

## **Surf Coast Shire - Gaming Policy Framework**

February 2008

Prepared by Coomes Consulting Group for the Surf Coast Shire

Reference Document

The Surf Coast Shire Gaming Policy Framework is a reference document of the Surf Coast Planning Scheme. As a reference document it provides background information to assist in understanding the context within which a particular policy or provision has been framed. This document is not part of the Surf Coast Planning Scheme and has no legislative status under the *Planning and Environment Act, 1987*.

Surf Coast Shire Council, 2008.

## Contents

1	<b>Executive Summary</b>	<b>5</b>
2	<b>Introduction</b>	<b>9</b>
3	<b>The Legislative Context to Gaming</b>	<b>10</b>
3.1	The Regulation of Gaming (EGMs) in Victoria	10
3.2	Planning	12
3.3	Subordinate Legislation and Directions	12
3.4	State Government Policy Position	15
3.5	Local Policies and Provisions	16
3.6	Commentary	19
4	<b>Applications of Gaming Machines – Victoria and Surf Coast Shire</b>	<b>21</b>
4.1	Victoria	21
4.2	Surf Coast Shire	24
5	<b>Surf Coast Shire Local Context</b>	<b>29</b>
5.1	Surf Coast Shire Socio-Economic Profile	29
5.2	Development and Growth Trends	36
6	<b>Key Social and Economic Issues Associated with Gaming (EGMs)</b>	<b>38</b>
6.1	Research on Gaming and Location	38
6.2	Planning Considerations	41
6.3	Resolution of these issues in the interest of Net Community Benefit	43
7	<b>Locational Principles for Gaming</b>	<b>45</b>
7.1	Rationale for Principles	46
8	<b>Strategy and Policy Recommendations</b>	<b>52</b>
8.1	Opportunities to influence gaming outcomes through local policy	52
8.2	Further responsible gaming work	53
8.3	Municipal Strategic Statement Format and Content	53
8.4	Strategy Options	54
8.5	Rewriting of the Municipal Strategic Statement	55
8.6	Strategy Option 2 Recommendations	55
8.7	Draft Policy	58
8.8	Prohibited and discouraged areas in and around shopping centres	63
9	<b>Planning Tools</b>	<b>64</b>
9.1	Application process for planning permits related to Electronic Gaming Machines (EGMs)	64
9.2	Application requirements	66
9.3	Gaming Venue Application- Planning Assessment Tool	68

9.4	<b>Planning Permit Conditions related to Gaming (EGMs)</b>	<b>68</b>
<hr/>		
10	<b>References</b>	<b>71</b>
11	<b>Attachment 1 - Methodology and Consultation Results</b>	
12	<b>Attachment 2 - Proposed Ministerial Direction on Community Purpose</b>	
13	<b>Attachment 3 - Clause 52.28</b>	
14	<b>Attachment 4 - Gaming Research Key Issues Context</b>	
15	<b>Attachment 5 - Surf Coast Shire Policy Review</b>	
16	<b>Attachment 6 - Socio-Economic Data for Surf Coast Shire</b>	
17	<b>Attachment 7 – Spatial Audit</b>	
18	<b>Attachment 8 - Assessment Tool for evaluating net community benefit of gaming applications</b>	

### List of Tables and Figures

- Figure 1: Capped Regions, Victoria  
Figure 2: Gaming Expenditure  
Figure 3: EGM venues Surf Coast Shire  
Figure 4: Proportion of Households Suffering Housing Stress within Surf Coast Shire  
Figure 5: Surf Coast Shire SEIFA rating of Relative Disadvantage by township  
Figure 6: Strategic Locational Framework Plan – Surf Coast Shire

- Table 1: Historical Data – Gaming Machines in Victoria  
Table 2: Venues with EGMs in Surf Coast Shire  
Table 3: EGM Densities in Surf Coast Shire 2007  
Table 4: EGM Density per 1000 adult in Surf Coast Shire 2006  
Table 5: Surf Coast Shire Gaming Machine Expenditure 2006/2007  
Table 6: Community Benefit Statement 2005-2006, Surf Coast Shire  
Table 7: Major Industries in Surf Coast Shire  
Table 8: SEIFA index Surf Coast Shire  
Table 9: Population Forecasts for Surf Coast Shire  
Table 10: Comparison of potentially relevant considerations for planning and gaming approval

### List of Abbreviations

- ABS – Australian Bureau of Statistics  
CBS – Community Benefit Statements  
CSF – Community Support Fund  
EGM – Electronic Gaming Machine  
LGA – Local Government Area  
SEIFA – Socio Economic Indicators for Areas  
VCGA – Victorian Casino and Gaming Authority  
VCGR – Victorian Commission for Gambling Regulation  
VCAT – Victorian Civil and Administrative Tribunal  
VPPs – Victorian Planning Provisions  
MSS – Municipal Strategic Statement  
LPPF – Local Planning Policy Framework  
SPPF – State Planning Policy Framework

---

## 1 Executive Summary

### Context

Changes to the Victorian Planning Provisions on the 18<sup>th</sup> 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 Surf Coast Shire, 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 positions on gaming. A review of State and Surf Coast Shire policies has informed locational principles for gaming venues in the municipality.

### Gaming in Victoria and the Surf Coast Shire

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 Surf Coast Shire is not a capped region and has 111 Electronic Gaming Machines located within 4 venues. In 2006, the municipality had an overall density of 6.06 machines per 1000 adults and expenditure per adult of \$267, which are both lower than the State average.

### Surf Coast Shire Local Context

The Surf Coast Shire is a large municipality with significant rural hinterlands to the north and variety of smaller townships located both in the north and along the

coastline to the south. For a variety of reasons including significant lifestyle/tourist attractions, accessibility to Melbourne and Geelong and the 'sea-change' trend, the shire is experiencing considerable growth both by increasingly permanent and traditional tourist populations.

Tourism is and continues to be a significant part of the local economy, much of which is reliant on the unique environmental assets of the shire that include the Great Ocean Road and the Greater Otway National Park.

Torquay/Jan Juc is the major urban centre and the central focus of administrative function and retail and cultural activity in the municipality. Winchelsea is recognised as a rural service centre for the rural north-west.

In overall terms the Surf Coast Shire is not a relatively disadvantaged municipality, although there are isolated communities that may be more vulnerable to the harm caused by gaming including areas of high housing stress and socially isolated communities.

### **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, their family 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 Surf Coast Shire Planning Scheme encourages the provision and improvement of leisure and arts facilities; the promotion of Winchelsea as a rural service centre/mixed use activity centre and Torquay Town Centre as the administrative and retail core of the shire. Supporting the significant tourism industry is specialised tourism retailing that is promoted in identified precincts where it complements and supports other core retail activities.

State planning policy indicates that entertainment uses should be located in accessible areas like activity centres to promote sustainable development. However, the Surf Coast Planning Scheme prohibits the locating of gaming

venues in strip shopping centres and shopping complexes, which are the uses at the heart of most town centres and activity centres.

To resolve these conflicting planning issues and achieve a net community benefit, gaming venues should have the attributes of 'destination gaming', but embody principles of sustainable development. Gaming venues should therefore be located where they are accessible to persons in key population centres, particularly around activity centres and town centres, but not convenient to the retail/community core of town and activity centres to minimise impulse gambling opportunities. Gaming venues should also be 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 in the development of a set of locational principles for gaming venues. These principles focus on locating venues away from communities who are vulnerable to the negative impacts of gaming and ensuring such venues are not convenient to the community; whilst supporting the fundamental principles of sustainable development and net community benefit. In particular sustainable locations will involve:

- Being located in towns which function as a major urban settlement and service centre within the hierarchy of towns in the municipality, servicing a large population catchment and/or are experiencing significant population growth;
- Preferably some accessibility to a town or activity centre. However they should not be integrated with core areas of shopping and community facilities;
- Relatively low levels of socio-economic disadvantage; and
- Venues which offer a range of services within the proposal and are also located in areas where the community has a choice of recreational and entertainment options.

### Policy Recommendations

This document provides a draft Local Policy suitable for inclusion into the Surf Coast Shire Planning Scheme as well as the strategic justification required to pursue such an amendment. On the basis that the Municipal Strategic Statement is likely to be significantly rewritten in 2008, a number of broad thematic recommendations are made about how references to gaming as an activity and as a local policy might be inserted.

In the Municipal Strategic Statement's current format, it is recommended that broad references to entertainment and recreation infrastructure are introduced to the Economy Section at Clause 21.04 and supported by location-specific references to gaming in the township strategies at Clauses 21.10 – 21.17.

Subject to a range of criteria, the proposed local gaming policy and strategy will favour the location of EGMs in Torquay/Jan Juc over any other settlement in the Shire. In the longer term Winchelsea may also be a suitable location, when and if levels of relative disadvantage is at an appropriate level, sufficient population



growth has taken place and there are a suitable variety of non-gaming entertainment and recreation opportunities in the area. In the remaining townships gaming will be discouraged, until there is sufficient population growth and suitable non-gaming recreation alternatives available and to protect the character and tourism assets of each settlement. Within suitable towns, venues should preferably be located towards the periphery of town centres, but not integrated with shopping centres, and key community facilities or foreshore activity areas.

There are also a range of planning tools suggested, including application 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 Surf Coast Shire 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 September 2007 the Surf Coast Shire (SCS) in conjunction with the City of Greater Geelong (CGG) engaged Coomes Consulting Group to develop Gambling Planning Frameworks for each municipality. This document provides an evidence base for a Gaming Policy suitable for inclusion within the Surf Coast Planning Scheme. Section 8 of this document provides a draft 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

In 1991 the Victorian Parliament passed legislation enabling the introduction of EGMs into hotels and licensed clubs (under the *Gaming Machine Control Act 1991*). Melbourne's Crown Casino opened on 30 June 1994.

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, and 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 premises 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). Refer to Attachment 2 for a copy of the recently released details of a new Ministerial Direction on the activities that constitute community purpose.

Section 11.2.1 of the Act sets out the regulations put in place by the Act. The objective of these regulations is to provide for matters 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
  - Victorian Government Gazette – No. S277 18 October 2006
  - Sets out key parameters for the maximum permissible number of gaming machines available for gaming in Victoria and operational controls

- VCGR Determination
  - Victorian Government Gazette - No. S 318 Monday 11 December 2006
  - Permissible number of gaming machines in capped areas in Victoria
  
- Ministerial Determination
  - On 9 October 2007, the Minister for Gaming released the order that he intends to make in setting out what clubs can claim as community benefit in a community benefit statement (see Attachment 2).
  - This will replace Ministerial Direction S124 gazetted 26 June 2003.
  - The new Ministerial order will come into effect on 1 July 2008.
  
- 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 reduces 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 – Surf Coast Shire  
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 from one shopping centre in the municipality, the Surf Coast Plaza in Torquay.

Schedule to Clause 52.28-4

- Gaming machines are prohibited from all strip shopping centres throughout the Surf Coast Shire, although no specific sites are listed.

The relevant section of the Surf Coast Shire 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 that inform that location of gaming venues. These include those which have been recently adopted and incorporated into the planning scheme.

The recent Municipal Strategic Statement (MSS) review is also outlined.

A full review of these documents is provided at Attachment 5

#### 3.5.1 Surf Coast Planning Scheme

The Surf Coast Planning Scheme's MSS has recently undergone a review (in Coomes Consulting Group, *2007 Review of the Surf Coast Planning Scheme*, 2007), which builds on previous reviews recommending a significant rewrite of what is a detailed, lengthy and consequently complex MSS at Clause 21.

Although the Planning Scheme has had twenty-five planning scheme amendments since the previous MSS Review in 2003, none of these have resulted changes that have significantly reduced the length and detail at Clause 21. For this reason it is anticipated that the MSS will be significantly redrafted and possibly restructured in 2008, in keeping with the 2007 review.

#### Municipal Strategic Statement

The MSS is essentially divided into theme based matters at Clauses 21.05 to 21.09; and into location specific strategies at Clauses 21.10 to 21.17. The key messages of the relevant parts of the MSS are summarised below:

#### **Clauses 21.02 – 21.04 Council Plan, Surf Coast 2020 Vision and Strategic Framework**

- Tourism is a significant factor in the local economy, particularly in the Great Ocean Road precinct, as is the agricultural sector in the rural hinterland
- The Surf Coast Shire is strongly influenced by physical and topographical features, impacting on urban development and land use management
- Significant growth pressures in the Shire require a balance between retaining the unique character of each town and having the highest quality lifestyles and viable economic opportunities

- Managing population growth in an environmentally and economically sustainable manner is underpinned by an approach which seeks to make effective use of existing physical and social infrastructure by identifying Torquay/Jan Juc and Winchelsea as growth nodes. The strategies also emphasise the coastal and rural environs as important ‘assets’ to be protected.

#### **Clause 21.08 Tourism Strategy**

- Tourism is an important part of the local economy, particularly in coastal settlements such as Torquay/Jan Juc
- Five tourism retailing areas are identified in the coastal towns where the protection of tourism-related activities including retail is achieved by the use of a Special Use Zone (Schedule 5). This requires a planning permit for land used as a ‘shop’ subject to a condition that the premises *‘must only sell goods and services or hire goods predominantly associated with recognised tourist industries in the locality’*.

#### **Clauses 21.10 – 21.17 Township Strategies**

These strategies outline the strategic directions for Torquay/Jan Juc, Lorne, Anglesea, Aireys Inlet, Winchelsea, Moriac, Bellbrae and Deans Marsh.

##### **Torquay/Jan Juc**

- Torquay is considered the administrative and commercial centre of the Shire
- Torquay/Jan Juc have experienced and are expected to continue to experience significant population growth
- Anticipated growth in Torquay will be accommodated through the expansion of the Torquay Town Centre.

##### **Lorne**

- Tourism is the main contribution to Lorne’s local economy
- The challenge for Lorne is to preserve its coastal township character, environmental values and scenic landscapes while managing its increasing popularity.

##### **Anglesea**

- Recognised as a ‘resort’ town with low rate of permanent residency.

##### **Aireys Inlet**

- Low rate of permanent resident population but becoming increasingly popular as a destination.

##### **Winchelsea**

- The principle agricultural centre of the Shire and has an important role to play in servicing its rural hinterland
- Experiencing steady growth and is an identified growth area
- Is promoted as a mixed-use activity centre.

##### **Moriac**

- Moriac is a small rural hamlet with the majority of the population commuting to Geelong or beyond for employment

- Development of the hamlet is constrained; physically to the north by the rail line, by individual site capabilities and the presence of surrounding productive agricultural land and operations
- Basic community facilities are available although a lack of commuter public transport and youth facilities has been identified. However given the size of the population and constraints on township development, no further significant expansion of the facilities is expected in the foreseeable future.

#### **Bellbrae**

- Relative to Bellbrae's small population base, the township has experienced some substantial population growth in recent times
- Population growth has been absorbed generally through infill development – due to the prohibitive costs of servicing. When coupled with little subdivision development, the township has experienced a steadily declining supply of allotments
- For the reasons outlined above, Bellbrae is one of the few settlements in the area to expand significantly over the years.

#### **Deans Marsh**

- At the time of writing, population statistics were unavailable for the township and it was expected that permanent numbers were very low (possibly less than 50 in the township and 300 in the hinterland); and
- Despite individual site constraints and a lack of reticulated water and sewer services in the township, Deans Marsh is anticipated to be of increasing interest to lifestylers. In particular, Deans Marsh is ideally located along the improved Deans Marsh Lorne Road (Great Ocean Road alternative), contains a thriving General Store and range of accommodation and eco-tourism ventures, and is situated in close relation to both Lorne and Winchelsea providing an accessible lifestyle living alternative.

### **3.5.2 Referenced Policies and Incorporated Documents**

Relevant policies and documents referenced and incorporated into the planning scheme include a range of local strategy plans for many of the major towns in the shire.

#### *Local Strategy Plans*

Individual township strategy plans are not reviewed here because of significant detail, however a summary is available at Attachment 5, and are discussed in depth throughout the relevant Clauses 21.10 – 21.17 of the MSS.

### **3.5.3 Other Local Policies**

This section reviews relevant policies and strategies that sit outside the Planning Scheme – some of which have been adopted by the Surf Coast Shire, and others that have not. Nevertheless these plans demonstrate the Shire's wider policy context and/or the broader influences occurring within the region.

The relevant policies are:

- *The Surf Coast Health and Wellbeing Plan, 2006 – 2009*
- *Surf Coast Recreation, 2001*
- *Surf Coast Shire Tourism Strategic Plan, 2006*
- *The G21 Geelong Regional Plan: A Sustainable Growth Strategy*

*Surf Coast Health and Wellbeing Plan, 2006 - 2009*

The Plan attributes the following matters that Council has a role in creating:

- Safe and healthy places to live
- Social networks and support services
- Opportunities to participate in decisions affecting the community
- Good infrastructure such as land use schemes

The Plan identifies a number of key issues that include:

- Social isolation of farming communities and sea/tree change communities
- Lack of public transport
- Planning for young people, aged and disabled

*Surf Coast Recreation, 2001*

- The report provides an audit of community facilities and particularly recreational facilities, clubs and open spaces. It highlights that many communities in the rural areas have to travel long distances to access a range of recreation facilities and community services
- The plan identifies that there is currently a lack of adequate community and recreation facilities across the shire

*Surf Coast Shire Tourism Strategic Plan, 2006*

The Plan sets the direction for tourism in the shire for the next five years. To do so the Plan identifies and seeks to address the strengths, weaknesses, opportunities and threats to the industry.

Amongst the Plan's findings the following weaknesses were been identified:

- Lack of public transport
- Difficulties in attracting labour force to the region particularly within Anglesea and Lorne due to high housing costs, low unemployment and limited public transport

*The G21 Geelong Regional Plan: A Sustainable Growth Strategy*

- The *Geelong Regional Plan* (GRP) is a collaborative approach to regional development across a range of fronts over a three phase planning horizon to 2050. The G21 Alliance which underscores the project consists of the region's municipalities, State Government and a variety of other stakeholders including local businesses; and
- The GRP influences a wide range of policy and actions throughout the region.

### 3.6 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 a legitimate form of recreation throughout Victoria.

From the above legislative and policy 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.
- The Surf Coast Shire is committed to providing safe and healthy places to live with appropriate social networks and support services in the community.
- Local policies support a hierarchy of townships and activity centres, with many of the facilities supporting growth focussing or locating in the Torquay Township Centre and the Winchelsea Rural Service Centre.

## 4 Applications of Gaming Machines – Victoria and Surf Coast Shire

This section reviews how legislation and regulation have managed the implementation of gaming in Victoria and Surf Coast Shire.

### 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 that 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 2007 the State of Victoria had a total of 29,779 EGMs. Of these, 2,500 are located at Crown Casino. A further 27,279 machines operate in 522 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).

Date	Adult population	No. of Venues	No. of EGMs	Net EGM expenditure	Average no. EGMs per 1,000 adults	Average no. adults per venue	Average net EGM expenditure per adult
30/06/2000	3,531,882	536	27,408	\$2,170,581,995	7.76	6,589	\$615
30/06/2001	3,572,889	537	27,444	\$2,366,016,584	7.68	6,653	\$662
30/06/2002	3,679,669	534	27,400	\$2,562,820,950	7.45	6,891	\$696
30/06/2003	3,720,628	532	27,260	\$2,334,294,514	7.33	6,994	\$627
30/06/2004	3,816,854	530	27,132	\$2,290,929,976	7.11	7,202	\$600
30/06/2005	3,870,537	523	27,124	\$2,393,030,966	7.01	7,401	\$618
30/06/2006	3,924,728	521	27,147	\$2,472,451,853	6.92	7,533	\$630
30/06/2007	3,979,244	522	27,279	\$2,543,175,356	6.86	7,623	\$639

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.

Source: VCGR Website, [www.vcgr.vic.gov.au](http://www.vcgr.vic.gov.au)

#### 4.1.2 Regional Caps

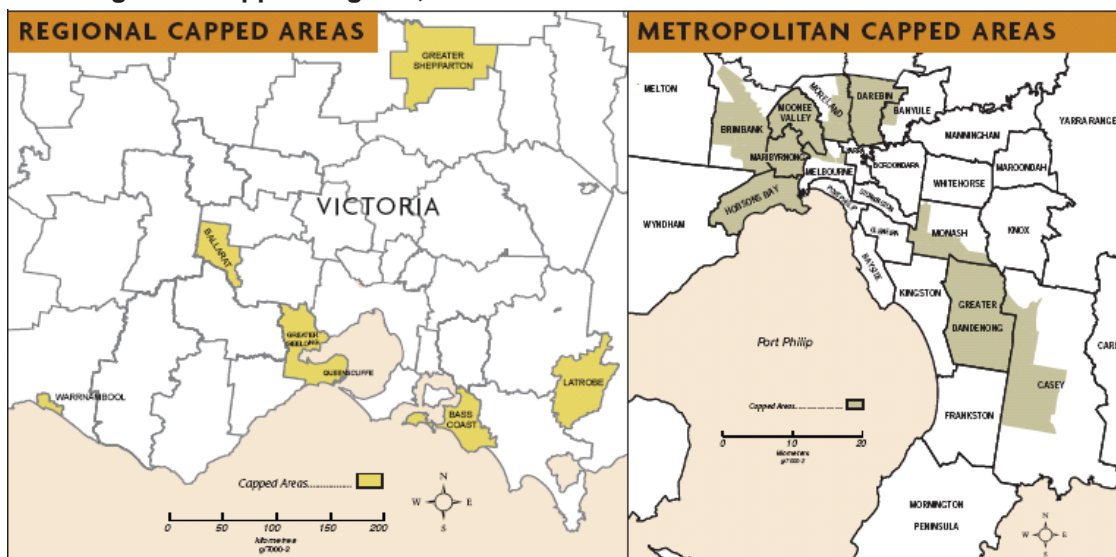
Regional caps are a way of setting limits on the number of gaming machines that can be available for gaming in certain specified areas. The capped regions cover parts of the identified municipalities that are considered to be most at risk, based on a high level of disadvantage, significant density of 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 2005, 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



Source: *Taking Action on Problem Gambling*, 2006

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. It is estimated that this will result in the removal of approximately 540 machines; however this will be dependent on the existing number of machines and the population within each region.

This requirement has meant the removal of machines from some areas where this density is higher. Many uncapped 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. There are currently 6.86 gaming machines per thousand adults in Victoria.<sup>1</sup>

#### 4.1.4 Gaming Expenditure in Victoria

Average expenditure on EGMs across Victoria was \$639 per adult per year<sup>2</sup> (refer to Table 1 above). Using 2006 census data, real expenditure per adult in 2006 was calculated at \$654, higher than VCGR estimates for 2006 (\$630).

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).

