975</td>
<td></td>
</tr>
<tr>
<td>Golden Square</td>
<td>8,170</td>
<td>36</td>
<td>17.2%</td>
<td>$799</td>
<td>$413</td>
<td>$160</td>
<td>$953</td>
<td></td>
</tr>
<tr>
<td>Eaglehawk</td>
<td>4,346</td>
<td>38</td>
<td>16.4%</td>
<td>$666</td>
<td>$383</td>
<td>$200</td>
<td>$1,000</td>
<td></td>
</tr>
<tr>
<td>Sailors Gully</td>
<td>651</td>
<td>40</td>
<td>12.0%</td>
<td>$721.0</td>
<td>$373.0</td>
<td>$120</td>
<td>$859</td>
<td></td>
</tr>
<tr>
<td>Heathcote*</td>
<td>2,689</td>
<td>51</td>
<td>26.2%</td>
<td>$549</td>
<td>$284</td>
<td>$125</td>
<td>$769</td>
<td></td>
</tr>
<tr>
<td>Marong*</td>
<td>393</td>
<td>41</td>
<td>12.5%</td>
<td>$751</td>
<td>$380</td>
<td>$250</td>
<td>$1,083</td>
<td></td>
</tr>
<tr>
<td>Elmore*</td>
<td>880</td>
<td>44</td>
<td>23.4%</td>
<td>$602</td>
<td>$328</td>
<td>$100</td>
<td>$660</td>
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</tr>
<tr>
<td>North Bendigo</td>
<td>3,759</td>
<td>38</td>
<td>20.3%</td>
<td>$696</td>
<td>$372</td>
<td>$230</td>
<td>$867</td>
<td></td>
</tr>
<tr>
<td>Jackass Flat</td>
<td>224</td>
<td>29</td>
<td>4.9%</td>
<td>$1,214</td>
<td>$417</td>
<td>$310</td>
<td>$1,246</td>
<td></td>
</tr>
<tr>
<td>California Gully</td>
<td>3,844</td>
<td>37</td>
<td>17.6%</td>
<td>$626</td>
<td>$343</td>
<td>$137</td>
<td>$865</td>
<td></td>
</tr>
<tr>
<td>Greater Bendigo</td>
<td>93,252</td>
<td>37</td>
<td>14.8%</td>
<td>$833</td>
<td>$403</td>
<td>$250</td>
<td>$997</td>
<td></td>
</tr>
<tr>
<td>Rural Balance</td>
<td>408,713</td>
<td>41</td>
<td>11.5%</td>
<td>$1,020</td>
<td>$441</td>
<td>$280</td>
<td>$1,083</td>
<td></td>
</tr>
<tr>
<td>Victoria</td>
<td>4,932,422</td>
<td>37</td>
<td>13.6%</td>
<td>$1,022</td>
<td>$456</td>
<td>$260</td>
<td>$1,252</td>
<td></td>
</tr>
</tbody>
</table>

**Notes:**
- *For people aged 15 years and over*
- *Areas classified as state suburb and take in a larger area than township.*

Source ABS 2006 Census of Population and Housing
6 Attachment 6 – CBD Precinct Map

Source: Bendigo CBD Plan, Planisphere, 2005
## Attachment 8 – Application Assessment Tool

<table>
<thead>
<tr>
<th>Points of Consideration</th>
<th>Data Sources</th>
<th>Comments/Assessment (to be completed by Planning Officer)</th>
</tr>
</thead>
</table>
| Level of socio-economic disadvantage | - SEIFA – see below  
- Community Profile and Forecasts, Id Consulting - Council website  
- ABS Census InfoMap on Housing Stress  
- DVC Indicators of Community Strength  
- Community Indicators Victoria ([www.communityindicators.net.au](http://www.communityindicators.net.au))  
- Council research department where relevant | |
| SEIFA rating ABS (Relative socio-economic disadvantage) | - ABS Website  
- Community Profile and Forecasts, Id Consulting - Council website | |
| Transport (including major transport routes and access to public transport) | - Transport planning department, Council  
- Department of Infrastructure | |
| Non-gaming recreational and entertainment facilities available within a 4km radius | - Council website (Council Services)  
- Recreation and Leisure Department, Council | |
| Economic Impact (rate of return to the community (sponsorship, donation), employment and estimated cost of revenue lost to the local community) | - VCGR Research and Statistics ([www.vcgr.vic.gov.au](http://www.vcgr.vic.gov.au))  
- CBS reports on the VCGR website  
- ABS Census data  
- Applicant | |
<table>
<thead>
<tr>
<th>Points of Consideration</th>
<th>Data Sources</th>
<th>Comments/Assessment (to be completed by Planning Officer)</th>
</tr>
</thead>
</table>
- Gaming Policy Framework, Coomes Consulting Group | |
- Gaming Policy Framework, Coomes Consulting Group | |
| Located proximate to, but not in the centre of local activity centres/urban centres | - Gaming Policy Framework, Coomes Consulting Group  
- Planning Scheme | |
| Not convenient to shops | - Strip Shopping Centre Audit 2007  
- Consider location of surrounding land uses  
- Applicant | |
| Location with regard to future growth areas | - DSE Population projections  
- Community Forecasts, Id Consulting - Council website  
- Planning Scheme  
- Any relevant policy or document (for example, structure plans, development plans and growth strategies where applicable) | |
| Considered a destination in its own right? | - Applicant  
- Consider other services/facilities within the venue  
- Consider proximity to other land uses around the venue  
- Consider proximity to transport/accessibility of the proposal | |
<p>| Non-gaming services and facilities provided in the application | - Applicant | |</p>
<table>
<thead>
<tr>
<th>Points of Consideration</th>
<th>Data Sources</th>
<th>Comments/Assessment (to be completed by Planning Officer)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scale</td>
<td>Applicant</td>
<td></td>
</tr>
<tr>
<td>(size of venue and no. of EGMs etc)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Will the proposal provide net community benefit?