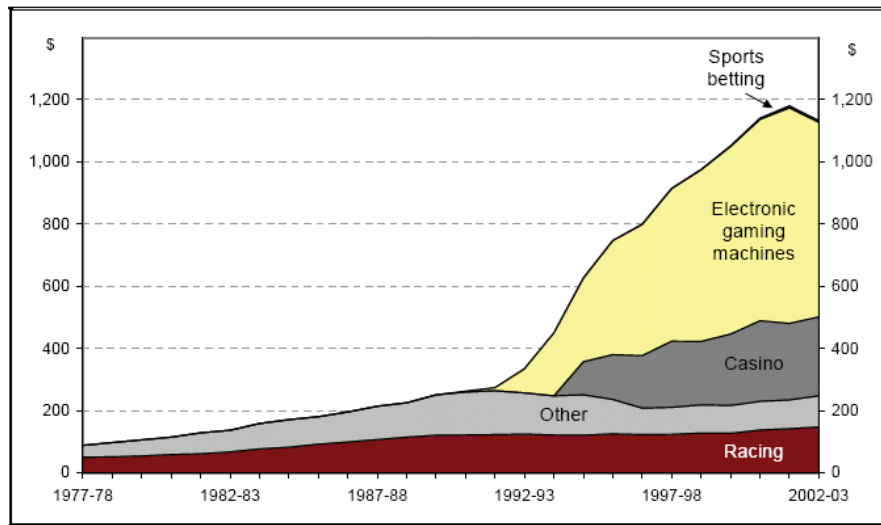
Victorian gambling expenditure has grown at a phenomenal rate during the past decade. In particular, the five-year period ending in 1997-98 (which followed the introduction of EGMs and included the opening of the Crown Casino) saw expenditure as a percentage of household disposable income more than double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

<sup>1</sup> As calculated by the VCGR from DSE population projections for 2007

<sup>2</sup> As calculated by the VCGR from DSE population projections for 2007



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



Source: VCRP 2005

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.

## 4.2 Surf Coast Shire

### 4.2.1 Electronic Gaming Machine Numbers

In 2007, Surf Coast Shire has a total of 111 gaming machines accommodated in 4 venues (refer Table 2 and Figure 3).

Name and Address	No. EGMs	Type	Operator
Anglesea Golf Club Golf Links Road Anglesea	34	Club	Tabcorp
Lorne Hotel 176 Mount Joy Parade Lorne	22	Hotel	Tattersall's
Torquay Golf Club 1 Great Ocean Road Torquay	40	Club	Tattersall's
Torquay Hotel	15	Hotel	Tabcorp
<b>TOTAL 4 Venues</b>	<b>111</b>		

Source: VCGR, 2007

Figure 3 EGM Venues in the Surf Coast Shire



Legend  
● EGM Venue

Knowledge Creativity Performance  
Engineering Surveying Planning Urban Design Landscape Architecture  
Sustainability and Environment Agribusiness Project Management

**Surf Coast Shire**

Drawing No 133167 Date October

Coomes Consulting Group Pty Ltd – A subsidiary of Downer EDI  
Melbourne Shepparton Bendigo Albury Geelong

Engineering Surveying Planning Urban Design Landscape Architecture  
Sustainability and Environment Agribusiness Project Management Strategic Consulting



EGM Venues

coomes consulting



© Coomes Consulting Group Pty Ltd

#### 4.2.2 Regional Caps

Surf Coast Shire is not a capped region. However, the universal caps do apply which allow a maximum of 10 gaming machines per 1,000 adults.

#### 4.2.3 EGM Density in Surf Coast Shire

In 2007, Surf Coast Shire had a density of 6.06 EGMs per 1000 adults<sup>3</sup>, lower than the country density of 6.97 EGM per 1000 adults. Currently all the townships that have EGMs, which are Anglesea, Lorne and Torquay, have densities that are above the country and Victorian densities. Lorne is considerably high with 26 EGMs per 100 adults which is nearly four times as high as the country density of 6.97.

Adult Population Projections (18+)	EGMs	Venues	EGMs per 1000 adults
23,995	111	4	6.06

Source: VCGR database using DSE population projections for Surf Coast Shire

Please note the above figures were ascertained from the VCGR database and have been calculated using population projections.

Using 2006 Census data, the EGM density of townships with existing EGMs has been calculated in Table 4.

Township	No. EGMs	No. Venues	Adult Population(18+)	EGMs per 1000 Adults (18+)
Anglesea	34	1	1,815	18.7
Torquay	55	2	5,040	10.9
Lorne	22	1	830	26.5
Surf Coast Shire	111	4	16,262	6.6
<b>Country</b>	<b>7447</b>	<b>188</b>		<b>6.97</b>
<b>Victoria</b>	<b>27,147</b>	<b>521</b>	<b>3,780,057</b>	<b>7.18</b>

Source: VCGR 2007, ABS, 2006

It should be noted that these figures represent the permanent residents of the Shire and do not account for the considerable increase in population numbers during the peak holiday periods.

<sup>3</sup> As calculated by the VCGR from DSE population projections for 2007

#### 4.2.4 Gaming Expenditure in Surf Coast Shire

During 2006/07 Surf Coast Shires net EGM revenue was \$4,891,876.42. This is approximately \$267 per adult population (18+) based on VCGR's population projections for 2007. This result is lower than both the average expenditure for country Victoria and the state wide expenditure, but demonstrates an increase per adult within the shire since 2005/6 when it was \$262.

Table 5 outlines the details of gaming machine expenditure in Surf Coast Shire during the 2006/2007 financial year.

	2007 Population Projection	2007 Population Projection (18+)	Venue No.	EGM No.	Total Net Expenditure	Net EGM expenditure per adult
Surf Coast Shire	23,995	18,305	4	111	\$4,891,876.42	\$267
Country	1,407,820	1,068,389	188	7,447	\$1,068,389	\$505
Victoria	5,129,445	3,979,244	522	27,279	\$3,979,244	\$639

Source: VCGR, 2007

#### 4.2.5 Community Benefit of Gaming to Surf Coast Shire

##### **Community Support Fund**

The Community Support Fund (CSF) was established to ensure that a portion of Government revenue from gaming machines within hotels is used to fund projects that support communities. It aims to particularly address issues in areas of disadvantage, and has a major commitment to fund community building programs as well as providing support directly to community organisations who apply through the CSF grants program (DVC, 2006).

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).

Information on exactly how much gaming revenue from particular municipalities is returned to local communities through the CSF fund is not available, making it difficult to quantify the exact community contributions that are made by local hotels to the Shire.

##### **Community Benefit Statements**

The purpose of Community Benefit Statements (CBS) is for EGM venues owners to demonstrate the extent to which the revenue from EGMs has been used for community purposes.

Last financial year in the Surf Coast Shire, 28.59% (\$810,003) of the net gaming revenue raised across the municipality was claimed for community benefit (refer Table 6). This figure is similar to other municipalities within this region.

<b>Table 6: Community Benefit Statement 2006-2007, Surf Cost Shire</b>	
Number of CBS lodged: - Clubs (2)	
2006-2007 Net Gaming Revenue (NGR) - \$2,833,413	
<b>Community Benefit Statement Claims</b>	<b>Clubs \$</b>
<b>Category 1</b> Employment Expenses	506,635
<b>Category 2</b> Gifts of Funds	172
<b>Category 3</b> Sponsorships	-
<b>Category 4</b> Gifts of goods to the community	-
<b>Category 5</b> Voluntary services provided to the community	75,420
<b>Category 6</b> Volunteer expenses	-
<b>Category 7</b> Activities subsidised	38,853
<b>Category 8</b> Fixed assets provided	63,326
<b>Category 9</b> Direct and Indirect costs	125,597
<b>TOTAL</b>	<b>810,003</b>
<b>% of NGR claimed for Community Purposes – Surf Coast</b>	<b>28.58</b>
<b>Comparison with other municipalities in this region</b>	
% of NGR claimed for Community Purposes – Colac-Otway Shire	32.44
% of NGR claimed for Community Purposes – Moorabool Shire	25.00
% of NGR claimed for Community Purposes – City of Greater Geelong	23.48
% of NGR claimed for Community Purposes – Corangamite Shire & Borough of Queenscliff	30.49

Source: VCGR, [www.vcgr.vic.gov.au](http://www.vcgr.vic.gov.au)

Note: Hotels were not required to lodge a CBS in 2006-7.

Over recent years there have however been various concerns expressed by local government about how the benefits of gaming revenue are reported and distributed back to local communities, particularly in relation to business operating costs being included as community benefits.

Due to this widespread discontent with the CBS 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 were that what constitutes a community purpose no longer includes employment, rent, service costs or subsidised meals.

On 9 October 2007, the Minister for Gaming released a revised order setting out what clubs can claim as community benefit in a CBS (see Attachment 2). The new Ministerial order will come into effect on 1 July 2008. This reduces the ability of clubs to claim indirect community benefits as part of the CBS.

Therefore this will alter the types of community benefits attributed to gaming from 2008, compared with those listed in Table 6.

## 5 Surf Coast Shire Local Context

To apply the legislative context and relevant research on principles of this strategy to the circumstances of Surf Coast Shire, it is necessary to briefly appreciate the local context and development trends in 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
- Development and Growth Trends

### 5.1 Surf Coast Shire Socio-Economic Profile<sup>4</sup>

#### 5.1.1 Income

Overall, in 2006, incomes within Surf Coast Shire were relatively high with the median weekly household income of \$1055, above the state average of \$1022. The median individual weekly income of \$481 is similarly above the state average of \$456. Incomes are particularly high within Bellbrae, Gherang, Gnarwarre and Moriac where median weekly household incomes are all above \$1200 and median weekly individual incomes are above \$500.

Although overall incomes within Surf Coast are higher than average there are also areas of lower incomes. Median weekly household incomes were below average within Anglesea (\$787), Aireys Inlet (\$869), Birregurra (\$745), Lorne (\$842) and Winchelsea (\$747). This is partially due to the high proportion of retirees and lone person households within these areas.

#### 5.1.2 Industry and Employment

The predominant employer within the Surf Cost Shire is construction which employs 11.7% of the population. This is closely followed by retail trade (11%), education and training (10.9%), public administration and safety (9.8%), accommodation and food services and manufacturing (8.8%). The large proportion of retail and manufacturing employers are mainly a result of tourism within the coastal townships and the manufacturing and retail trade are associated with the surfing industry (refer Table 7).

**Table 7: Major Industries within Surf Coast Shire**

Industry	% Surf Coast Population
Manufacturing	8.8
Construction	11.7
Retail Trade	11
Accommodation and food services	8.9
Public administration and safety	9.8
Education and training	10.9

Source ABS, 2006

However, as 22.4% of the Surf Coast population are professionals, this does suggest that there are a large proportion of residents who work outside the Shire.

<sup>4</sup> Information sourced Australian Bureau of Statistics Census of Population and Housing 2006  
© Coomes Consulting Group page 29

In 2001, 57.8% of residents worked outside the Surf Coast Shire, with 37.6% of these working within Geelong.

### 5.1.3 Unemployment

Unemployment levels are relatively low within Surf Coast Shire, with the overall unemployment rate of 2.4%, lower than the state unemployment rate of 3.2%. However, labour force participation is significantly below the state averages within the townships of Fairhaven (33.4%), Anglesea (53.4%), Aireys Inlet (52.9%), Lorne (52%) and Winchelsea (53.7%). The low labour force participation yet also low unemployment rate suggests that there are a large number of the population who have dropped out of the workforce completely. As there are a large proportion of people aged over 65 within these townships these figures are also most probably as a result of the large proportion of retirees who are residing within these areas.

### 5.1.4 Education

Education levels within Surf Coast are slightly higher than state averages. The proportion of the population that have completed year 12 of schooling or equivalent is 44.6% which is similar to the state average of 44%. Tertiary education is also slightly higher. The proportion of the population who have completed post secondary education within Surf Coast is 79.6% compared to 75.7% for Victoria.

However, education levels within Winchelsea are particularly low. The proportion of residents who have completed year 12 or equivalent is 25.4% which is nearly half the state average. However, 70.3% of the population have completed post secondary education. This figure coupled with the high proportion of Surf Coast residents who work within the construction industry (11.7%) suggests that many may have left school early to complete apprenticeships.

### 5.1.5 Age Structure and Household Type

The Surf Coast Shire has a diverse age profile with a high proportion of residents aged under 30 as well as a considerable number aged over 65. This reflects the large number of retirees and young families within the region. There is a high proportion of young people (proportion aged under 30) living within Moriac (44.6%), Jan Juc (42.3%), Winchelsea South (41%) and Inverleigh (40%), whereas there is an older age profile (proportion aged over 65) within Lorne (23.9%), Anglesea (22%), Aireys Inlet (19.5%), Fairhaven (19.7%) and Winchelsea (18.4%).

Overall, 20% of the Surf Coast population live in lone person households, which is lower than the state average of 23%. However, there are higher than average proportions of lone person households within Anglesea (28.8%), Aireys Inlet (27.4%), Birregurra (33.2%) and Winchelsea (24.3%). Often people who live in lone person households are more likely to feel socially isolated, particularly if they live in areas that in themselves are isolated towns.

### 5.1.6 Housing Costs

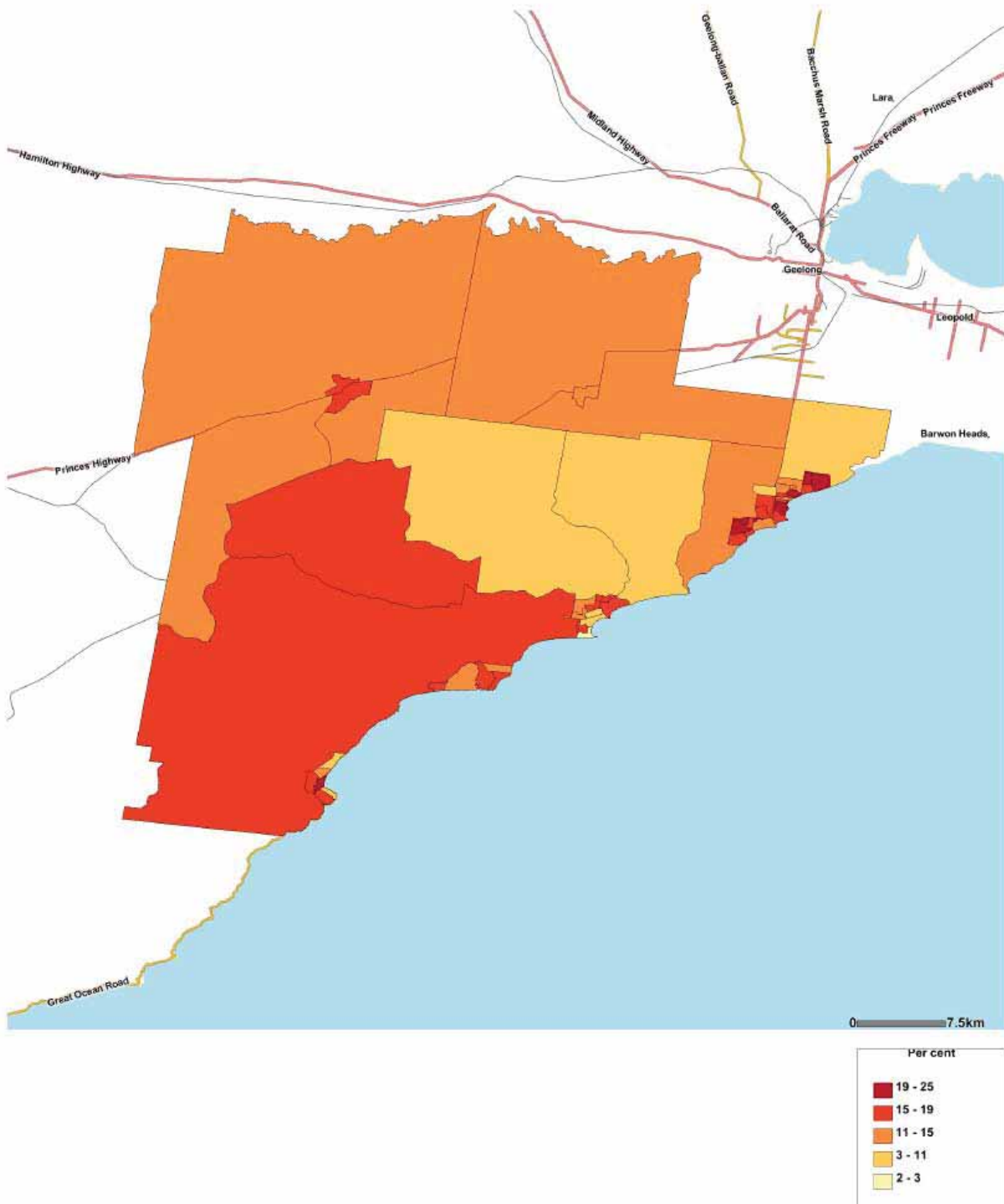
The median monthly housing loan repayment within Surf Coast Shire of \$1,270 is only slightly above the state average of \$1,252. However, housing repayments are considerably higher within Aireys Inlet (\$1,473), Bellbrae (\$1,500), Gnarwarre (\$1,450), Freshwater Creek (\$1,354) and Torquay (\$1,343).

Partially as a result of these high housing costs there is evidence that the Surf Coast Shire is experiencing high levels of housing stress and is one of the least affordable regional municipalities in the state. High levels of housing stress are particularly evident within the southern region of the shire and Torquay/Jan Juc where housing stress levels are between 15% and 25% (refer Figure 4) The '*Surf Coast Housing Strategy, 2006*' states that housing costs have increased substantially during the past 5-6 years with some areas experiencing a 250%+ increase and an average over the entire Shire of 130%.

High housing costs also impact upon attracting adequate labour force to locate within the region. The *Surf Coast Shire Tourism Strategic Plan* notes that areas such as Lorne and Anglesea are under high development pressure as a result of high housing costs and this is impacting upon attracting workers to locate within the area as they are often unable to afford housing within these regions. This is reiterated within the *Surf Coast Health and Wellbeing Plan 2006-2009* that identifies that the recent 'housing boom' has had a considerable impact on the region. It highlights that in Lorne service industry workers are often unable to live locally as a result of high housing prices and this has placed more pressure on the inland township of Deans Marsh. This is not only an economic issue but a social issue, as it can fragment the community, particularly smaller townships as there are fewer people who live and work within the towns.



Figure 4: Proportion of Households Suffering Housing Stress<sup>5</sup> within Surf Coast Shire



Knowledge Creativity Performance  
Engineering Surveying Planning Urban Design Landscape Architecture  
Sustainability and Environment Agribusiness Project Management

© Copyright Commonwealth of Australia & PSMA Australia 2007

<sup>5</sup> Housing Stress is households with housing costs more than 30% or more of gross income

### 5.1.7 Disadvantage

The *Index of Relative Socio-Economic Disadvantage* (SEIFA, 2001) 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). To maintain consistency with the other indexes, the higher an area's index value for the Index of Relative Socio-Economic Disadvantage, the less disadvantaged that area is compared with other areas (Australian Bureau of Statistics, 2001).

According to SEIFA, the Surf Coast Shire is a relatively advantaged municipality with a SEIFA score of 1,064. The majority of townships within the municipality are well above the average of 1000, yet Winchelsea is disadvantaged with a score of 903. Table 8 and Figure 5 detail the distribution of disadvantage across the Shire.

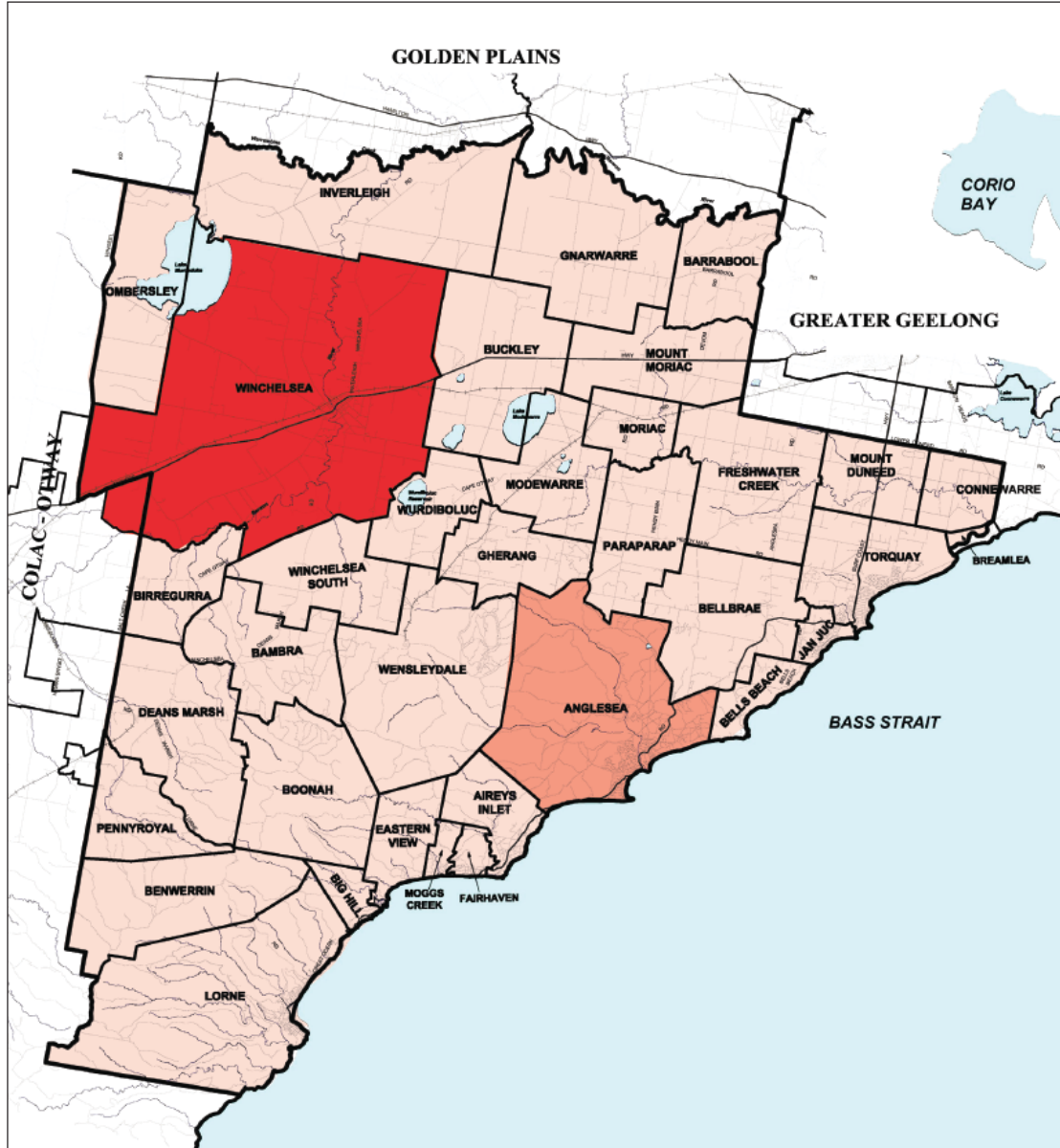
**Table 8 SEIFA Index Surf Coast Shire**

Region	SEIFA Index
Aireys Inlet/Fairhaven	1,078
Anglesea	1,047
Jan Juc	1,079
Lorne	1,060
Moriac	1,076
Torquay	1,061
Winchelsea	903
Rural Surf Coast	1,095
Surf Coast Shire	1,064
<b>Victoria</b>	<b>1016</b>
<b>Australia</b>	<b>1000</b>

There is also suggestion that disadvantage within rural and remote communities will increase as a result of climate change. *The G21 Regional Plan* notes climate change will significantly impact upon the wider farming community and create significant economic and social problems such as lack of income, depression and stress. This has particular relevance for the Surf Coast West Statistical Local Area which encompasses the rural hinterland as the agriculture, fisheries and forestry industry contributes 10.3% of the industry within the area and would be highly vulnerable to any negative economic and social effects of climate change.

Financial stress and being isolated or disconnected are identified as factors which can increase a community's vulnerability to the negative impacts of gaming (Livingstone 2006, PC 1999).

Figure 5: Surf Coast Shire SEIFA rating of Relative Disadvantage



Legend

- 900 – 950 (highest disadvantage)
- 951 – 1001
- 1002 – 1052
- 1053 – 1103 (least disadvantage)

Surf Coast Shire

Drawing No 133167 Date October

Coomes Consulting Group Pty Ltd – A subsidiary of Downer EDI  
Melbourne Shepparton Bendigo Albury Geelong

Engineering Surveying Planning Urban Design Landscape Architecture  
Sustainability and Environment Agribusiness Project Management Strategic Consulting

coomes consulting



© Coomes Consulting Group Pty Ltd

SEIFA Index

Knowledge Creativity Performance  
 Engineering Surveying Planning Urban Design Landscape Architecture  
 Sustainability and Environment Agribusiness Project Management

### 5.1.8 Cultural Diversity

Surf Coast is not a culturally diverse population compared to other regions in Victoria. The proportion of Surf Coast residents who speak English at home is 92% and only 16.7% of residents were born overseas. However, it is noted within the *Health and Wellbeing Plan* that residents who move into the region may experience a higher degree of social isolation and feelings of difference as a result of the low cultural diversity within the region.

### 5.1.9 Vulnerability of men to gaming within Surf Coast

A study conducted by Bethany Community Support about '*emotional needs of males living in the Surf Coast Shire: analysis and service model*' found through consultations with the community that men in Surf Coast experienced

- high levels of alcohol and other drug use
- stress associated with financial commitment, particularly as a result of high mortgages
- difficulty in achieving a work/life balance
- isolation, particularly amongst new residents
- grief through loss of relationships
- family violence

The Bethany report also identified that pubs, golf courses and RSLs were important places where men could make social links with the community. Gaming venues are located within clubs and pubs which often increases the vulnerability of people who use these facilities as a social outlet.

### 5.1.10 Transport

Public transport provision within the municipality is very low with some townships not served at all. This is highly evident when looking at the methods in which Surf Coast residents get to work. 69.3% of the population use a motor vehicle to get to work whereas only 1.1% of the population use public transport. The *Surf Coast Housing Strategy* highlights that the increase in fuel costs will have a significant affect on the affordability of more isolated townships such as Lorne and particularly Deans Marsh and Moriac where there is no public transport.

The lack of public transport also affects the viability of the tourist industry within the region as many tourists rely on public transport. The *Surf Coast Tourism Strategic Plan* raises this matter, highlighting the lack of public transport as a key 'weakness' for the region, particularly transport for backpackers, young people and the elderly.

Poor public transport provision can increase social isolation and financial costs, creating locational disadvantage for areas that lack public transport.

## 5.2 Development and Growth Trends

### 5.2.1 Significant growth within Surf Coast Shire

The region is experiencing significant growth, with nearly every town in the shire expected to increase in population by 2021. Torquay is expected to be the main area where this growth will occur, with a projected average annual growth rate of 5.09% between 2006 and 2021 (refer Table 9).

**Table 9: Population Forecasts for Surf Coast Shire**

	2006	2016	2021	Average annual % change
Anglesea	2,681	3,077	3,225	1.24
Jan Juc-Bellbrae- Bells Beach	4,466	4,566	4,528	0.09
Lorne- Aireys Inlet- Deans Marsh	3,435	3,941	4,112	1.21
Moriac-Rural East	2,710	3,139	3,369	1.46
Torquay	8,020	14,116	16,881	5.09
Winchelsea-Rural West	2,813	3,371	3,666	1.78
<b>Surf Coast Shire</b>	<b>24,124</b>	<b>32,209</b>	<b>35,781</b>	<b>2.66</b>

Source: Id Forecasting, 2007

### 5.2.2 Large Tourist Population

The Surf Coast Shire has a number of coastal townships that are popular and attract large tourist populations in the summer. In 2004, the Surf Coast Shire received an estimated 1.5 million visitors to the region, with 50% of these being day-trippers (Surf Coast Shire, 2006). The economic impact of tourism is high. In 2002, international and domestic visitors spent \$257 million within the shire with an estimated 930 jobs being generated by tourism, accounting for 10.6% of the total employment within the shire.

### 5.2.3 Sea-Change and Lifestyle Living

The Surf Coast Shire has experienced some significant population growth in recent times. Table 9 illustrates the municipality is likely to see this pattern continue, with coastal townships, particularly Torquay, experiencing some of the greatest gains in the period to 2021.

The sea change concept, the attraction of residents to living in or near coastal areas, is a significant draw-card for the Shire, and is a factor attributable to the increasing permanent resident populations and traditional tourist/absentee visitors in the coastal townships. In addition, and for a range of reasons including housing affordability, there appears to be increasing interest in the coastal and rural hinterland areas of Deans Marsh and Winchelsea, respectively. It is likely that as

housing costs rise in the high profile coastal towns, this preference will become more popular.

#### **5.2.4 Preferred Growth Areas**

The Surf Coast Shire Planning Scheme establishes a clear policy position about the containment and encouragement of urban growth, particularly residential development, within existing townships, namely Torquay/Jan Juc in respect of coastal areas and Winchelsea in the rural north-west.

The identification of Torquay/Jan Juc and Winchelsea as the preferred growth areas forms part of an overall strategy to preserve the character of existing townships within the shire while encouraging overall growth. (Refer to Figure 6 in Section 8.7 which sets out the strategic location factors for gaming machines)

---

## 6 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.

Research has 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.

### 6.1 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 *Regional Electronic Gaming Machine Caps Review Panel* ("Caps Review 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")
- 1999 Productivity Commission *Australia's Gambling Industries*, ("PC 1999")

- 1999 Australian Medical Association *Submission to the Productivity Commission Inquiry into Australia's Gambling Industry*
- 1999 KPMG Consulting, *Longitudinal Community Impact Study* ("KPMG 1999")
- 1999 Market Solutions. *Hotel and Club Industry Gaming Impact Study: Final Report* ("Market Solutions 1999")
- 1999 Doughney, J & Kelleher, T. *The Impact of Poker Machine Gambling on Low Income Municipalities – A Critical Survey of Key Issues*
- 1997 Victorian Commission for Gambling Regulation (VCGR) *Impact of Electronic Gaming Machines on Small Rural Communities*
- 2000 Australian Institute for Gambling Research. *The Impact of the Expansion of Gaming on the Tourism, Entertainment and Leisure Industries* ("AIGR, 2000")

Refer to Section 10 - References for full reference titles and a comprehensive 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 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.
  
- There is no appreciable relationship between the introduction of EGMs to hotels and clubs and patterns of interstate and international tourism, although it has changed patterns of intrastate tourism. However factors other than gaming are likely to more strongly influence the tourism sector (AIGR, 2000)

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
- Gaming in itself is unlikely to be a tourist drawcard.

The above research is examined in greater detail at Attachment 4

## 6.2 Planning Considerations

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

### 6.2.1 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 activity centres.

### 6.2.2 Activity Centres and Tourism

Under Clause 17.01 of the Surf Coast Planning Scheme, the State planning policy objective for activity centres 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.*

In a number of locations the Surf Coast MSS is explicit about the conflict between development pressures in the Shire and the preservation of individual township character, particularly in respect of tourism. In regard to activity centres, the strategies pursued include '*promoting the role of Torquay Town Centre as the commercial and cultural heart of the Shire*' (Clause 21.04-3), '*To identify*

*Winchelsea as a priority rural population growth node...consolidating its role as a rural service centre...* (Clause 21.04-3) and by the protection of tourist retailing in 'Tourism Development Precincts' in the high profile locations of Torquay, Lorne and Anglesea through the promotion of 'a focus for tourist activity that complements and supports core retail activities elsewhere in the relevant township' (Clause 21.08-2).

### 6.2.3 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.

The maintenance and improvement of broad leisure and arts facilities is encouraged under the Surf Coast Planning Scheme, acknowledging that presently residents 'enjoy a wide range of active, non-structured and individual leisure pursuits' (Clause 21.06-4).

### 6.2.4 Retail

Central to activity centres policy is the notion of retail. However, the planning provisions at Clause 52.28 of the Victoria Planning Provisions specifically discourage gaming facilities to locate within shopping areas. 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<sup>6</sup> 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

---

<sup>6</sup> Now under the jurisdiction of VCAT

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”*

### 6.3 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 low socio-economic disadvantage. In this sense, a gaming venue should be **accessible** (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 Surf Coast Planning Scheme encourages a range of leisure and arts facilities.
- The Surf Coast Planning Scheme promotes Winchelsea as a rural service centre, Torquay as the commercial and cultural heart of the Shire. It also seeks to protect retail tourism in the Tourism Development Precincts where they are considered to complement and support key retail activities elsewhere in the township.
- However, the scheme also prohibits the locating of gaming venues in strip shopping centres and shopping complexes, both of which are common features 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 achieve this, venues should:

- Be located in towns which function as a major urban settlement and service centre within the hierarchy of towns in the municipality, servicing a large population catchment;
- Preferably have some accessibility to a town or activity centre, but not be integrated with core areas of shopping and community facilities;
- Be located in areas with relatively low levels of socio-economic disadvantage; and
- Offer a range of non-gambling activities within the proposed venue and be located in areas where the community has a choice of recreational and entertainment options.

These matters are discussed further in the location principles set out in Section 7.

---

## 7 Locational Principles for Gaming

This section sets out key location principles for gaming machines and the rationale for those principles. Primary location criteria indicate the 'initial 'big picture' locational issues to be considered. Detailed location criteria then provide more specific direction as to appropriate sites within a local area, once the broad primary criteria have been satisfied.

### Primary location criteria

1. Gaming machines should be located in towns which function as a major urban settlement and service centre within the hierarchy of towns in the municipality and service a large population catchment.
2. Gaming machines can be located in areas remote from townships and urban growth centres if associated with a sports and recreation club with an extensive land holding.
3. Gaming machines should not locate in areas of relative socio-economic disadvantage.
4. Gaming machines should be located in towns which can accommodate additional gaming because:
  - a. residents also have a choice of other types of non-gaming entertainment and recreation facilities in the local area, particularly alternative clubs or hotels; and
  - b. there are limited existing gaming opportunities for residents, or identified future residential growth capacity.
5. Proposals should demonstrate that the provision of gaming machines in a particular location will achieve a net community benefit.

### Detailed location criteria

6. 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, foreshore activity areas, and major community facilities involving a high concentration of people undertaking daily activities.
7. Gaming machines should not be convenient to shops.
8. 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.
9. 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.

## 7.1 Rationale for Principles

### 7.1.1 Shops

*Principle 7: 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 7 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.

### 7.1.2 Macro locational attributes

*Principle 1: Gaming machines should be located in towns which function as a major urban settlement and service centre within the hierarchy of towns in the municipality and service a large population catchment.*

*Principle 2: Gaming machines can be located in areas remote from township and urban growth centres if associated with a sports and recreation club with an extensive land holding.*

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

- residents also have a choice of other types of non-gaming entertainment and recreation facilities in the local area, particularly alternative clubs or hotels; and*

- b. there are limited existing gaming opportunities for residents, or identified future residential growth capacity.*

As proposed by Principle 1, there are a number of reasons why it is considered more appropriate to direct gaming machines towards larger towns in a municipality like the Surf Coast Shire. Firstly it sits comfortably within the overall strategy to manage land use and urban development in the Shire. The Housing and Settlement strategy set out in the MSS promotes growth in the major towns of Torquay and Winchelsea and away from coastal townships. It follows then that the location of entertainment and recreation facilities should also be in those areas where urban development is concentrated and expected to grow. This aligns with the settlement hierarchy of a rural municipality, whereby community services and commercial development are concentrated in larger urban centres, which then service a broad catchment area.

Such a model is also supported by the research on the relationship between location of gaming venues and impact on communities, by protecting smaller townships where it is likely to be less appropriate to locate gaming venues. For example the ANU has conducted research examining the catchment areas of gaming venues, and although this was done in a suburban context, its findings are of interest and relevance. The report concluded that in general terms, clubs which draw their patrons from a more localised catchment have patrons with heavier gambling profiles than those with a wider reach into the surrounding area. It also found that clubs with spatially extensive catchments were typically located close to large areas of community congregation.

It is also considered advantageous to locate gaming machines in areas where there are a choice of entertainment options, which is less likely to occur in a small rural town. 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, Principle 4 encourages 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 go to entertainment venues, without being exposed to gaming.

Consumer Affairs Victoria (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 study of the impact of gaming machines on small rural communities (VCGR 1997b) also 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. These complexities were illustrated by the *Branbeau Pty Ltd v Victorian Commission of Gambling Regulation 2005* decision, where the Tribunal stated that it was not aware of evidence on the impact of a new gaming venue on problem gambling when residents already have good access to gaming opportunities. This finding was made despite the VCGR arguing the possibility of increased risks of harm to problem gamblers or people at risk of problem gambling because of the opening of a new venue in a location 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 directs gaming machines towards areas with limited existing gaming opportunities, or where the population is likely to grow. This is premised on the theory that gambling consumption is higher in areas of high EGM densities, which 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.” In again 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.

Finally Principle 2 recognises the reality that it is not feasible for all clubs to locate within towns or around town 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.

### **7.1.3 Socio-economic disadvantage**

*Principle 3: Proposals for gaming machines should not locate in areas of relative socio-economic disadvantage.*

It has been demonstrated in a range of 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. This is also in keeping with the objectives of the Gambling Regulation Act which seeks to minimise harm caused by problem gambling.

#### 7.1.4 Destination gaming versus convenience gaming

*Principle 6: 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, foreshore activity areas, and major community facilities involving a high concentration of people undertaking daily activities.*

In respect of the location of gaming venues, 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 or travel by non-car modes. 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 other sustainability and settlement policies.

It is therefore considered that encouraging gaming machines to establish within townships, preferably proximate to tourism precincts and town centres, but not in areas of high pedestrian activity where convenience gaming could be encouraged, provides for a balance between competing policy objectives.

This also 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 foreshore activity areas and shopping centres, will also minimise the likelihood of convenience gaming.

### 7.1.5 Net community benefit

*Principle 5: 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.

Although studies such as KPMG (1990) have identified a loss of revenue from local economies, for example through taxes, this must be considered along with other costs and benefits, for example any recreational value of gaming, improvements to facilities, impacts on businesses and problem gambling.

A key issue relating particularly to Surf Coast Shire, in assessing the net community benefit of EGMs, will be the weighing up impacts on the tourist population versus the resident population. It is suggested that ultimately the Shire's main considerations must relate to the resident community, rather than the impact on tourists. For one thing the number of gaming machines does not fluctuate throughout the year. Furthermore it is noted that the wording of the Gaming Regulation Act requires the VCGR to be satisfied that the "net social and economic impact of approval will not be detrimental to the well-being of the community of the municipal district in which the premises are located." (s.3.3.7). The gaming regulator has considered that the wording of this clause excludes tourists from the definition of "community" (for example see the determination by the former VCGA in relation to the Lakes Entrance RSL Club – Matter 2001/30).

### 7.1.6 Compatibility with surrounding land uses

*Principle 8: 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.

While this principle can relate to the potential impact of a gaming venue on the amenity of nearby sensitive uses, such as residential areas, this should not be seen as encouraging gaming machines and associated uses to be located in

industrial areas either. Such areas are unlikely to be appropriate both in terms of being difficult to access by a variety of transport modes and especially unsafe after hours for non-vehicle users.

In Surf Coast Shire it is also important that gaming venues and associated uses are located where they will complement, and not compromise the key tourism assets of the Shire, including environmental assets and tourist retailing. Research (AIGR, 2000) would seem to suggest that gaming in itself is unlikely to be a major drawcard, and as such gaming venues should be carefully located so as not to intrude on more significant tourist attractions, including the attractive coastal character of towns along the Great Ocean Road.

#### **7.1.7 Preferred attributes of gaming venues**

*Principle 9: 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.*

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 number 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 any particular 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.

---

## 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.

Due to 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.
- Certain detailed venue or EGM design features (such as location of ATMs, spin rates and so on).
- Advertising of gaming.

It is also not considered appropriate for a local policy to specifically deal with issues associated with gaming venues on Council owned land. There is no planning reason why an applicant for EGMs on Council land should be treated differently to an applicant on private land. It is recommended that if Council is concerned about this issue, it explores how they best use their position as land owner, through lease agreement conditions or any other viable means, to ensure that occupiers meet the Council's expectations of appropriate uses on municipal land.

In relation to managing or directing community contributions, 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, 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 Further responsible gaming work

There may be merit in carrying out further responsible gaming work outside the limitations of the planning scheme to further establish and maintain Council's position on gaming in the broader whole-of-Council policy context. Work of this nature provides an opportunity for Council to support and reinforce the policy position established in this Gaming Policy Framework and the subsequent draft Gaming Policy beyond the planning process. In particular, given the significant success already gained from regional approaches in other policy areas throughout the G21 region, the establishment of an Action Plan Committee with adjoining municipalities could facilitate a co-ordinated regional approach to gaming in the Barwon Region. Moreover, the existing partnership with the City of Greater Geelong on the Gaming Policy Framework places both Councils in a good position to expand on existing efforts. There may also be additional benefit in adopting a *Responsible Gaming Policy* that sits outside the planning scheme and outlines the Shire's broader policy position on gaming.

Given the regional cap that exists within Greater Geelong (which encompasses the neighbouring municipalities of the City of Greater Geelong and the Borough of Queenscliff) limiting the total number of electronic gaming machines that may be established throughout the region, the likely redistribution of machines could result in increased pressure to establish machines within the Surf Coast Shire. For this reason it is recommended that further responsible gaming work seeks to achieve the following broad outcomes:

- Effective, co-ordinated information sharing between municipalities;
- Consideration of the appropriate redistribution of machines on a regional basis; and
- The establishment and monitoring of meaningful responsible gaming practices by venue operators.

## 8.3 Municipal Strategic Statement Format and Content

The 2007 MSS Review established that the existing MSS is '*a comprehensive document with a logical structure of themes and location based considerations*<sup>7</sup>' that is generally consistent with the State Planning Policy Framework (SPPF). However the study also concluded the document is also one of the '*largest and most complex schemes....weakened by the volume of information, repetition of themes and subjects and the fractured location of information about particular matters*<sup>8</sup>'.

On this basis it is anticipated that the MSS will be significantly rewritten early in 2008 to remedy the identified shortcomings. Although the objective to simplify the document is known, the likely format is not. The structure proposed by the future work will directly influence how references to gaming can be integrated into the Local Planning Policy Framework (LPPF). However, given the variety of strategic issues that face the shire, it can be reasonably anticipated that the future MSS will retain

<sup>7</sup> Coomes Consulting Group (2007), '2007 Review of the Surf Coast Planning Scheme', p.5

<sup>8</sup> Coomes Consulting Group (2007), '2007 Review of the Surf Coast Planning Scheme', p.5

both a theme and location-based structure, although additional themes may be added and location-based matters condensed into broader concepts.

#### 8.4 Strategy Options

One of the tests for any local policy is that it needs to implement an objective or strategy in the MSS. Currently there are no explicit references to gaming in the MSS.

There are broad provisions in the MSS (and incorporated documents) that pertain to the maintenance and improvement of leisure and arts facilities as well as delineation between core retail areas and specialised tourism retailing for the community and tourist population. However, there are no specific themes that deal with activity centre hierarchy and/or economic development as major strategies. Moreover, the MSS ultimately applies a town-specific structure in the management of land use and development in the municipality which repeats a number of themes across a number of areas. The 2007 MSS Review identified this approach as problematic specifically because of repetition and conflicting messages within the existing document.

Although there is an upcoming opportunity to significantly rewrite the MSS, this *Gaming Policy* has been progressed on the basis of the existing Clause 21 in order to adequately integrate a gaming policy at Clause 22.

There are considered to be two options available. The first relies on the broad planning principles which relate to the provision and improvement of arts and leisure facilities at Clause 21.06 and tourism retailing at Clause 21.08. The second integrates within the broader guidelines of the strategic framework at Clause 21.04 and individual township strategies at Clauses 21.10 – 21.17.

Strategy Options:

1. Insert broad references to gaming at Clause 21.06, Landscape & Culture; and Clause 21.08 Tourism;

**OR**

2. Insert broad references to entertainment and recreation infrastructure at Clause 21.04, Strategic Framework; and explicit but location-specific references to gaming in township strategies at Clauses 21.10 – 21.17.

Option 1 relies on two very general themes where the concepts of economic development, retail and recreation facilities are repeated between the two Clauses. Neither Clause provides a platform through which gaming can be consistently and simply referred to and may actually result in repetition. Therefore what this option avoids in respect of repetition in the township strategies, it may create at Clauses 21.06 and 21.08.

Option 2 is an opportunity to address the repetition outlined above by discussing entertainment and recreation infrastructure in broad terms at the Strategic

Framework at Clause 21.04 and applying location specific criteria, where appropriate, at each township strategy. This option will result in some repetition throughout the township strategies but is the most straight forward approach given the existing limitations of the planning scheme.

On this basis Strategy Option 2 is pursued by this report. It is recommended:

- The proposed local policy will relate more to general principles about gaming machines, rather than dealing with specific locations;
- The MSS vision and objectives as outlined in the *Strategic Framework* at Clause 21.04, and more particularly the *Economy* and *Housing and Settlement* sections are consistent with the spatial framework established in the proposed local gaming policy; and
- Where required, suggested changes for the MSS are made.

## 8.5 Rewriting of the Municipal Strategic Statement

It is likely that the MSS will be comprehensively rewritten in future strategic work. This work may present a third strategic option for the integration of gaming policy into the LPPF, particularly if the broad themes at Clause 21.05 – 21.09 are altered.

If appropriately detailed themes such as '*Economic Development*' or '*Activity Centres*' are introduced, it may be preferable to integrate explicit references to gaming in either of these clauses and remove changes as per strategy option 2 above.

This approach has significant potential to reduce repetition throughout the MSS but would only be an appropriate option where it forms part of a comprehensive review that ensures broad themes do unnecessarily repeat or contradict strategies found elsewhere in the document.

## 8.6 Strategy Option 2 Recommendations

The following changes to the MSS are required to give effect to strategy option 2.

### Clause 21.04-2 The Economy

After the *Rural Residential Development* section include the following heading and key themes:

#### Entertainment and Recreation

- Entertainment and recreation facilities are an important aspect of both the desirability and liveability of the Surf Coast region
- All communities throughout the Shire should have a variety of entertainment and recreation opportunities available. This is subject to those entertainment opportunities, particularly gaming, being compatible with the socio-economic needs and characteristics of the local community

After *Key Objectives* include the following objective and reference:

- To provide for each community's individual and collective entertainment and recreation needs where this can be shown to foster a more sustainable community and the local economy.



- (Refer Clauses 21.10 – 21.17 Township Strategies)

### **Clauses 21.10 - 21.17 Township Strategies**

The changes required at each township strategy are outlined below. Strategies should be amended to reflect the following strategies, objectives and implementation measures.

#### **Torquay/Jan Juc**

The following broad themes about Torquay/Jan Juc should be incorporated into the introduction:

- Identified growth area
- Considered the 'capital and cultural hub' of the Shire
- Provides the greatest range of entertainment and recreation facilities

The following *Objectives, Strategies, Implementation Measures* and *Reference* should be included:

#### *Objectives*

- To ensure the location of electronic gaming machines results in a net community benefit, having regard to:
  - Areas of disadvantage and/or vulnerability to problem gambling;
  - The minimisation of opportunities for convenience gaming and the incidence of problem gambling;
  - The availability of non-gaming entertainment and recreation activities within the catchment area, particularly for the permanent population; and
  - The amenity of the surrounding area, including the overall character of the township.

#### *Strategies*

- Where gaming machines are proposed, require the preparation of a comprehensive environmental, economic and social impact assessment demonstrating quantifiable net community benefit;
- Discouraging or, where possible, prohibiting gaming venues from being located in areas of greatest community activity.

#### *References*

- Coomes Consulting Group, *Surf Coast Shire Gaming Policy*, 2007

#### **Winchelsea**

The following themes should be included into the *Introduction* at Clause 21.14:

- Winchelsea is an identified growth area in which future development in the hinterland shall be directed.
- While not presently a township that offers a wide variety of entertainment and recreation infrastructure, the anticipated growth will require additional services and facilities to support this.

The following *Objectives*, *Strategies* and *Reference* should be included:

*Objectives*

- To discourage the location of electronic gaming machines in Winchelsea until there is a reduction in levels of relative socio-economic disadvantage, sufficient population growth, and commensurate variety of local non-gaming entertainment and recreation facilities available to support this growth.

*Strategies*

- Applying local gaming policy 22.XX to ensure net community benefit is gained from the establishment or relocation of electronic gaming machines
- Prohibit gaming venues in shopping complexes and strip shopping centres identified in the schedules to Clause 52.28-3 and 52.28-4, respectively

*References*

- Coomes Consulting Group, *Surf Coast Shire Gaming Policy Framework*, 2007

**Anglesea, Lorne, Aireys Inlet, Moriac, Bellbrae and Deans Marsh**

The introduction to each strategy should build on the existing concept of the protection of the coastal character of each settlement to include the appropriate location gaming venues in and around town centres.

The following *Objectives*, *Strategies*, *Implementation Measures* and *Reference* should be included:

*Objectives*

- To discourage the location of [additional] gaming machines in [name of township] is until there is sufficient population growth and commensurate variety of local non-gaming entertainment and recreation facilities available to support this.

*Implementation*

- Applying local gaming policy 22.XX to ensure net community benefit is gained from the establishment or relocation of electronic gaming machines
- Prohibit gaming venues in shopping complexes and strip shopping centres identified in the schedules to Clause 52.28-3 and 52.28-4, respectively

*References*

- Coomes Consulting Group, *Surf Coast Shire Gaming Policy Framework*, 2007

## 8.7 Draft Policy

This draft local planning policy is based on the principles set out above.

### **Policy 22.xx Gaming**

This policy applies to all applications which require a permit to install or use a gaming machine, or use land for the purpose of gaming in the Surf Coast Shire.

#### **22.xx-1 Policy Basis**

Clause 52.28 of the Surf Coast Planning Scheme requires a planning permit be granted to use or install gaming machines. This policy will guide decision making by implementing the findings of the *Surf Coast Shire Gaming Policy Framework*.

Research has concluded that there are links between disadvantage, problem gambling and proximity to gaming venues. The *Surf Coast Shire Gaming Policy Framework* suggests that while gaming may be accessible to the community as a form of entertainment, it is desirable that a pre-determined decision is required to gamble by limiting convenient access to gaming venues.

The Shire is also seeking to protect its disadvantaged residents, by accounting for the socio-economic characteristics of the municipality in the location of gaming machines. Relatively disadvantaged areas, such as Winchelsea, are most vulnerable to the potential harmful affects of gaming.

The policy implements the objectives and strategies of the Municipal Strategic Statement. These include providing for the Shire's entertainment recreation needs, while ensuring gaming proposals are compatible with the socio-economic characteristics of the community and located in appropriate townships where they will achieve a net community benefit.

#### **22.xx-2 Objectives**

- To discourage gaming machines in disadvantaged areas.
- To avoid the risk of exacerbating problem gambling
- To minimise the likelihood of pedestrians passing by venues with gaming machines in the course of their usual business.
- To ensure that gaming machines are located where the community has a choice of non-gaming entertainment and recreation activities within the venue and in the local area.
- To protect the operations and amenity of existing uses surrounding gaming venues.
- To protect the township character, tourism assets and amenity of the shire.

#### **22.xx-3 Policy**

It is policy to have regard to the SEIFA Index of Relative Disadvantage and Policy Map 1 - Strategic Location Framework in determining appropriate locations for gaming machines in the Surf Coast Shire.

It is policy to locate gaming machines in accordance with the following two-step location criteria.

*Step 1* - 'Primary location criteria' broadly set out appropriate and inappropriate areas for gaming machines.

*Step 2* - 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*

- It is preferred that gaming machines are located in towns:
  - that function as an Urban Growth Centre, Rural Service Centre, or Coastal Tourist Township, as shown on Policy Map 1; and
  - are experiencing or expected to experience population growth, as shown in Policy Map 1; and
  - where the gaming machine densities (based on the permanent population) are lower than the regional Victorian average; and
  - where the levels of disadvantage are lower than the Victorian average as set out in the SEIFA Index of Relative Disadvantage; and
  - which offer a reasonable choice of alternative non-gambling activities comprising community centres, neighbourhood houses, clubs, hotels, cinemas or restaurants within the same town, operating during the times that the proposed gaming machines will operate.
- Gaming machines may be located outside established townships where they are in a sports or recreation club with a land holding of more than 2 hectares.

#### *Detailed location criteria:*

- Gaming machines should be located towards the periphery of town centres and tourism precincts, outside of the main transport, shopping, community and civic functions of the centre/precinct or within easy walking distance of the edge of the centre/precinct.
- **Gaming machines should be located in venues which are a destination in their own right. This is defined as locations where gaming venues will not be integrated with or adjacent to shops, major transport interchanges, foreshore activity areas and key community facilities.**  
**AND/OR**
- **Gaming machines should not be located in areas shown in *Surf Coast Shire Maps of Discouraged Gaming Areas Incorporated Document* [see discussion below in Section 8.8].**

#### *Venue Characteristics*

It is policy to ensure that gaming machines are located 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;
- Promote responsible gaming practices and
- Do not allow for 24 hour-a-day operation.

It is policy to ensure that the operations of gaming venues and associated uses do not detrimentally affect the amenity of the surrounding area, township character, or tourist assets through their:

- Appearance;
- Operating hours;
- Management of patrons; or
- Generation of noise and disturbance.

#### **22.xx-4 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.
- 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 the local area.
- 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 towns. An explanation as to why the EGMs are being transferred is to be provided.
- The relative socio-economic disadvantage of the township and the broader catchment of the venue in comparison to the Victorian average in the SEIFA index of Relative Disadvantage.
- 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. Details of the design and layout of the premises including all proposed signage and evidence of compliance with the relevant gaming regulations for premises layout and design.
- Details of what gaming and non-gaming entertainment and recreation venues and social infrastructure exist within 5km of the venue.
- 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-5 Decision Guidelines**

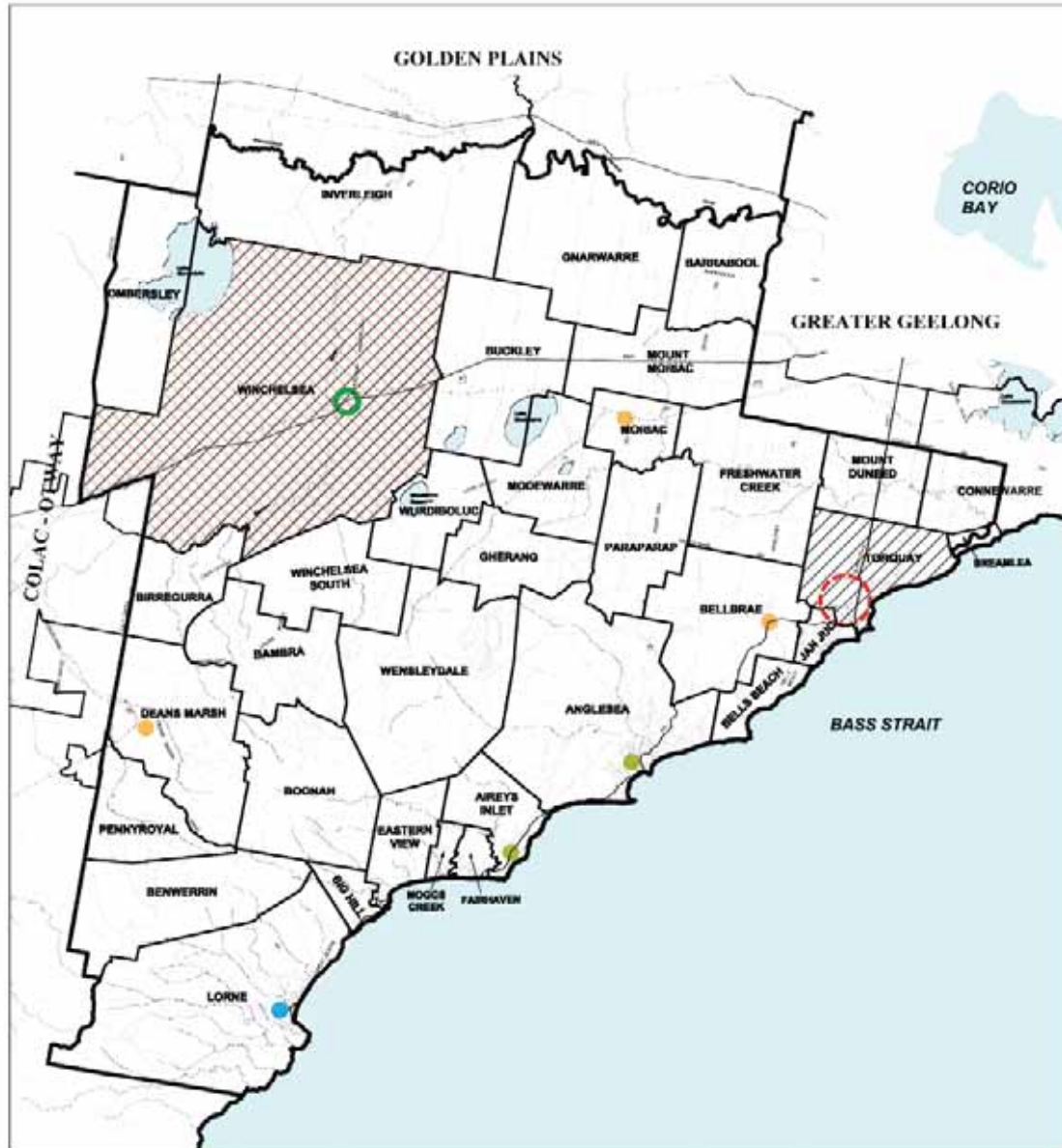
It is policy that the responsible authority considers as appropriate:

- The affect of the proposal on EGM densities in the locality in comparison to the regional Victorian average.
- The net community benefit to be derived from the application.
- Whether approval is likely to increase the socio-economic disadvantage of the local community.
- Whether the location of the gaming machines or gaming premises will facilitate or discourage convenience gaming.
- Whether permanent residents will have a choice between entertainment and recreation venues with and without gambling in the local area.
- The impact of the proposal on the amenity of the area and surrounding land uses, including the character of the township.

#### **22.xx-6 References**

- Coomes Consulting Group, *Surf Coast Shire Gaming Policy*, 2007

Figure 6: Policy Map 1 Strategic Locational Framework Plan



Legend

-  Urban Growth Centre
-  Rural Service Centre
-  Coastal Tourist Township
-  Coastal Township
-  Rural Township
-  Growth Areas
-  Areas of Socio-economic Disadvantage

Surf Coast Shire

Drawing No 132167 Date October

Coomes Consulting Group Pty Ltd - A subsidiary of Downer EDI  
Melbourne Shepparton Bendigo Albury Geelong

Engineering Surveying Planning Urban Design Landscape Architecture  
Sustainability and Environment Agribusiness Project Management Strategic Consulting

## 8.8 Prohibited and discouraged areas in and around shopping centres

Under Clause 52.28-4 of the Surf Coast Shire 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 covered by the scheme, although particular sites are listed.

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, an audit of Surf Coast Shire's business areas was undertaken to determine which qualify as a strip shopping centres. This involved a desktop assessment of existing Clause 52.28-4 provisions and site audits of a number of additional sites. The audit 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 conveniently accessible 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 impulsive gaming. A table and maps showing the results of this audit is set out 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.
- Update the schedule to Clause 52.28-3 to include additional shopping complexes identified in the audit.

A further option may be to:

- Include maps showing areas where gaming is discouraged as an incorporated document in the Surf Coast Shire 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 relevant section be removed from the draft policy above and replaced with:

*Gaming machines should be located in venues which are a destination in their own right. This is defined as locations where gaming venues will not be integrated with or adjacent to shops, major transport interchanges, foreshore activity areas and key community facilities.*



---

## 9 Planning Tools

### 9.1 Application process for planning permits related to Electronic Gaming Machines (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:

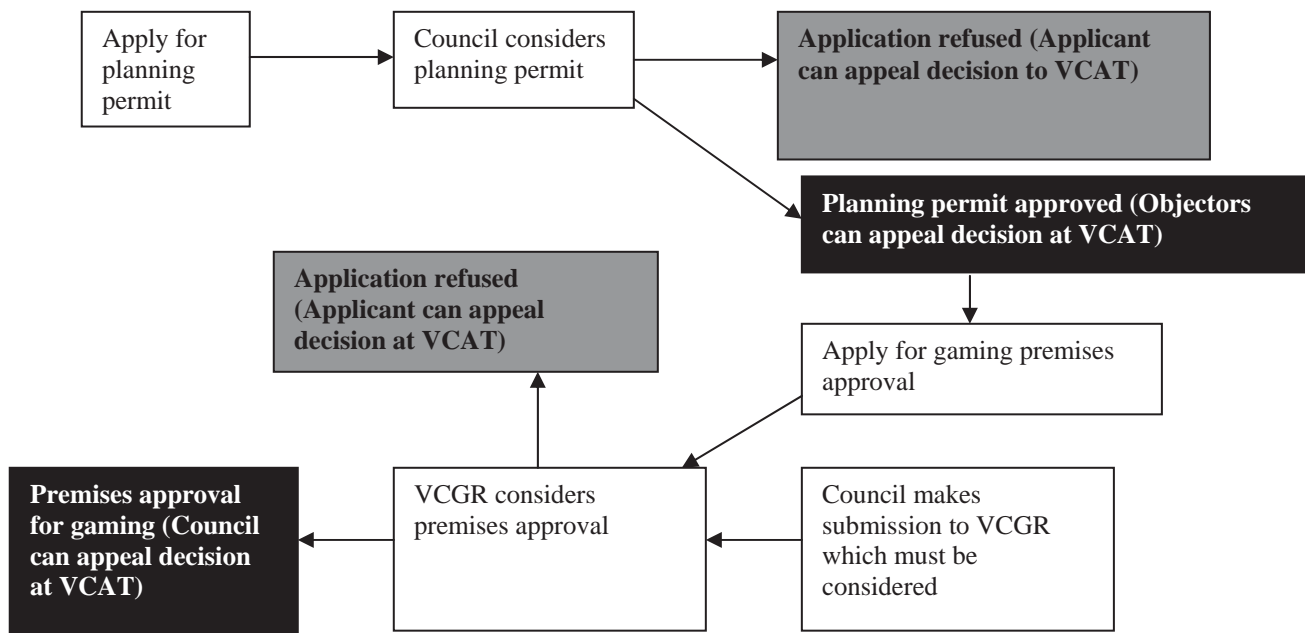
- Council may consider a broad range of land use, environmental, social and economic factors as well as public objections when determining a planning application for gaming. In comparison the matters that must be considered by the VCGR have a narrower focus (see Table 10 below).
- This is more consistent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

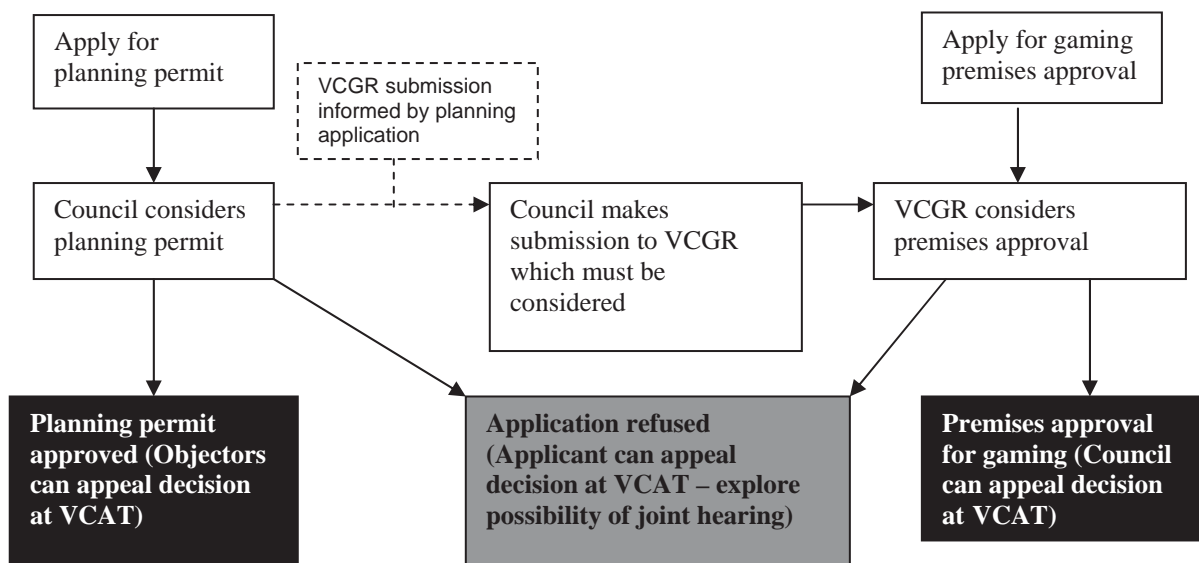
- Minimise the time taken to consider the proposal.
- Allow opportunities for more collaborative approaches between the applicant and Council to manage issues that may arise in both assessment processes.
- In the event of a refusal from both Council and the VCGR, possibly open the opportunity for a joint 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:



Process Diagram 2:



**Table 10: Comparison of potentially relevant considerations for planning and gaming approval**

Planning and Environment Act Section 60	Gambling Regulation Act 2003 Section 3.3.7
<p>Council must consider:</p> <ul style="list-style-type: none"> <li>– the planning scheme</li> <li>– the objectives of planning in Victoria;</li> <li>– all objections and other submissions</li> <li>– any comments of a referral authority</li> <li>– any significant effects of the proposal on the environment or the environment on the proposal.</li> </ul>	<p>VCGR must not approve a premises as suitable for gaming unless it is satisfied that:</p> <ul style="list-style-type: none"> <li>– the applicant has authority to make the application in respect of the premises</li> <li>– the premises will be suitable for the management and operation of gaming machines</li> <li>– 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</li> </ul>
<p>Council may consider:</p> <ul style="list-style-type: none"> <li>– any significant social and economic effects</li> <li>– any relevant State environment protection policy</li> <li>– any other adopted strategic plan, policy statement, code or guideline</li> <li>– any adopted, but yet to be approved amendment to the planning scheme</li> <li>– any agreement made pursuant to section 173 affecting the land the subject of the application</li> <li>– any other relevant matter</li> </ul>	<p>The VCGR must consider:</p> <ul style="list-style-type: none"> <li>– whether the size, layout and facilities of the premises will be suitable.</li> <li>– 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.</li> </ul>

### 9.1.2 Referral 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 8.7 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 some 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	<ul style="list-style-type: none"> <li>– Location of the anticipated catchment area and the basis for this projected catchment</li> <li>– Profile of patrons in the catchment area including a range of demographic and socio-economic characteristics (such as SEIFA)</li> <li>– Comparative analysis of socio-economic profile</li> <li>– Projected population growth and characteristics</li> </ul>
Location assessment	<ul style="list-style-type: none"> <li>– Characteristics of the proposed location of the EGMs such as nearby land uses and movement patterns, including transport</li> <li>– Other entertainment/recreation uses, opportunities for social engagement and community services within the catchment area</li> </ul>
EGM impacts	<ul style="list-style-type: none"> <li>– Anticipated EGM expenditure and what proportion will be diverted from existing EGM venues</li> <li>– Proportion of EGM expenditure to remain in the local community</li> </ul>
Economic impacts	<ul style="list-style-type: none"> <li>– Employment generated by gaming use and other uses associated with the proposal including details about the types of jobs created</li> <li>– Value of new building and infrastructure provision associated with establishment of the proposal</li> <li>– Anticipated shift in expenditure from local business</li> <li>– Details of any proposed community contributions</li> <li>– Any other economic benefits or costs associated with the proposal</li> </ul>
Social impacts	<ul style="list-style-type: none"> <li>– Details of proposed funding, sponsorship or other contributions to local services and facilities and how these benefits will be distributed and secured.</li> <li>– Details of and demand for problem gambling support services including likely changes if application is approved</li> <li>– Any other social benefits or costs associated with the proposal</li> </ul>
Analysis and mitigation	<ul style="list-style-type: none"> <li>– Key social and economic impacts and possible measures to mitigate any negative impacts</li> </ul>

### 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 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 is 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 –

- a) an alternative means of accessing that facility which does not require passing through the gaming machine area; or
- b) 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.

1. Australian Bureau of Statistics (2001, 2006). *Census of Population and Housing*, [www.abs.gov.au](http://www.abs.gov.au)
2. Australian Institute for Gambling Research (1996). *Study 2. An Examination of the Socio-economic Effects of Gambling on Individuals, Families and the Community Including Research into the Costs of Problem Gambling in New South Wales*. A report to the Casino Community Benefit Fund, NSW Government
3. Australian Institute for Gambling Research (UWS Macarthur) (2000). *The Impact of the Expansion of Gaming on the Tourism, Entertainment and Leisure Industries*. Published by the Victorian Casino and Gaming Authority.
4. Australian Institute for Primary Care, La Trobe University (Livingstone, C.) (2006) *The Changing Electronic Gaming Machine (EGM) Industry and Technology*
5. Australian Medical Association (1999) *Submission to the Productivity Commission's Inquiry into Australia's Gambling Industries*
6. Australian National University (ANU) Centre for Gambling Research (2004). *Gaming Machine Accessibility and Use in Suburban Canberra: A Detailed Analysis of the Tuggeranong Valley*, commissioned by the ACT Gambling and Racing Commission
7. Bethany Community Support (2007), *Needs Analysis Gamblers Help Service*
8. Bethany Community Support (2007) *'The Emotional Health Needs of Males Living in Surf Coast Shire: Analysis and Service Model'*
9. Brown S and Coventry L (1997). *Queen of Hearts. The Needs of Women with Gambling Problems*. Melbourne, Financial and Consumer Rights Council Inc.
10. Consumer Affairs Victoria (2004a). *Discussion Paper: What do we mean by 'vulnerable' and 'disadvantaged' consumers?*, [www.consumer.vic.gov.au](http://www.consumer.vic.gov.au)
11. Consumer Affairs Victoria, (2004b). *Liquor Licensing: A guide to liquor licensing in Victoria*, <http://www.consumer.vic.gov.au>
12. Cultural Partners Australia Consortium (2000). *The Impact of Gaming on Specific Cultural Groups*, Victorian Commission for Gambling Regulation [www.vcgr.vic.gov.au](http://www.vcgr.vic.gov.au)
13. Department of Infrastructure (2002). *Melbourne 2030: Planning for Sustainable Growth*, Melbourne
14. Department of Justice, Office of Gaming and Racing (2005). *Regional Electronic Gaming Machine Caps Review Panel: Final Report*, Melbourne.
15. Department of Justice (2006). *Taking Action on Problem Gambling: a strategy for combating problem gambling in Victoria*, Melbourne
16. Department of Victorian Communities (2006). *Indicators of Community Strength at the Local Government Area Level 2006*, Melbourne
17. Department of Victorian Communities (2006) *Annual Report 2005-06*



18. Doughney, J & Kelleher, T. (1999). *The Impact of Poker Machine Gambling on Low Income Municipalities – A Critical Survey of Key Issues*, Workplace Studies Centre, Victoria University, Melbourne.
19. Id Consulting (2007), *Surf Coast Shire Population Forecasts*
20. Id Consulting (2007), *Surf Coast Shire Community Profile*
21. Kirby, P. (2006). *The Review of Electronic Gaming Machine, Club Keno and Wagering Licenses, and Funding Arrangements for the Licensing Industry Post-2012*, Gambling Licenses Review, Office of Gaming and Racing, Melbourne.
22. KPMG Consulting, (1999). *Report of the 1999 Longitudinal Community Impact Study*, Victorian Casino and Gaming Authority
23. Legge K (1996). "A Jackpot society", in Cathcart M and Darien-Smith K (eds) *Place Your Bets: Gambling in Victoria*. Melbourne, The Australian Centre, University of Melbourne.
24. Local Government Working Group on Gambling (2006). *Submission to the Licensing Arrangements*, Melbourne.
25. Market Solutions (1999). *Hotel and Club Industry Gaming Impact Study: Final Report December 1999*, Victorian Commission for Gambling Regulation, [www.vcgr.vic.gov.au](http://www.vcgr.vic.gov.au)
26. New Focus Research (2005). *Experiences of Problem Gamblers, their Loved Ones and Service Providers*, Department of Justice, Melbourne.
27. Productivity Commission (1999) *Australia's Gambling Industries*, Report No. 10, Canberra.
28. SA Centre for Economic Studies (2005). *Community Impact of Electronic Gaming Machine Gambling*, Victorian Gambling Research Panel
29. Surf Coast Shire, *Health and Wellbeing Plan 2006-2009*
30. Surf Coast Shire (2006), *Tourism Strategic Plan*
31. Surf Coast Shire (2006) *Housing Policy Project*
32. University of Melbourne (1998). *Analysis of Clients Presenting to Problem Gambling Counselling Services July 1997—June 1998: Client and Service Analysis Report No. 4*, Prepared for Department of Human Services, Melbourne.
33. Victorian Commission for Gambling Regulation (1997). *Impact of Electronic Gaming Machines on Small Rural Communities*, [www.vcgr.vic.gov.au](http://www.vcgr.vic.gov.au)
34. Victorian Commission for Gambling Regulation (1997). *Impact of Electronic Gaming Machines on Small Rural Communities*, [www.vcgr.vic.gov.au](http://www.vcgr.vic.gov.au)
35. Victorian Commission for Gambling Regulation (2005). *Impact of Gaming Venues on Inner City Municipalities*, [www.vcgr.vic.gov.au](http://www.vcgr.vic.gov.au)
36. Victorian Commission for Gambling Regulation (1997). *Impact of Electronic Gaming Machines in Small Rural Communities*, [www.vcgr.vic.gov.au](http://www.vcgr.vic.gov.au)
37. Vinson, T. (2004). *Community Adversity and Resilience: the distribution of social disadvantage in Victoria and New South Wales and the mediating role of social cohesion*, Jesuit Social Services, Richmond
38. Volberg RA and Abbott MW (1994). *Lifetime prevalence estimates of pathological gambling in New Zealand*. Int J Epidemiol 23: 976-983.

### Websites

1. Department of Justice, Office of Gambling and Racing,  
[www.justice.vic.gov.au](http://www.justice.vic.gov.au)
2. Victorian Commission for Gambling Regulation, [www.vcgr.gov.au](http://www.vcgr.gov.au)
3. Victorian Legislation and Parliamentary Documents,  
[www.dms.dpc.vic.gov.au](http://www.dms.dpc.vic.gov.au)

**Attachments**  
**Gaming Policy Framework – Surf Coast Shire**

---

## 11 Attachment 1 - Methodology and Consultation Results

### 11.1 Literature Review

The aim of this task was to gain a comprehensive understanding of the legislative and policy context in which the gaming policy for the Surf Coast Shire will sit.

A literature review was conducted of the following:

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

The outcomes of the literature review have been used to develop the principles and policy surrounding the location of gaming venues in the south eastern region. The literature review has revealed the evidence based for this document.

### 11.2 Socio-Economic Analysis

The aim of the Socio-Economic Analysis was to gather relevant social research and data that could inform gaming policy.

Socio-Economic Analysis

- Desktop analysis
- Consultations with venue owners and operators, community organisations and Surf Coast Shire Planners

The outcomes of these tasks were used to inform the Surf Coast Shire gaming principles, local planning policy framework and EGM application process

### 11.3 Consultations

As the City of Greater Geelong and Surf Coast Shire are developing a gaming policy concurrently, joint consultations were held. In order to ensure that relevant industry and community members were involved in the development of the Surf Coast Shire Gaming Policy the following approaches to consultation were used:

- A joint focus group with owners and operators of venues within the City of Greater Geelong and Surf Coast Shire that accommodate electronic gaming machines.
- A joint focus group with representatives of relevant health and community sector organisations within City of Greater Geelong and Surf Coast Shire
- Meetings with Surf Coast Shire Planners

This section outlines the approach and outcome of each consultation.

#### **Focus groups with representatives of relevant health and community sector organisations**

A list of invitees was developed by City of Greater Geelong and Surf Coast Shire and invitations were sent to 55 representatives from health and community sector

organisations inviting them to attend a focus group to inform the development of the City of Greater Geelong and Surf Coast Gaming Policies.

10 participants attended a 1 ½ hour focus group at the City of Greater Geelong Town Hall on the 11<sup>th</sup> October 2007.

*The purpose of the focus groups was to:*

- Provide participants with information about the project aims, timelines and anticipated outcomes
- Obtain information about current research and data on gaming, including the social and economic profiles of problem gamblers
- Obtain information about local data sources and local issues
- Identify factors that contribute to accessing gaming facilities
- Discuss the social, economic and environmental factors that might be considered in the assessment of planning permit applications for EGMs

Participants were provided with a table that summarised available socio-economic data for the suburbs of City of Greater Geelong and Surf Coast Shire.

*Outcomes of the meeting included:*

- Additional census data to include in understanding socio-economic conditions at City of Greater Geelong and Surf Coast Shire, particularly around housing and housing costs
- No typical profile of a problem gambler as they come from all sectors of society
- The design, hours of operation, type of gaming venue and location were all seen as factors that affect gambling behaviour

#### **Focus group with owners and operators of venues that accommodate electronic gaming machines**

A list of invitees was developed by City of Greater Geelong and Surf Coast Shire and invitations were sent to 32 representatives from gaming venues within Greater Geelong and Surf Coast inviting them to attend a focus group to inform the development of the City of Greater Geelong and Surf Coast Gaming Policies.

22 participants attended a one and a half hour focus group at the Mercure Hotel on the 11<sup>th</sup> October 2007. Attendees split into small groups to discuss venue operations and what aspects of a venue they would consider appropriate to be requested through the planning application process.

*The purpose of the focus group was to:*

- Provide participants with information about the project aims, timelines and anticipated outcomes.
- Obtain information about the type of information that could likely be provided by a venue applying for a planning permit with Council.
- Discuss the location characteristics of gaming venues, including the spatial conditions that support the viability of gaming venues and 'drivers' for the location of new gaming machines.

- Discuss the social, economic and environmental factors that might be considered in the assessment of planning permit applications for EGMs.

*Outcomes of the meeting included:*

- The provided table will be modified and will be used as a 'check-list' to show the community benefit of future EGM applications to Council
- Information requested from council should not duplicate the information provided within the Community Benefit Statements as this is a time consuming and expensive process for many venue owners.
- The potential for future growth was not considered relevant
- Hotels often have difficulty in providing a lot of data that that is requested as they do not keep data such as postcode data on where patrons live, or the amount of time spent in gaming rooms
- Added columns to the table should include:
  - o The various non cash supports and facilities provided by venues
  - o The proportion of people that use the venue but do not use the gaming room
  - o Training, assistance and extra employment opportunities that are provided by venues
- Locational characteristics. Responses to what makes a gaming venue viable with regard to location included:
  - o It is beneficial if venues are close to shops
  - o Being close to residential areas creates various problems in regards to parking and congestion
  - o A facility that offers a range of social and entertainment services, of which gaming is one element.
  - o Parking, lighting, signage and patron safety are important.

*Social, Economic and Environmental Considerations for assessing gaming applications*

- o Consider looking at hotels and clubs separately when assessing applications as they perform a different role and serve a different market
- o The fluctuation of population within coastal tourist towns and the growth in population due to major events held in Geelong should be considered, particularly in regard to EGM densities
- o The VCGR and planning permit application process should occur together as this would ensure that there was not a duplication in the information requested
- o The wide social role that venues provide to the community

### **Consultation with Surf Coast Shire Planners**

Consultation was held with representatives of the statutory and strategic planning departments. Three Council officers attended the meeting on 19th October 2007.

*The purpose of this consultation was:*

- Report back on industry, venue owners, community and health sector consultations.
- Preliminary discussion of generic principles for gaming policy and their application to Surf Coast Shire

*Outcomes of the meeting included:*

- Clarification of approach to Surf Coast Shire Spatial Audit.
- Revision of Location Principles for Gaming to include a more local approach.

---

12                      **Attachment 2 - Proposed Ministerial Direction on Community Purpose**

**Ministerial order pursuant to section 3.6.9(3) of the *Gambling Regulation Act 2003***

I, Tony Robinson MP, Minister for Gaming, pursuant to section 3.6.9(3) of the *Gambling Regulation Act 2003*, make the following determination of the kind of activities or purposes that constitute community purposes.

A venue operator may claim up to:

- 100 per cent of revenue applied to a Class A purpose or activity
- for revenue applied to Class B purposes or activities, an amount equal to the proportion of non-gaming revenue to the club's total revenue<sup>1</sup>
- 100 per cent of revenue applied to a Class C purpose or activity.

**Class A purposes and activities: Direct community benefits**

- (a) Donations, gifts and sponsorships, including cash, goods and services, to another person resident in Victoria for the purposes or activities set out below but excluding purposes or activities conducted for profit and excluding a gift or donation of alcohol<sup>2</sup>:
  - (i) any educational purpose, but excluding education provided for the benefit of the members of a professional or business association
  - (ii) the provision of health services or care
  - (iii) services for the prevention and treatment of problem gambling and drug and alcohol addictions
  - (iv) housing assistance for disadvantaged persons, including the provision of housing support and assistance to those experiencing homelessness or at risk of becoming homeless
  - (v) the relief of poverty
  - (vi) the provision of services and assistance for the aged
  - (vii) the provision of services and assistance for young people<sup>3</sup>
  - (viii) the protection and preservation of the environment but excluding conservation or rehabilitation activities conducted on private land
  - (ix) the provision of assistance to relieve distress caused by natural or other disasters
  - (x) the provision of advice, support and services to ex-service personnel, their carers and families, including payments to the Victorian Veterans Fund or a patriotic fund under the *Veterans Act 2005* or to any fund for that purpose established by the Returned and Services League Australia (Victorian Branch)



- (xi) any other philanthropic or benevolent purpose including the promotion of art, culture, cultural diversity and community harmony, or charity including the benefiting of organisations endorsed by the Australian Taxation Office as ‘Income Tax Exempt Charities’
- (xii) any sporting or recreational purpose, including the benefiting of any sporting or recreational club or association, but excluding any club that holds a venue operator’s licence.
- (b) The cost of providing and maintaining sporting facilities for use by club members<sup>4</sup>.
- (c) The cost of any subsidy provided for the provision of goods or services but excluding the provision of alcohol<sup>5</sup>.
- (d) Voluntary services provided by members and staff of the club to the community in fulfilment of those purposes or activities (i) to (xii) in paragraph (a) but excluding those voluntary services provided by club members to the club itself or to another club that holds a venue operator’s licence. The maximum amount that can be claimed is \$20 per hour per volunteer<sup>6</sup>.
- (e) Where the club that holds the venue operator’s licence is a sub-branch of the Returned and Services League Australia (Victorian Branch), the provision of advice, support and services provided by that club to ex-service personnel, their carers and families, including payments to the Victorian Veterans Fund or a patriotic fund under the *Veterans Act 2005* or to any fund for that purpose established by the Returned and Services League Australia (Victorian Branch).

#### **Class B purposes and activities: Indirect community benefits**

- (a) Capital expenditure.
- (b) Financing costs (including principal and interest)<sup>7</sup>.
- (c) Retained earnings accumulated during the year for which the community benefit is claimed<sup>8</sup>.
- (d) The provision of buildings, plant or equipment but excluding any building, plant and equipment with a value of less than \$10,000 per item and excluding the provision of gaming equipment or the gaming machine area of an approved venue<sup>9</sup>.
- (e) Operating costs<sup>10</sup>.

#### **Class C purposes and activities: miscellaneous**

- (a) The provision of responsible gambling measures and activities but excluding those required by law<sup>11</sup>.
- (b) Reimbursement of expenses reasonably incurred by volunteers.
- (c) The preparation and audit of a community benefit statement required under section 3.6.9 (1) of the Gambling Regulation Act 2003 to a maximum of \$3,000.

---

**13 Attachment 3 - Clause 52.28**

**52.28 GAMING**

18/10/2006  
VC39

**52.28-1 Purpose**

18/10/2006  
VC39

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**

18/10/2006  
VC39

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**

18/10/2006  
VC39

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**

18/10/2006  
VC39

Installation or use of a gaming machine is prohibited in a strip shopping centre if:

- the strip 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 abut 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**

18/10/2006  
VC39

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.

**52.28-6**

18/10/2006  
VC39

**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.

---

## 14 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)

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)

### **Gender and Gambling**

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).

Isolated women are particularly attracted to EGMs as a form of entertainment as they offer social contact in a non-confrontational environment where women have reported feeling safe (New Focus 2005). EGMs provide a unique social environment that allows for privacy and non-participation in organised activity.

### **Ethnicity and Gambling**

Approximately one quarter (24.4%) of problem gamblers were born overseas from a range of countries, reflecting the ABS data for the population of Victoria at the same time (1996 data) – 27% (University of Melbourne 1999). Over half of those born overseas were born in Europe (61.1%) and 85.3% of problem gamblers in this study spoke English as their main language.

A study conducted in 2000 for the VCGR investigated the impact of gaming on four specific cultural groups in Victoria (Arabic, Chinese, Greek and Vietnamese speaking cultural groups). The study found that rates of participation in gaming was lower in the four cultural groups than the general community but that those who did participate were more likely to spend more on gaming (with the exception of the Arabic speaking group) and were more likely to have a problem with gambling. (Cultural Partners 2000)

In addition, the preferred modes of gaming differed between the various cultural groups. The percentage of respondents who use the EGMs at the casino is higher for the Greek and Chinese cultural groups, but much lower for Vietnamese and Arabic groups. Conversely, respondents from this survey were much less likely to gamble in club venues. (Cultural Partners 2000)

#### **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.

Consumer Affairs Victoria 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. Vulnerable or disadvantaged consumers can be influenced by a lack of information but also by accessibility and a range of socio-economic attributes including low income, education, levels of English spoken and isolation (CAV 2004a)

Therefore, as with other consumer products, a variety of entertainment options should be available and gaming should not be offered as the sole outlet for entertainment and recreation in an area. 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.

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.

### **Venue Type**

Hotel gaming machines earn approximately twice the amount of club machines in Victoria (revenue per machine) (Livingstone 2006; Market Solutions 1999) This, plus the general perception that clubs are more likely to produce community benefit as a result of their nature as sporting and charity-based clubs; has lead to the ministerial direction on a split between hotel and club venues at 50% for each.

There is minimal evidence of the reason people spend more on hotel than club machines; however, the Livingstone report (2006) attempts to assess the reasons for this anomaly. It suggests that the club environment may deter heavy gamblers because of their relatively small numbers of machines and a lack of anonymity, and due to the clubs' role as a social, sporting or charity club. Large hotel venues may be more likely to have 'high-risk' characteristics such as, "higher numbers of EGMs, high activity levels, a substantial degree of anonymity, gambling as a major or primary business focus, more limited social purposes and extended operating hours". (Livingstone 2006) Therefore, it is likely that size of a venue plays as much a part as type of venue

Whilst this research is not substantial, there is a preference amongst many communities and local governments to favour the installation of gaming machines in clubs rather than hotels based on expenditure rates.



Club venues with gaming facilities are more reliant on gaming revenue than hotel venues with gaming facilities (Market Solutions 1999; ABS 2005)

### **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 an 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). Using EGM density as an indicator of the potential impact may conflict with the destination gambling approach. 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)

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 arrangements<sup>9</sup>.

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.

---

<sup>9</sup> 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*.  
© Coomes Consulting Group

15 Attachment 5 - Surf Coast Shire Policy Review

Policy name	Structure	Structure/Relevant sections
<b>Surf Coast Shire Planning Scheme</b>		
<b>2007 Municipal Strategic Statement Review</b>	<p>The MSS was recently reviewed in Coomes Consulting Group, <i>2007 Review of the Surf Coast Planning Scheme, 2007</i>.</p> <p>This review took into consideration the previous reviews:</p> <ul style="list-style-type: none"> <li>- Carried out by Council in 2003</li> </ul> <p>Carried out for State Government, <i>Surf Coast Planning Scheme , Three Year MSS Review Report, Dec 2002</i>, Keaney Planning and Research Pty Ltd</p>	<p>Broadly this review concluded:</p> <ul style="list-style-type: none"> <li>- The Surf Coast Shire Planning Scheme is overtly difficult to use and understand principally because of its length and complexity, some of which results in duplication and inconsistency;</li> <li>- These limitations are a result of the use of both a theme-based and place-based framework in the MSS;</li> <li>- The complexities in the MSS confuses plan-users (including applicants) and leaving the document at risk of inconsistent interpretation;</li> <li>- Council has undertaken a vast array of strategic planning work that influences the development of the strategy, the challenge is in the useful integration of that work before it is dated; and</li> <li>- The MSS be fully rewritten in lines with VPP format taking into account the need to reduce the duplication and complexity.</li> </ul>
<b>Clause 21 Municipal Strategic Statement (MSS)</b>	Relevant clauses are summarised below:	
<b>Clause 21.01 Introduction</b>	This clause gives an overview of the municipality, its regional context and the structure of the MSS	<ul style="list-style-type: none"> <li>- The Shire consists of 1560km<sup>2</sup> with 55km of coastline</li> <li>- Is strongly influenced by physical and topographical features, impacting on urban development and land use management</li> <li>- Is part of the Geelong Region and inextricably linked by a variety of infrastructure</li> <li>- The Great Ocean Road is a tourist attraction of international significance, as are the various other attractions such as the forested hinterland that form</li> </ul>

Policy name	Structure	Structure/Relevant sections
		<p>the Otway Ranges</p> <ul style="list-style-type: none"> <li>- The MSS contains eighteen clauses divided into three parts; Clauses 21.01 – 21.04 dealing with physical characteristics of the Shire and an overview of the strategic context; Clauses 21.05 – 21.09 contain theme based strategies; and Clauses 21.10 – 21.17 provides comprehensive strategies for each of the Shire’s townships.</li> </ul>
<b>Clause 21.02 Council Plan</b>	<p>Mission statements include:</p> <ul style="list-style-type: none"> <li>- Developing and promoting Surf Coast Shire as a place of well being</li> </ul>	<ul style="list-style-type: none"> <li>- Strategic planning is outlined to be <i>‘well planned to accommodate growth and development while maintaining our environmental values’</i></li> </ul>
<b>Clause 21.03 Surf Coast 2020 Vision</b>	<p>The Vision includes elements about:</p> <ul style="list-style-type: none"> <li>- Protecting the Shire’s environmental assets</li> <li>- Controlling and containing development</li> <li>- Population increase will be in the hinterland not coastal areas</li> </ul>	<p>Amongst the issue-specific goals;</p> <ul style="list-style-type: none"> <li>- A balance is recognised about <b>retaining the unique character of each town</b></li> <li>- Have the <b>highest quality lifestyles and viable economic base</b></li> </ul>
<b>Clause 21.04 Strategic Framework</b>	<p>The strategic framework aims to manage the diverse environmental values of the Shire in a sustainable manner</p>	<p>The key objectives include:</p> <ul style="list-style-type: none"> <li>- To manage population growth in an environmentally sustainable manner and make effective use of the physical and social infrastructure by identifying <b>Torquay/Jan Juc and Winchelsea as growth nodes</b></li> <li>- To promote the <b>role of the Torquay Town Centre as the commercial and cultural heart of the Shire</b></li> <li>- To <b>protect the coastal township character of towns...by preventing urban expansion beyond existing town boundaries</b></li> </ul>
<b>Clause 21.08 Tourism Strategy</b>	<p>The Shire includes one of the most high profile coastlines in Australia – the Great Ocean Road, and a number of other important tourist attractions including an array</p>	<ul style="list-style-type: none"> <li>- The Shire’s tourism assets are categorised into eight tourism precincts, five of which are considered as <b>‘tourist retailing’ and given particular restrictions</b></li> </ul>

Policy name	Structure	Structure/Relevant sections
	of rural and forest environments	<p><b>through the use of the SUZ, schedule 5</b> where the primary purpose is to <b>provide for a range of tourist related uses, including tourist-related retailing, without detracting from the core of retail and service roles reserved for the Torquay Town Centre and Camp Road Shopping Centre at Anglesea</b></p> <ul style="list-style-type: none"> <li>- In the five precincts <b>the use of land as a shop requires a permit and is subject to a condition that the premises <i>'must only sell goods and services or hire goods predominantly associated with recognised tourist industries in the locality'</i>.</b> Any shop selling goods not in compliance with the condition is prohibited and liable for enforcement under the <i>Planning and Environment Act, 1987</i>.</li> <li>- Goods and services predominantly associated with recognised tourist industries include: <ul style="list-style-type: none"> <li>o Clothing, footwear, recreational and sporting goods associated with surfing, swimming &amp; the beach</li> <li>o Arts &amp; craft works, souvenirs and the like</li> <li>o Health &amp; Well-being services</li> <li>o Goods &amp; services that are ancillary to an approved tourist use in the zone (<b>Clause 21.08-2</b>)</li> </ul> </li> </ul>

Policy name	Structure	Structure/Relevant sections
<p><b>Clauses 21.10 – 21.17, Township Strategies</b></p>	<p>These clauses set out the strategic directions for Torquay/Jan Juc, Lorne, Anglesea, Aireys Inlet, Winchelsea, Moriac, Bellbrae and Deans Marsh</p>	<p><b>Torquay/Jan Juc</b></p> <ul style="list-style-type: none"> <li>- Torquay is considered the ‘capital’ of the Shire, and has experienced significant population growth in recent times including an increasing proportion of permanent residents. Jan Juc as the youngest population and is one of the Shire’s most rapidly growing areas.</li> </ul> <p>Relevant objectives and issues include:</p> <ul style="list-style-type: none"> <li>- To maintain a break between Torquay and Geelong</li> <li>- To accommodate population growth without promoting urban sprawl...</li> <li>- To maintain and enhance the distinct identity and coastal township character of Torquay/Jan Juc</li> <li>- To maintain the provision of permanent year-round jobs given the significant influence of tourism and surfing on the local economy</li> <li>- Anticipated growth in Torquay will be accommodated through the expansion of the Torquay Town Centre</li> </ul> <p><b>Lorne</b></p> <ul style="list-style-type: none"> <li>- Lorne is challenged by preserving its coastal township character, environmental values and scenic landscapes while experiencing increasing popularity</li> <li>- Planning for physical and social infrastructure needs is difficult because of a lack of information about the towns non-permanent population</li> <li>- One of the objectives includes a need to ensure that community infrastructure meets the needs of permanent residents and visitors</li> </ul> <p><b>Anglesea</b></p> <ul style="list-style-type: none"> <li>- Recognised as a ‘resort’ town</li> </ul>

Policy name	Structure	Structure/Relevant sections
		<p>with low rate of permanent residency</p> <p><b>Aireys Inlet</b></p> <ul style="list-style-type: none"> <li>- Low rate of permanent resident population but becoming increasingly popular as a destination</li> <li>- Development pressure should be directed away from small coastal townships and urban development confined within township boundaries</li> <li>- Contain commercial development within the two existing centres in Aireys Inlet</li> </ul> <p><b>Winchelsea</b></p> <ul style="list-style-type: none"> <li>- A historic country town with a special rural character</li> <li>- The principle agricultural centre of the Shire and has an important role to play in servicing its rural hinterland</li> <li>- Experiencing steady growth</li> <li>- Is promoted as a mixed-use activity centre</li> </ul> <p><b>Moriac</b></p> <ul style="list-style-type: none"> <li>- Moriac is a small rural hamlet with the majority of the population commuting to Geelong or beyond for employment</li> <li>- Basic community facilities are available, with few facilities available to accommodate youth activities in addition to a lack of public transport</li> <li>- There is a need for an area for service business to meet the needs of local residents and prevent these from being randomly located around the township as it grows</li> </ul> <p><b>Bellbrae</b></p> <ul style="list-style-type: none"> <li>- Located 4km west of Torquay and is a small service centre for the rural hinterland to the west that is evolving into a lifestyle option for those wishing to locate close to</li> </ul>

Policy name	Structure	Structure/Relevant sections
		<p>urban services of Torquay and Geelong</p> <ul style="list-style-type: none"> <li>- Has not experienced the growth like other townships due to lack of reticulated water and sewerage</li> </ul> <p><b>Deans Marsh</b></p> <ul style="list-style-type: none"> <li>- Located at the foot of the Otway Ranges and is a small country hamlet</li> <li>- Population statistics are unavailable and it is expected that permanent numbers are very low</li> <li>- Objectives support the growth and development of a sustainable community</li> </ul>
<b>Relevant Strategic Documents:</b>		
<p><b>Surf Coast Shire Community Plan: Your Visions</b></p>	<p>The document provides Surf Coast Shire and the community with a shared vision for the future. Each township was asked the following questions:</p> <ul style="list-style-type: none"> <li>- <i>What's good, What we value;</i></li> <li>- <i>What's not good, What needs improvement;</i></li> <li>- <i>Our top priorities, What we want in the future; and</i></li> <li>- <i>Youth and sector specific priorities</i></li> </ul>	<ul style="list-style-type: none"> <li>- <i>What's good, What we value</i></li> <li>- The environment, services (natural beauty of the area public amenities are good along the foreshores), townships (not too big) and people (good social mix, strong community spirit, lots of community groups)</li> <li>- <i>What's not good, What needs improvement</i></li> <li>- Environment (more protection especially the beaches), more sports and recreational facilities required, better footpaths needed, loss of local character due to overdevelopment and public transport inadequate</li> <li>- <i>Our top priorities, What we want in the future</i></li> <li>- Infrastructure (footpaths, sport and rec facilities, access to beach)</li> <li>- Planning and Development (to respect local character and limit development in coastal areas)</li> <li>- Council issues (support to local groups, responsive, community consultation)</li> </ul>



Policy name	Structure	Structure/Relevant sections
		<ul style="list-style-type: none"> <li>- Services (public transport, waste management, services for the elderly)</li> <li>- Tourism (reduce impacts of tourism)</li> </ul>
<p><b>Surf Coast Housing Policy Project</b></p> <p><b>May 2006</b></p>	<p>The Project identified the Shire's housing needs over the next 25 years and includes:</p> <ul style="list-style-type: none"> <li>- <b>Housing Strategy</b> (Vol 1)</li> <li>- <b>Research and Analysis Report</b> (Vol 2)</li> <li>- <b>Housing Demand and Supply</b> (Vol 3)</li> </ul> <p>The project will guide Council decision-making in the area of housing.</p> <p>The project includes a comprehensive implementation plan that identifies strategies, actions, parties responsible and timing for each issue.</p>	<p>Key issues of the project can be summarised as;</p> <ul style="list-style-type: none"> <li>- Sustainability</li> <li>- Affordability</li> <li>- Diversity</li> <li>- Infrastructure, Service and Transport</li> <li>- Character</li> </ul> <p><b><u>Sustainability</u></b></p> <ul style="list-style-type: none"> <li>- There are environmental constraints to growth particularly within the existing coastal settlements of Anglesea to Lorne due to significant vegetation and landscapes. There are also constraints within the hinterland towns in relation to the protection of agricultural land and the rural landscape.</li> <li>- In regards to sustainable development Torquay and Winchelsea are identified as the two areas of growth due to their access to reticulated sewerage, water supply and land availability.</li> </ul> <p><b><u>Affordability</u></b></p> <ul style="list-style-type: none"> <li>- Surf Coast is the least affordable regional municipality in Victoria when comparing housing rental costs</li> <li>- Housing costs for both purchase and rent have increased rapidly over the past 5 years</li> <li>- There is an imbalance between affordability within the coastal townships where housing costs are high and hinterland townships where</li> </ul>

Policy name	Structure	Structure/Relevant sections
		<p>housing costs are lower</p> <ul style="list-style-type: none"> <li>- Key worker housing is a particular problem for the Shire as there is a lack of low cost housing and this is having a negative economic affect on the Shire.</li> </ul> <p><b><u>Diversity</u></b></p> <ul style="list-style-type: none"> <li>- Increase housing diversity by providing a range of housing types to meet current and future needs.</li> <li>- Provision of diverse housing in central locations and new subdivisions, use innovative housing solutions such as adaptable housing, and older persons housing options.</li> </ul> <p><b><u>Infrastructure, Service and Transport</u></b></p> <ul style="list-style-type: none"> <li>- Achieve the timely and sustainable provision of physical, social, community, open space and transport infrastructure and services to meet current and future needs of residents and visitors.</li> <li>- There are currently poor linkages and access to community facilities and open space from residential areas</li> <li>- Lack of public transport, particularly outside Torquay/Jan Juc</li> </ul> <p><b><u>Character</u></b></p> <ul style="list-style-type: none"> <li>- The recent pressure for development within the Shire, particularly within the coastal townships has had a negative impact on township and neighbourhood character. This protection of character will be particularly important within the growth areas of Winchelsea and Torquay</li> </ul>
<p><b>Surf Coast Shire Council Plan 2005-2009</b></p>	<p>The Council Plan outlines the strategic direction for the Shire and the steps it will take in order to achieve its</p>	<ul style="list-style-type: none"> <li>- The vision for the Surf Coast Shire:</li> <li>- <i>“The Surf Coast Shire will be a vibrant, connected and healthy</i></li> </ul>

Policy name	Structure	Structure/Relevant sections
<b>Amended June 2006</b>	visions.	<p><i>community, valued for its unique blend of natural environment, opportunity and quality of life”</i></p> <ul style="list-style-type: none"> <li>- <u>Strategic objectives that relate to community infrastructure include:</u></li> <li>- <i>Provide Sustainable Financial Management</i> – a sound financial structure to deliver services to the community</li> <li>- <i>Be People Focused</i> - deliver innovative and quality service</li> <li>- <i>Build &amp; Maintain Surf Coast</i> - physical assets, responsive to community needs</li> <li>- <i>Promote community wellbeing</i> - places and spaces that promote health and wellbeing</li> </ul>
<b>Surf Coast Recreation November 2001</b>	A review of the 1996 Leisure Strategy plan and assessment of the recommendations that were made in that Strategy	<p>The report provides an audit of community facilities and particularly recreational facilities, clubs and open spaces. It highlights that many communities in the rural areas have to travel long distances to access a range of recreation facilities and community services.</p> <p>The plan identifies that there is currently a lack of adequate community and recreation facilities across the shire.</p>
<b>Surf Coast Shire Tourism Strategic Plan, 2006</b>	<p>A tourism strategy that sets key recommendations, strategies, and actions for future direction and development of tourism in the region over the next 5 years</p> <p>Vision for tourism in the Surf Coast Region is <i>“To provide the leading sustainable tourism experience in Australia”</i></p>	<p>The plan completes a SWOT analysis for the Surf Coast Shire which identified the following relevant points:</p> <p><u>Strengths</u></p> <ul style="list-style-type: none"> <li>- Surf industry and surf beaches</li> <li>- Natural environment</li> <li>- Range of activities and major events held in the region</li> <li>- Close proximity to Melbourne</li> <li>- Unique townships</li> </ul> <p><u>Weaknesses</u></p> <ul style="list-style-type: none"> <li>- lack of public transport</li> <li>- lack of local tourism data for Surf Coast including visitor profiles, visitor satisfaction</li> </ul>

Policy name	Structure	Structure/Relevant sections
		<p>and the impacts and benefits of tourism</p> <ul style="list-style-type: none"> <li>- difficulties in attracting labour force to the region particularly within Anglesea and Lorne due to high housing costs, low unemployment and limited public transport</li> </ul> <p><u>Opportunities</u></p> <ul style="list-style-type: none"> <li>- further development of eco tourism, marine and national parks</li> <li>- market food and wine, arts, heritage and bushwalking</li> <li>- develop themes for each township</li> <li>- increased accessibility for the region due to Geelong Bypass and Avalon airport</li> </ul> <p><u>Threats</u></p> <ul style="list-style-type: none"> <li>- there are peaks of visitation which are seasonal which creates sustainability issues for the Surf Coast and this impacts on local residents and the environment</li> <li>- there is overdevelopment within the region which threatens the qualities that tourists are attracted to within the area</li> <li>- the increased cost of fuel, road carrying capacity of the Great Ocean Road and the lack of car parking in peak times are all threats</li> <li>- the high cost of housing impacts upon attracting workers to the region</li> </ul> <p>Six strategies have been developed which respond to the issues that were identified within the plan:</p> <ul style="list-style-type: none"> <li>- Partnerships – establishing effective organisational arrangements</li> <li>- Funding Arrangements – ensuring continued appropriate funding base for tourism</li> <li>- Research and Communication – provide up to date</li> </ul>

Policy name	Structure	Structure/Relevant sections
		<p>information to support tourism planning and educate the industry and community</p> <ul style="list-style-type: none"> <li>- Promotion and Marketing – maximising the effectiveness of tourism marketing</li> <li>- Product and Infrastructure Development – identifying improvements and opportunities for tourism and infrastructure to meet the needs of the community and visitors</li> <li>- Industry Professionalism – Ensuring continuous improvement in business skills and customer service.</li> </ul>
<p><b>Surf Coast Shire Health and Wellbeing Plan 2006-2009</b></p>	<p>The Health and Wellbeing plan is the Shires Municipal Public Health plan which aims at planning, developing and delivering policies, services and programs that support and promote health and wellbeing.</p>	<p>Council has a role in creating:</p> <ul style="list-style-type: none"> <li>- Safe and healthy places to live</li> <li>- Social networks and support services</li> <li>- Opportunities to participate in decisions affecting the community</li> <li>- Good infrastructure such as land use schemes</li> </ul> <p>The strategy and action plan is a three year plan key issues that are identified within the plan include:</p> <ul style="list-style-type: none"> <li>- Understanding the sorts of environments that Surf Coast residents live in and the health issues that these create such as social isolation, lack of pedestrian access, farm safety</li> <li>- Lack of physical activity</li> <li>- Social isolation of farming communities and sea/tree change communities</li> <li>- Lack of public transport</li> <li>- Planning for young people, aged and disabled</li> <li>- Planning and providing environments which support healthy behaviour choices</li> </ul>
<p><b>The G21 Geelong Regional Plan: A Sustainable Growth Plan</b></p>	<p>The G21 Plan is a sustainable growth framework for the Geelong region that has the support of the G21 Alliance.</p>	<p>The G21 Alliance consists of the five municipalities of Colac Otway, Golden Plains, Greater Geelong, Queenscliff and Surf Coast, the State Government and over 150</p>

Policy name	Structure	Structure/Relevant sections
	<p>It is a unique growth plan collaboratively designed by key regional players with the support of state government.</p>	<p>businesses and community organisations within the region</p> <ul style="list-style-type: none"> <li>○ The <i>Geelong Regional Plan</i> (GRP) is a collaborative approach to regional development across a range of fronts over a three phase planning horizon to 2050</li> </ul> <p>The GRP influences a wide variety of policy and processes throughout the region including some of the broad themes in the Surf Coast Shire's <i>Health and Wellbeing Plan</i>.</p>

---

**16 Attachment 6 - Socio-Economic Data for Surf Coast Shire**

Please refer to spreadsheet

**Surf Coast Shire Socio Economic Data Sheet (based on 2006 Census Data unless specified)**

Suburb	Population	Age	Income	Household Type	Tenure Type	Housing Costs	Housing Stress	Level of Schooling Completed	Labour force	Diversity	Family Type
<b>Anglesea</b>	Population 2001: 2189 Population 2006: 2,290	Median Age: 46 Aged <30: 29.1% Aged 65+: 22.4%	Median Household Weekly Income: \$787 Median Weekly Individual Income: \$417	Group: 1.7% Lone Person: 28.8% Family: 63.4%	Average household size: 2.3 Households Fully Owned: 46.5% Households being purchased: 25.9% Households being rented: 19.9%	Median Monthly Housing Loan Repayment: \$1,083 Median Weekly rent: \$160	High, Medium or Low Levels- refer to Data Map for more detail medium	Year 12 or equivalent: 41.9% Year 11 or equivalent: 17.4% Year 10 or below: 31.8% Did not go to school: 8.6%	Labour Force Participation Rate: 53.4% Unemployment Rate: 2.1%	English Only: 92.9% German 0.8% Italian 0.3%	Couple family with children: 36.2% Couple family with no children: 50.1% One parent family: 12.9%
<b>Airey's Inlet</b>	Population 2001: 1025* Population 2006: 754 with Fairhaven: 1,048	Median Age: 43 Aged <30: 31.5% Aged 65+: 19.5%	Median Household Weekly Income: \$869 Median Weekly Individual Income: \$485	Group: 2.8% Lone Person: 27.4% Family: 57.3%	Average household size: 2.3 Households Fully Owned: 44.2% Households being purchased: 25.5% Households being rented: 19.9%	Median Monthly Housing Loan Repayment: \$180 Median Weekly rent: \$180	high	Year 12 or equivalent: 49.7% Year 11 or equivalent: 15.6% Year 10 or below: 22.2% Did not go to school: 0.0%	Labour Force Participation Rate: 52.9% Unemployment Rate: 1.4%	English Only: 90.2% Italian .7% German .5%	Couple family with children: 44.9% Couple family with no children: 41.0% One parent family: 14.0%
<b>Bellbrae</b>	Population 2001: N/A Population 2006: 1,389	Median Age: 41 Aged <30: 38.4% Aged 65+: 9.4%	Median Household Weekly Income: \$1,224 Median Weekly Individual Income: \$533	Group: 1.3% Lone Person: 9.7% Family: 82.1%	Average household size: 3.1 Households Fully Owned: 43.6% Households being purchased: 40.5% Households being rented: 8.8%	Median Monthly Housing Loan Repayment: \$180 Median Weekly rent: \$150	medium	Year 12 or equivalent: 50.6% Year 11 or equivalent: 18.3% Year 10 or below: 23.6% Did not go to school: 0.57%	Labour Force Participation Rate: 66.2% Unemployment Rate: 1.7%	English Only: 93.2% Italian 1.1% Greek 1.6%	Couple family with children: 57.7% Couple family with no children: 34.3% One parent family: 8.0%
<b>Birregurra (part)</b>	Population 2001: 424 Population 2006: 688	Median Age: 40 Aged <30: 38.4% Aged 65+: 13.4%	Median Household Weekly Income: \$745 Median Weekly Individual Income: \$418	Group: 1.1% Lone Person: 33.2% Family: 61.8%	Average household size: 2.4 Households Fully Owned: 43.8% Households being purchased: 35.0% Households being rented: 14.5%	Median Monthly Housing Loan Repayment: \$140 Median Weekly rent: \$867	medium-high	Year 12 or equivalent: 34.2% Year 11 or equivalent: 19.5% Year 10 or below: 36.4% Did not go to school: 0.0%	Labour Force Participation Rate: 66.2% Unemployment Rate: 1.20%	English Only: 92.6% Greek .9% Gaelic .6%	Couple family with children: 44.9% Couple family with no children: 41.0% One parent family: 14.0%
<b>Connawarre (part)**</b>	Population 2001: N/A Population 2006: 78	Median Age: N/A Aged <30: N/A Aged 65+: N/A	Median Household Weekly Income: N/A Median Weekly Individual Income: N/A	Group: N/A Lone Person: N/A Family: N/A	Average household size: N/A Households Fully Owned: N/A Households being purchased: N/A Households being rented: N/A	Median Monthly Housing Loan Repayment: N/A Median Weekly rent: N/A	medium	Year 12 or equivalent: N/A Year 11 or equivalent: N/A Year 10 or below: N/A Did not go to school: N/A	Labour Force Participation Rate: N/A Unemployment Rate: N/A	N/A	Couple family with children: N/A Couple family with no children: N/A One parent family: N/A
<b>Deans Marsh</b>	Population 2001: N/A Population 2006: 631	Median Age: 44 Aged <30: 32.5% Aged 65+: 11.9%	Median Household Weekly Income: \$934 Median Weekly Individual Income: \$473	Group: 1.3% Lone Person: 14.8% Family: 76.8%	Average household size: 2.5 Households Fully Owned: 45.6% Households being purchased: 29.5% Households being rented: 15.2%	Median Monthly Housing Loan Repayment: \$140 Median Weekly rent: \$1146	medium-high	Year 12 or equivalent: 42.8% Year 11 or equivalent: 21.1% Year 10 or below: 28.4% Did not go to school: 0.0%	Labour Force Participation Rate: 64.9% Unemployment Rate: 1.7%	English Only: 92.6% Serbian 1.6% German .6%	Couple family with children: 34.1% Couple family with no children: 51.6% One parent family: 14.3%
<b>Fairhaven</b>	Population 2001: N/A Population 2006: 294	Median Age: 45 Aged <30: 32.6% Aged 65+: 19.7%	Median Household Weekly Income: \$1,040 Median Weekly Individual Income: \$508	Group: 0.0% Lone Person: 19.8% Family: 48.3%	Average household size: 2.4 Households Fully Owned: 35.3% Households being purchased: 27.6% Households being rented: 6.9%	Median Monthly Housing Loan Repayment: \$160 Median Weekly rent: \$1220	medium-high	Year 12 or equivalent: 45.1% Year 11 or equivalent: 13.6% Year 10 or below: 14.4% Did not go to school: 0.0%	Labour Force Participation Rate: 33.40% Unemployment Rate: 1.2%	English Only 73.1% Dutch 2%	Couple family with children: 43.1% Couple family with no children: 39.7% One parent family: 10.3%
<b>Freshwater Creek</b>	Population 2001: N/A Population 2006: 557	Median Age: 43 Aged <30: 36.6% Aged 65+: 11.7%	Median Household Weekly Income: \$1,031 Median Weekly Individual Income: \$446	Group: 1.6% Lone Person: 13.3% Family: 80.9%	Average household size: 2.8 Households Fully Owned: 43.1% Households being purchased: 36.2% Households being rented: 15.4%	Median Monthly Housing Loan Repayment: \$108 Median Weekly rent: \$1354	medium	Year 12 or equivalent: 38.8% Year 11 or equivalent: 17.2% Year 10 or below: 34.9% Did not go to school: 0.65%	Labour Force Participation Rate: 63.4% Unemployment Rate: 0.0%	English Only 89.6% Italian 1.6% Serbian 1.4%	Couple family with children: 55.2% Couple family with no children: 35.7% One parent family: 9.1%
<b>Gherang</b>	Population 2001: N/A Population 2006: 592	Median Age: 38 Aged <30: 37.5% Aged 65+: 6.8%	Median Household Weekly Income: \$1,205 Median Weekly Individual Income: \$517	Group: 0.0% Lone Person: 14.8% Family: 82.3%	Average household size: 2.9 Households Fully Owned: 41.4% Households being purchased: 48.8% Households being rented: 6.4%	Median Monthly Housing Loan Repayment: \$51 Median Weekly rent: \$1247	medium	Year 12 or equivalent: 39.0% Year 11 or equivalent: 21.9% Year 10 or below: 34.7% Did not go to school: 0.0%	Labour Force Participation Rate: 71.7% Unemployment Rate: 3.3%	English Only 97.1% French .5% Dutch .5%	Couple family with children: 57.5% Couple family with no children: 36.5% One parent family: 6.0%
<b>Gnarwarre</b>	Population 2001: N/A Population 2006: 834	Median Age: 39 Aged <30: 39.1% Aged 65+: 9.1%	Median Household Weekly Income: \$1,372 Median Weekly Individual Income: \$502	Group: 2.8% Lone Person: 10.3% Family: 86.5%	Average household size: 3 Households Fully Owned: 43.6% Households being purchased: 43.6% Households being rented: 9.2%	Median Monthly Housing Loan Repayment: \$140 Median Weekly rent: \$1450	medium	Year 12 or equivalent: 37.8% Year 11 or equivalent: 21.2% Year 10 or below: 37.8% Did not go to school: 0.47%	Labour Force Participation Rate: 74.5% Unemployment Rate: 2.1%	English Only 95.6% Swedish 0.7% Auslan 0.6%	Couple family with children: 55.7% Couple family with no children: 36.9% One parent family: 7.4%
<b>Inverleigh (part in SCS)</b>	Population 2001: 515 Population 2006: 1,253	Median Age: 37 Aged <30: 40.4% Aged 65+: 8.5%	Median Household Weekly Income: \$1,071 Median Weekly Individual Income: \$435	Group: 2.5% Lone Person: 14.7% Family: 82.5%	Average household size: 2.9 Households Fully Owned: 38.7% Households being purchased: 48.4% Households being rented: 10.4%	Median Monthly Housing Loan Repayment: \$110 Median Weekly rent: \$1200	medium	Year 12 or equivalent: 34.9% Year 11 or equivalent: 22.7% Year 10 or below: 38.3% Did not go to school: 0.0%	Labour Force Participation Rate: 65.5% Unemployment Rate: 3.2%	English Only 96.8% Italian 5% Maltese .4%	Couple family with children: 54.4% Couple family with no children: 36.7% One parent family: 8.9%
<b>Jan Juc</b>	Population 2001: N/A Population 2006: 3,158	Median Age: 34 Aged <30: 42.3% Aged 65+: 6.2%	Median Household Weekly Income: \$1,154 Median Weekly Individual Income: \$561	Group: 6.2% Lone Person: 17.8% Family: 70.0%	Average household size: 2.7 Households Fully Owned: 28.5% Households being purchased: 42.4% Households being rented: 23.3%	Median Monthly Housing Loan Repayment: \$220 Median Weekly rent: \$1300	high	Year 12 or equivalent: 56.9% Year 11 or equivalent: 15.8% Year 10 or below: 19.3% Did not go to school: 0.002%	Labour Force Participation Rate: 70.4% Unemployment Rate: 2.5%	English Only: 92.1% Italian 0.5% German 0.4%	Couple family with children: 53.3% Couple family with no children: 32.6% One parent family: 13.2%
<b>Lorne</b>	Population 2001: 1,165 Population 2006: 967	Median Age: 49 Aged <30: 25.5% Aged 65+: 23.9%	Median Household Weekly Income: \$942 Median Weekly Individual Income: \$465	Group: 2.9% Lone Person: 23.1% Family: 50.1%	Average household size: 2.1 Households Fully Owned: 42.7% Households being purchased: 15.9% Households being rented: 23.4%	Median Monthly Housing Loan Repayment: \$205 Median Weekly rent: \$1,094	high	Year 12 or equivalent: 44.4% Year 11 or equivalent: 14.3% Year 10 or below: 25.4% Did not go to school: 0.0%	Labour Force Participation Rate: 52.0% Unemployment Rate: 1.3%	English Only: 84.3% Italian 1.1% Greek 1%	Couple family with children: 33.9% Couple family with no children: 51.1% One parent family: 14.9%
<b>Moggs Creek**</b>	Population 2001: N/A Population 2006: 100	Median Age: N/A Aged <30: N/A Aged 65+: N/A	Median Household Weekly Income: N/A Median Weekly Individual Income: N/A	Group: N/A Lone Person: N/A Family: N/A	Average household size: N/A Households Fully Owned: N/A Households being purchased: N/A Households being rented: N/A	Median Monthly Housing Loan Repayment: N/A Median Weekly rent: N/A	high	Year 12 or equivalent: N/A Year 11 or equivalent: N/A Year 10 or below: N/A Did not go to school: N/A	Labour Force Participation Rate: N/A Unemployment Rate: N/A	N/A	Couple family with children: N/A Couple family with no children: N/A One parent family: N/A
<b>Moriac</b>	Population 2001: N/A Population 2006: 594	Median Age: 33 Aged <30: 44.6% Aged 65+: 6.6%	Median Household Weekly Income: \$1,311 Median Weekly Individual Income: \$518	Group: 1.7% Lone Person: 6.1% Family: 87.8%	Average household size: 3.3 Households Fully Owned: 29.4% Households being purchased: 65.0% Households being rented: 3.9%	Median Monthly Housing Loan Repayment: \$106 Median Weekly rent: \$1,257	medium	Year 12 or equivalent: 39.4% Year 11 or equivalent: 24.8% Year 10 or below: 31.9% Did not go to school: 0.0%	Labour Force Participation Rate: 71.6% Unemployment Rate: 1.5%	English Only: 98% Persian 0.7%	Couple family with children: 62.8% Couple family with no children: 29.3% One parent family: 7.9%
<b>Mount Duneed (part)</b>	Population 2001: N/A Population 2006: 985	Median Age: 42 Aged <30: 37.2% Aged 65+: 10.5%	Median Household Weekly Income: \$1,159 Median Weekly Individual Income: \$476	Group: 1.5% Lone Person: 12.2% Family: 83.2%	Average household size: 2.9 Households Fully Owned: 51.1% Households being purchased: 35.5% Households being rented: 9.5%	Median Monthly Housing Loan Repayment: \$180 Median Weekly rent: \$1,264	medium	Year 12 or equivalent: 43.7% Year 11 or equivalent: 21.4% Year 10 or below: 30.2% Did not go to school: 0.0%	Labour Force Participation Rate: 67.8% Unemployment Rate: 2.1%	English Only 94.9% German 1.1% Spanish 0.5%	Couple family with children: 52.5% Couple family with no children: 40.6% One parent family: 6.8%
<b>Ombersley**</b>	Population 2001: N/A Population 2006: 90	Median Age: N/A Aged <30: N/A Aged 65+: N/A	Median Household Weekly Income: N/A Median Weekly Individual Income: N/A	Group: N/A Lone Person: N/A Family: N/A	Average household size: N/A Households Fully Owned: N/A Households being purchased: N/A Households being rented: N/A	Median Monthly Housing Loan Repayment: N/A Median Weekly rent: N/A	medium	Year 12 or equivalent: N/A Year 11 or equivalent: N/A Year 10 or below: N/A Did not go to school: N/A	Labour Force Participation Rate: N/A Unemployment Rate: N/A	N/A	Couple family with children: N/A Couple family with no children: N/A One parent family: N/A



Suburb	Population	Age	Income	Household Type	Average household size	Tenure Type	Housing Costs	Housing Stress	Level of Schooling Completed	Labour force	Diversity	Family Type
Torquay	Population 2001	7943***										
	Population 2006	6695										
	Population change	24%***										
Winchelsea	Population 2001	1,102										
	Population 2006	1,920										
	Population change	74.2%										
Winchelsea South	Population 2001	N/A										
	Population 2006	296										
	Population change	N/A										
Surf Coast Shire	Population 2001	19,461										
	Population 2006	21,771										
	Population change	11.8%										
Victoria	Population 2001	4,612,097										
	Population 2006	4,932,422										
	Population change	6.9%										

**Notes:**

- ① For people aged 15 years and over
- ② A family is defined by the ABS as two or more persons, one of whom is at least 15 years of age, who are related by blood, marriage (registered or de facto), adoption, step or fostering, and who are usually resident in the same household.
- ③ Includes being rented by a real-estate agent, state or territory housing authority
- ④ Labour Force Participation - percentage of people aged over 15 who are in the labour force (includes unemployed persons)
- ⑤ Lists the top 3 languages other than English spoken at home with the suburb

Source ABS 2006 Census of Population and Housing

Unintended figure for AVEY'S listed and furnished.

Reminders have changed between 2001 and 2006 Census

\*\* Limited information is available on these towns due to its low population count

\*\*\* Combined figure for Torquay and Jan Juc

Please note that township boundaries for several regions have changed between the 2001 and 2006 census and therefore population changes within some townships between these years should be viewed with caution.

---

## 17 Attachment 7 – Spatial Audit

Clause 52.28-4 of the Victorian Planning provisions defines strip shopping areas 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 about a road accessible to the public generally;

These tests have been applied in the following way in the audit of strip shopping centres in the Surf Coast Shire .

### The first test:

- “Zoned for business use” includes all business zones.

### The second test:

- As it reads

### The third test:

Normally this will entail:

- More than 1/3 of the area being shops. Area will normally be defined as a “block”
  - o A block will be the land between two public roads (or laneways), abutting a publicly accessible road/laneway and at least one lot deep
- However if land between two public roads is in more than one zone then the area will only include that part zoned for business purposes
- ‘Buildings’ are interpreted as structures i.e. excludes vacant land (irrespective of if it meets the other criteria)
- ‘Shops’ as per the VPP definition.

However what a reasonable person would consider a “strip shopping centre” is likely to include a variety of uses not technically defined as a shop, such as real estate agents, banks, take away food shops and laundromats. As such it is considered that if a small, contained part of a larger, predominantly compliant centre does not meet the definition above (perhaps because the area had less than a third of buildings used as ‘shops’) it would be unreasonable to exclude this area from the overall strip shopping centre. Importantly, however, any peripheral areas failing the definition of ‘shop’ will be excluded.

Where a strip shopping complex contains a vacant building that appears to have been previously used as a shop and is likely to still be capable of this use, it is considered to meet the VPP definition of ‘shop’ on the basis of a likelihood of continued future use.

**The fourth test:**

- 'Road accessible to the public generally' irrespective of ownership and whether the road is primarily used for vehicular or pedestrian access.

**Strip Shopping Centre Audit**

The audit examined all areas in a business zone and areas in non-business zones which might include potential shopping areas.

**Shopping Complexes**

Shopping complex are considered to be stand-alone buildings containing one or more shops.

Surf Coast Shire – Site Assessment Matrix

Location	Suburb	Zone/ zones	Strip Shopping Centre	52.28-3 Prohibition- Shopping Complex	Reasoning
<b>Surf City Strip</b>	Torquay	SUZ	Yes	Yes, partially	<ul style="list-style-type: none"> <li>• Surf Coast Plaza prohibited under 52.28-3.</li> <li>• Recommend SUZ to the north of Surf Coast Plaza and to the east of Surf Coast Highway for inclusion under 52.28-4 and a portion of this SUZ for inclusion under 52.28-3.</li> <li>• Gaming is discouraged in surrounding areas.</li> </ul>
<b>Torquay Town Centre</b>	Torquay	CDZ1, B1Z, SUZ	Yes	No	<ul style="list-style-type: none"> <li>• Recommend B1Z and a portion of SUZ and CDZ for inclusion under 52.28-4.</li> <li>• Recommend Torquay Central for inclusion under 52.28-3.</li> <li>• Gaming is discouraged in surrounding areas</li> </ul>
<b>Bell St</b>	Torquay	B1Z	Yes	Yes, partially recommended	<ul style="list-style-type: none"> <li>• Recommend B1Z to the west of Munday Street for inclusion under 52.28-4.</li> <li>• Recommend B1Z to the east of Munday Street for inclusion under 52.28-3 as consists of one lot with multiple tenancies/shops</li> <li>• Gaming is discouraged in surrounding area</li> </ul>
<b>Geelong Road</b>	Torquay	B1Z	Yes	No	<ul style="list-style-type: none"> <li>• Recommend B1Z for inclusion into 52.28-4</li> <li>• Gaming is discouraged in</li> </ul>

Location	Suburb	Zone/ zones	Strip Shopping Centre	52.28-3 Prohibition- Shopping Complex	Reasoning
					surrounding area
<b>Sunset Strip</b>	Jan Juc	B1Z	No	No	<ul style="list-style-type: none"> <li>Most of the tenancies are food or beverage venues which do not classify as shops</li> <li>Gaming is discouraged in this area</li> </ul>
<b>McMillan Street/Great Ocean Road</b>	Anglesea	B1Z	No	No	<ul style="list-style-type: none"> <li>Most of tenancies are food or beverage venues which do not classify as shops</li> <li>Gaming is discouraged in this area</li> </ul>
<b>Walker Street/Great Ocean Road</b>	Anglesea	B1Z	Yes	No	<ul style="list-style-type: none"> <li>Recommend B1Z for inclusion into 52.28-4</li> <li>Gaming is discouraged in surrounding area</li> </ul>
<b>Tonge Street/Great Ocean Road</b>	Anglesea	B1Z	Yes	No	<ul style="list-style-type: none"> <li>Recommend partial SUZ for inclusion into 52.28-4</li> <li>Gaming is discouraged in surrounding area</li> </ul>
<b>Great Ocean Rd/ Albert Ave</b>	Aireys Inlet	B1Z	Yes	No	<ul style="list-style-type: none"> <li>Recommend partial B1Z for inclusion into 52.28-4</li> <li>Gaming is discouraged in surrounding area</li> </ul>
<b>River reserve Road/Great Ocean Road</b>	Aireys Inlet	B1Z	No	Yes, partially recommended	<ul style="list-style-type: none"> <li>Recommend partial B1Z for inclusion into 52.28-3 as consists of one lot with multiple tenancies/shops</li> <li>Gaming is discouraged in surrounding area</li> </ul>

Location	Suburb	Zone/ zones	Strip Shopping Centre	52.28-3 Prohibition- Shopping Complex	Reasoning
<b>Town Centre</b>	Lorne	B1Z	Yes	Yes, partially recommended	<ul style="list-style-type: none"> <li>• Recommend 148-174 Mount Joy Parade for inclusion under 52.28-3 as consists of a large complex comprising of shops, restaurants, cafes and accommodations</li> <li>• Recommend sections of B1Z for inclusion into 52.28-3 as comprise of one lot with multiple tenancies/shops</li> <li>• Recommend entire B1Z for inclusion under 52.28-4</li> <li>• Gaming is discouraged in surrounding areas</li> </ul>
<b>Mount Joy Road/Clissold St</b>	Lorne	B1Z	No	Yes- partially recommended	<ul style="list-style-type: none"> <li>• Recommend supermarket for inclusion in 52.28-3</li> <li>• Gaming is discouraged in surrounding area</li> </ul>
<b>Willis St</b>	Winchelsea	B1Z	Yes	Yes, Partially recommended	<ul style="list-style-type: none"> <li>• Recommend inclusion of supermarket into 52.28-3</li> <li>• Recommend B1Z between Hesse and Palmer Streets for inclusion into 52.28-4</li> <li>• Gaming is discouraged in surrounding areas</li> </ul>
<b>Main St</b>	Winchelsea	B1Z	Yes	No	<ul style="list-style-type: none"> <li>• Recommend B1Z to east main street for inclusion in 52.28-4</li> <li>• Recommend partial B1Z to west main street for inclusion in 52.28-4</li> <li>• Gaming is discouraged in surrounding area</li> </ul>



- Strip Shopping Centres (recommended)
- ..... Shopping Complexes (existing)
- Shopping Complexes (recommended)
- //// Discouraged Areas

## Strip Shopping Centres

Drawing No 133167

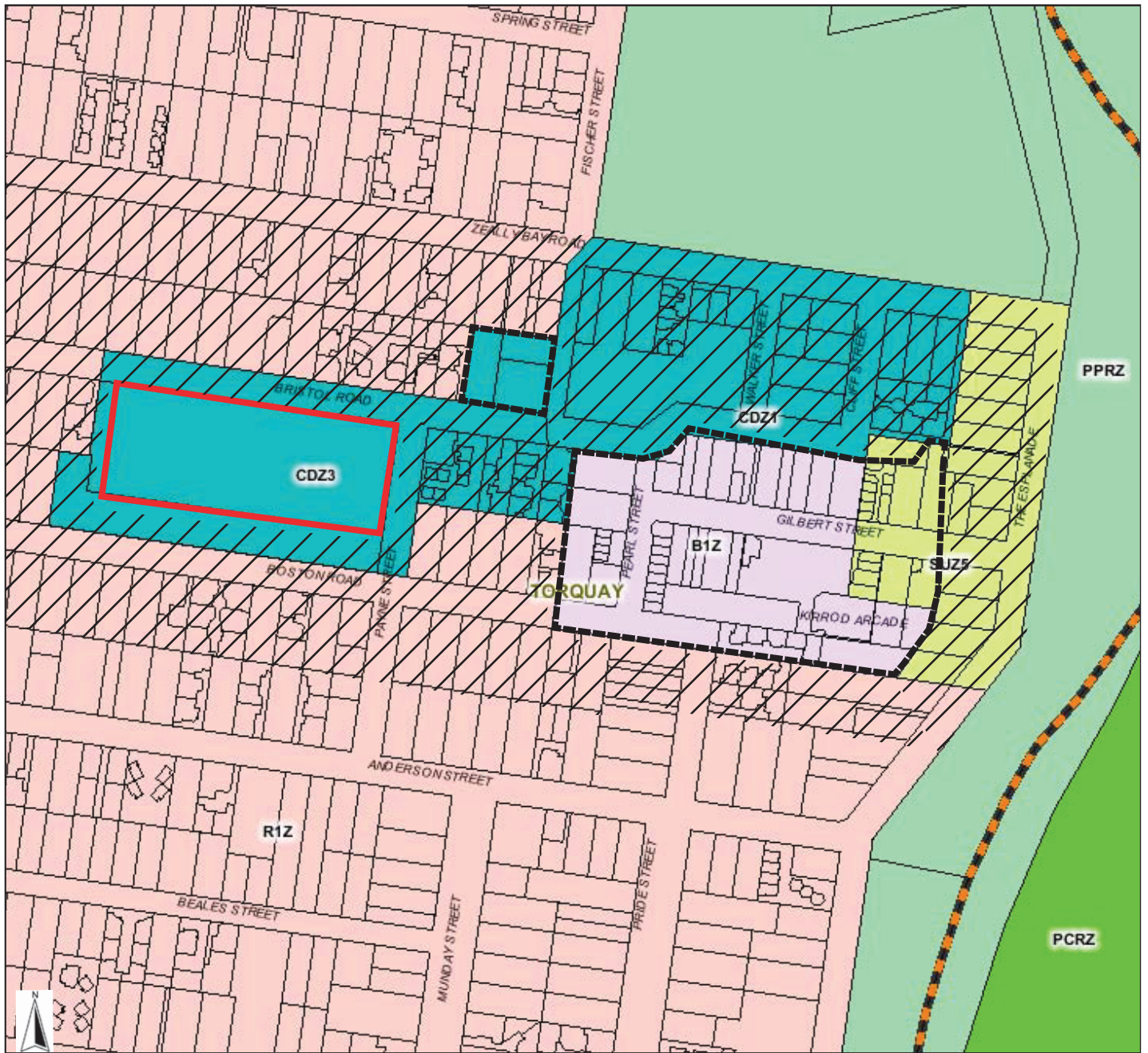
Date October 2007

Coomes Consulting Group Pty Ltd – A subsidiary of Downer EDI  
Melbourne Shepparton Bendigo Albury Geelong

Engineering Surveying Planning Urban Design Landscape Architecture  
Sustainability and Environment Agribusiness Project Management Strategic Consulting

Surf City Strip- Torquay

coomes consulting



- Strip Shopping Centres (recommended)
- ..... Shopping Complexes (existing)
- Shopping Complexes (recommended)
- //// Discouraged Areas

## Strip Shopping Centres

Drawing No 133167

Date October 2007

Coomes Consulting Group Pty Ltd – A subsidiary of Downer EDI  
Melbourne Shepparton Bendigo Albury Geelong

Engineering Surveying Planning Urban Design Landscape Architecture  
Sustainability and Environment Agribusiness Project Management Strategic Consulting

Torquay Town Centre

coomes consulting

© Coomes Consulting Group Pty Ltd





- Strip Shopping Centres (recommended)
- ..... Shopping Complexes (existing)
- Shopping Complexes (recommended)
- ////// Discouraged Areas

### Strip Shopping Centres

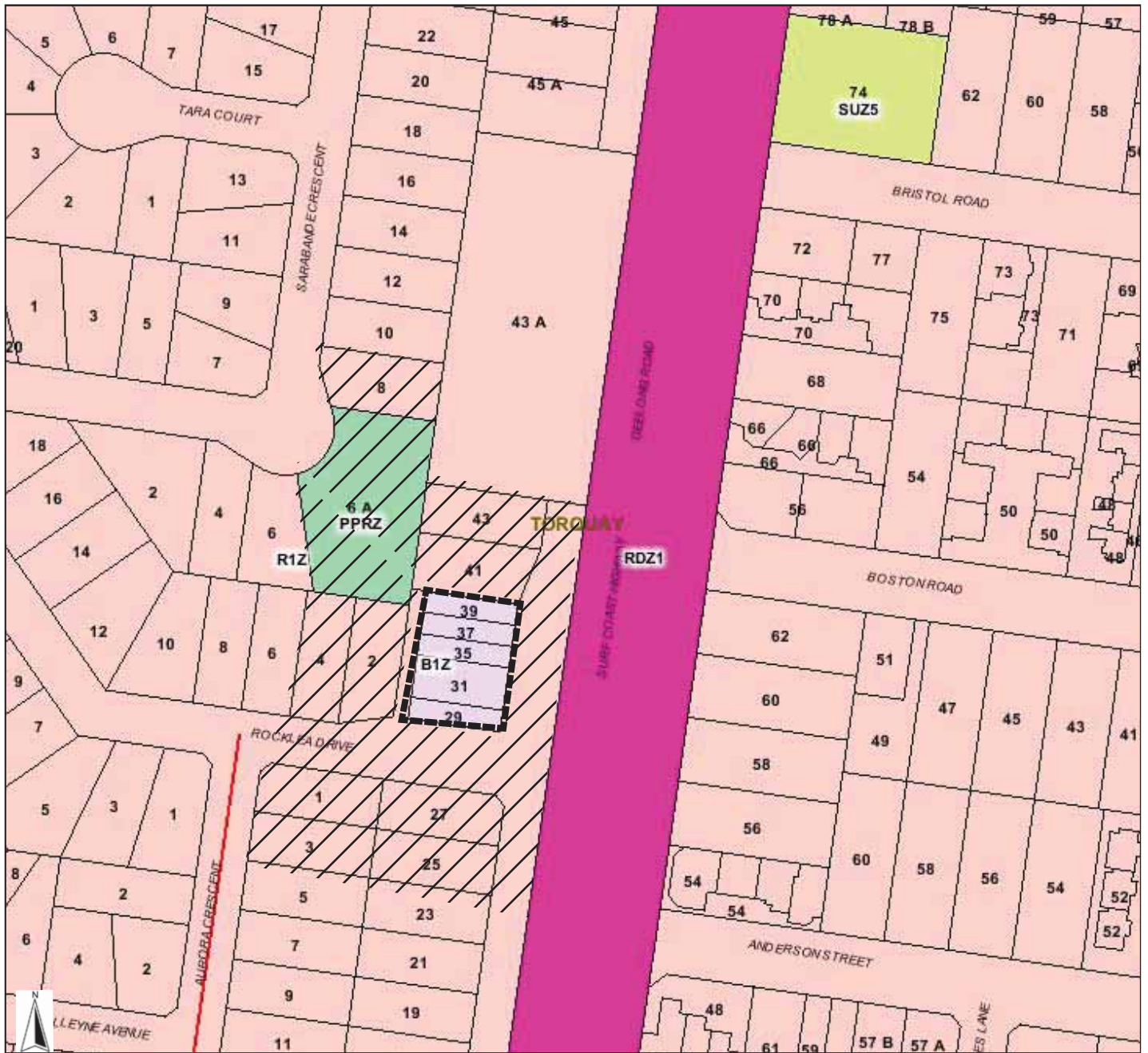
Drawing No 133167 Date October 2007

Coomes Consulting Group Pty Ltd – A subsidiary of Downer EDI  
Melbourne Shepparton Bendigo Albury Geelong

Engineering Surveying Planning Urban Design Landscape Architecture  
Sustainability and Environment Agribusiness Project Management Strategic Consulting

Bell St - Torquay

coomes consulting



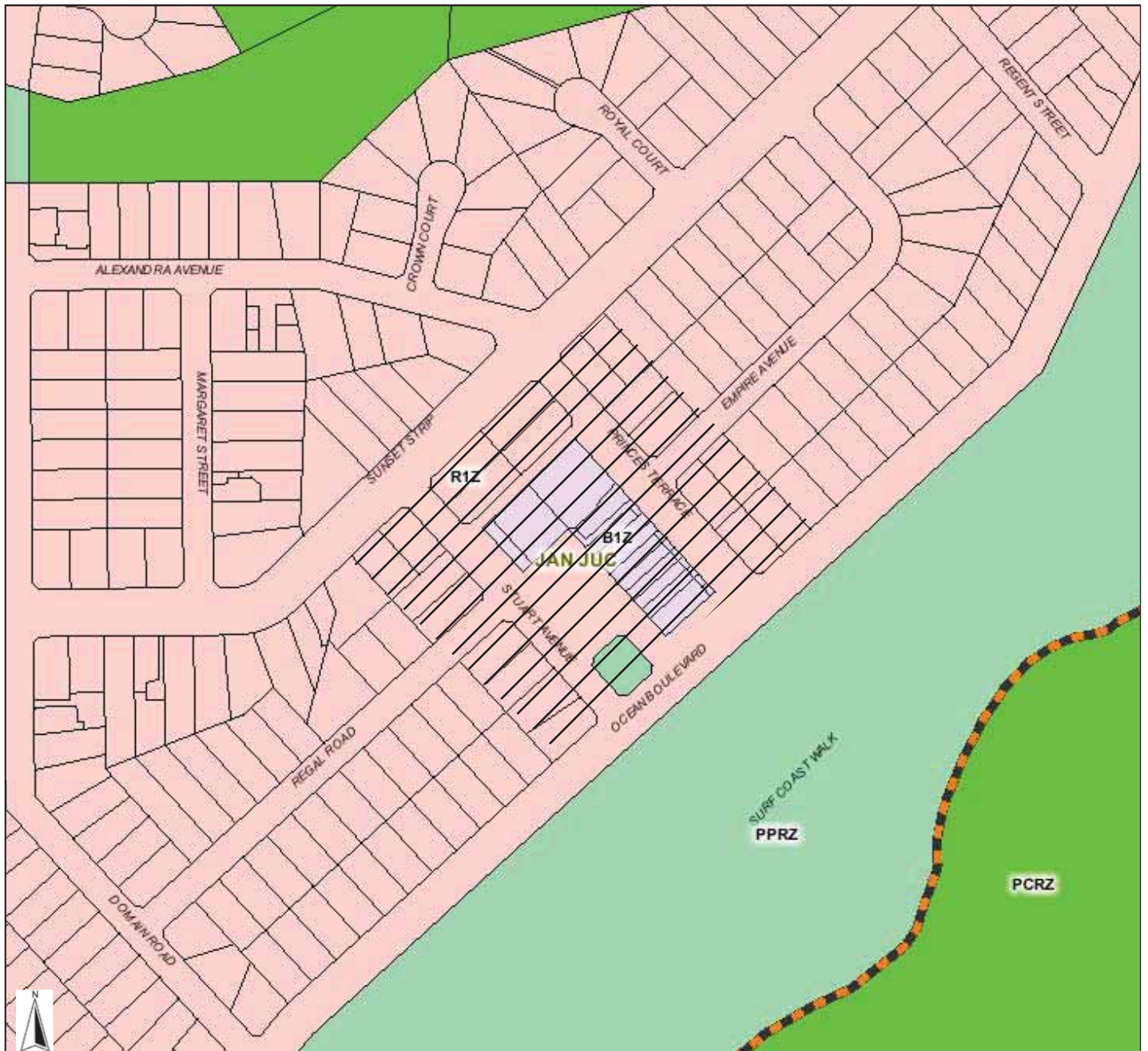
- ▬▬▬▬ Strip Shopping Centres (recommended)
- Shopping Complexes (existing)
- ▬▬▬▬ Shopping Complexes (recommended)
- ▨▨▨▨ Discouraged Areas

### Strip Shopping Centres

Drawing No 133167 Date October 2007

Coomes Consulting Group Pty Ltd – A subsidiary of Downer EDI  
 Melbourne Shepparton Bendigo Albury Geelong

Engineering Surveying Planning Urban Design Landscape Architecture  
 Sustainability and Environment Agribusiness Project Management Strategic Consulting



- Strip Shopping Centres (recommended)
- ..... Shopping Complexes (existing)
- Shopping Complexes (recommended)
- ////// Discouraged Areas

### Strip Shopping Centres

Drawing No 133167 Date October 2007

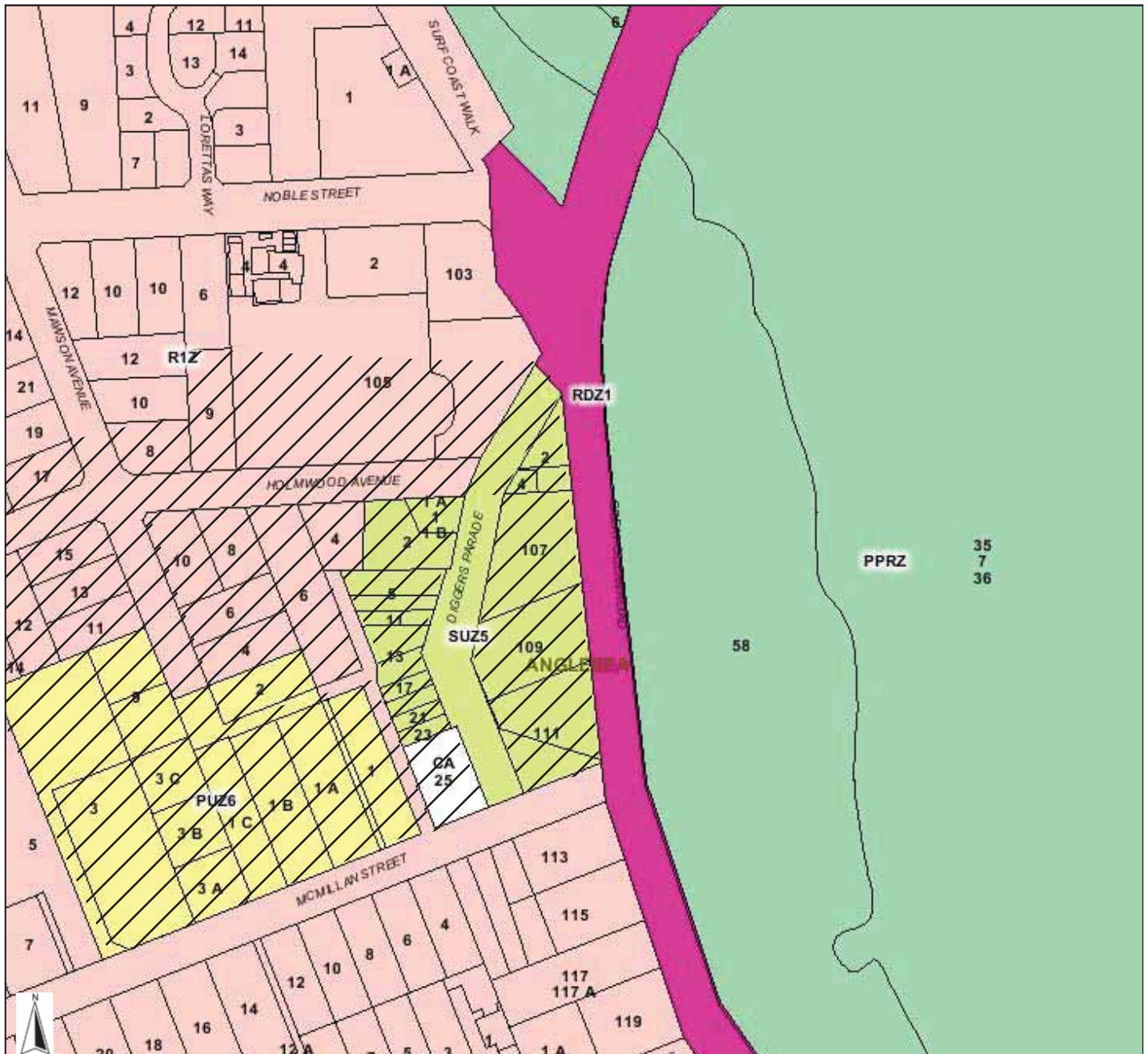
Coomes Consulting Group Pty Ltd – A subsidiary of Downer EDI  
Melbourne Shepparton Bendigo Albury Geelong

Engineering Surveying Planning Urban Design Landscape Architecture  
Sustainability and Environment Agribusiness Project Management Strategic Consulting

Jan Juc

coomes consulting

© Coomes Consulting Group Pty Ltd



- Strip Shopping Centres (recommended)
- Shopping Complexes (existing)
- Shopping Complexes (recommended)
- ▨▨▨▨▨ Discouraged Areas

### Strip Shopping Centres

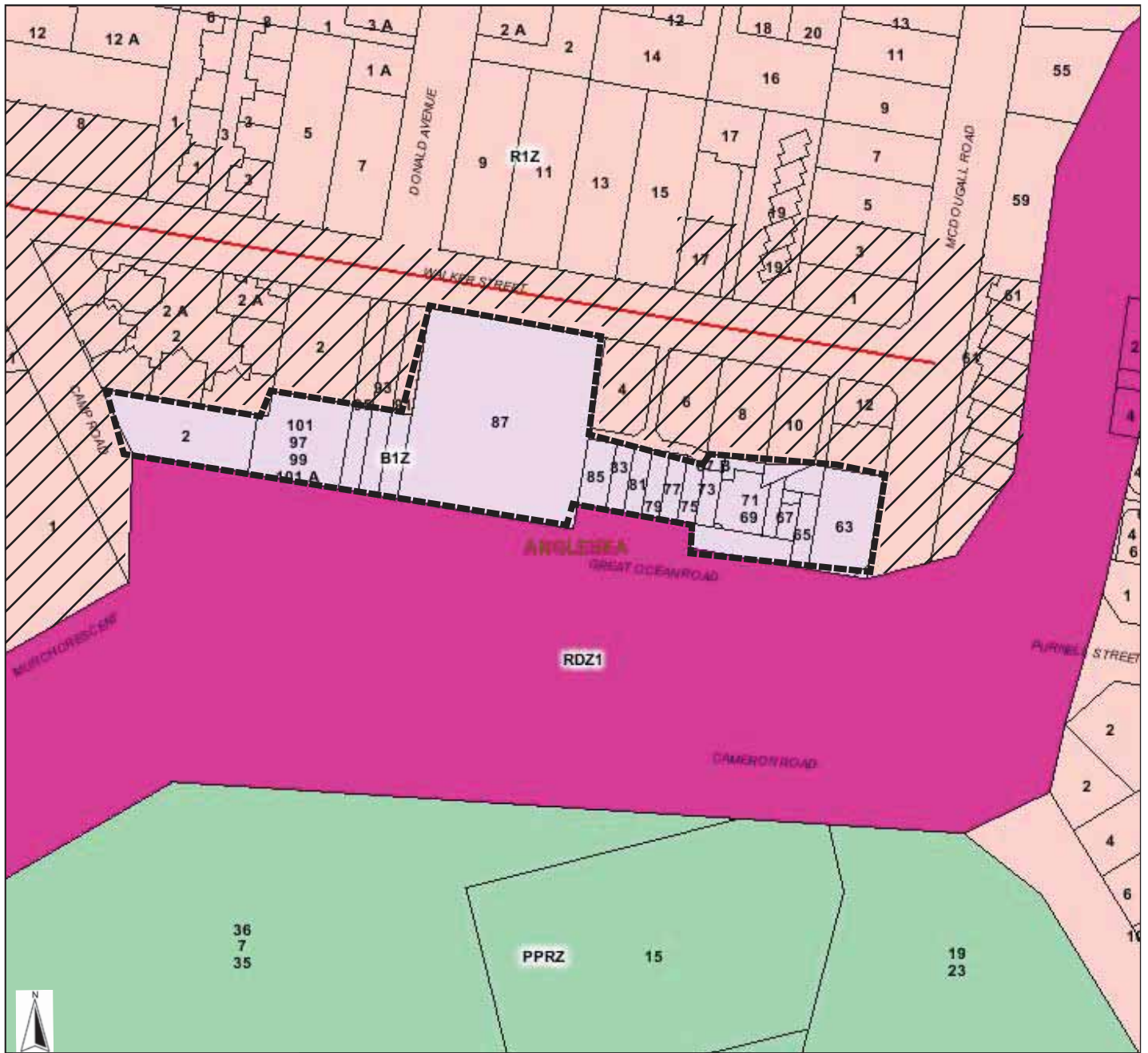
Drawing No 133167 Date October 2007

Coomes Consulting Group Pty Ltd – A subsidiary of Downer EDI  
 Melbourne Shepparton Bendigo Albury Geelong

Engineering Surveying Planning Urban Design Landscape Architecture  
 Sustainability and Environment Agribusiness Project Management Strategic Consulting

McMillan St/ Great Ocean Road Anglesea

coomes consulting



- Strip Shopping Centres (recommended)
- ..... Shopping Complexes (existing)
- Shopping Complexes (recommended)
- //// Discouraged Areas

### Strip Shopping Centres

Drawing No 133167 Date October 2007

Coomes Consulting Group Pty Ltd – A subsidiary of Downer EDI  
 Melbourne Shepparton Bendigo Albury Geelong

Engineering Surveying Planning Urban Design Landscape Architecture  
 Sustainability and Environment Agribusiness Project Management Strategic Consulting

Walker St/ Great Ocean Road- Anglesea

coomes consulting



- Strip Shopping Centres (recommended)
- ..... Shopping Complexes (existing)
- Shopping Complexes (recommended)
- ////// Discouraged Areas

### Strip Shopping Centres

Drawing No 133167 Date October 2007

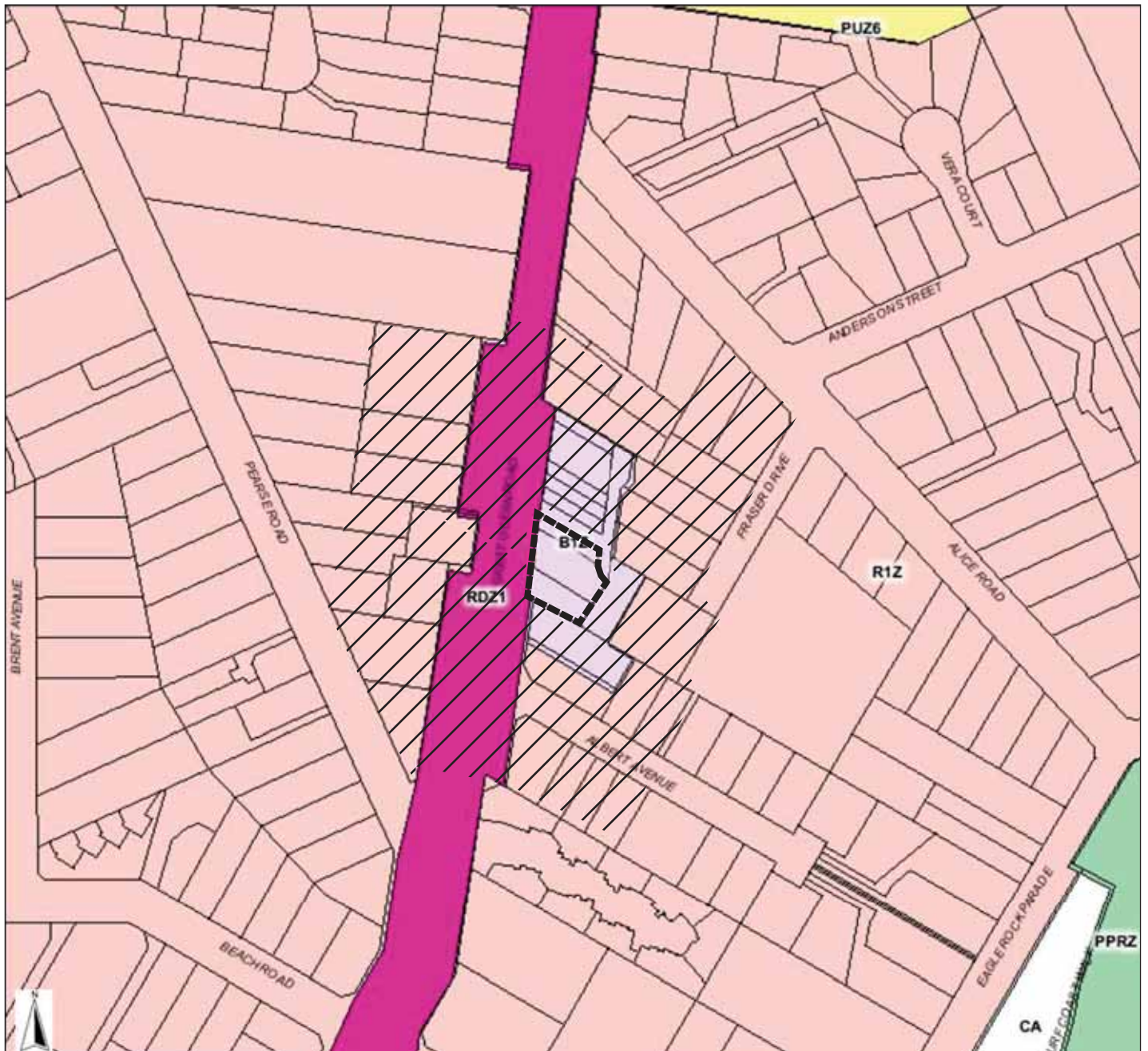
Coomes Consulting Group Pty Ltd – A subsidiary of Downer EDI  
 Melbourne Shepparton Bendigo Albury Geelong

Engineering Surveying Planning Urban Design Landscape Architecture  
 Sustainability and Environment Agribusiness Project Management Strategic Consulting

Tongue Street/Great Ocean Road- Anglesea

coomes consulting

© Coomes Consulting Group Pty Ltd



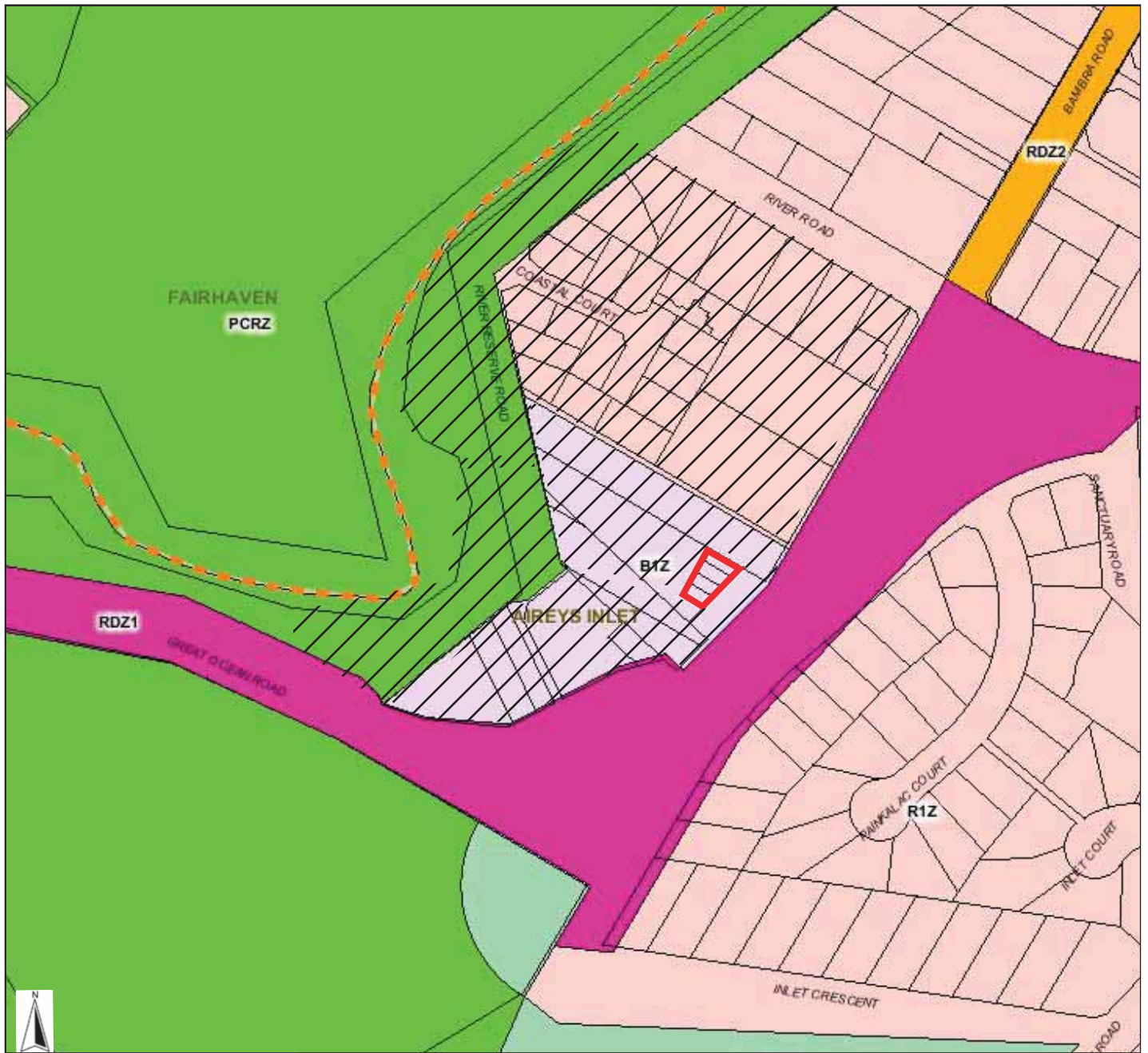
- Strip Shopping Centres (recommended)
- ..... Shopping Complexes (existing)
- Shopping Complexes (recommended)
- //// Discouraged Areas

### Strip Shopping Centres

Drawing No 133167 Date October 2007

Coomes Consulting Group Pty Ltd – A subsidiary of Downer EDI  
 Melbourne Shepparton Bendigo Albury Geelong

Engineering Surveying Planning Urban Design Landscape Architecture  
 Sustainability and Environment Agribusiness Project Management Strategic Consulting



- Strip Shopping Centres (recommended)
- ..... Shopping Complexes (existing)
- Shopping Complexes (recommended)
- //// Discouraged Areas

### Strip Shopping Centres

Drawing No 133167 Date October 2007

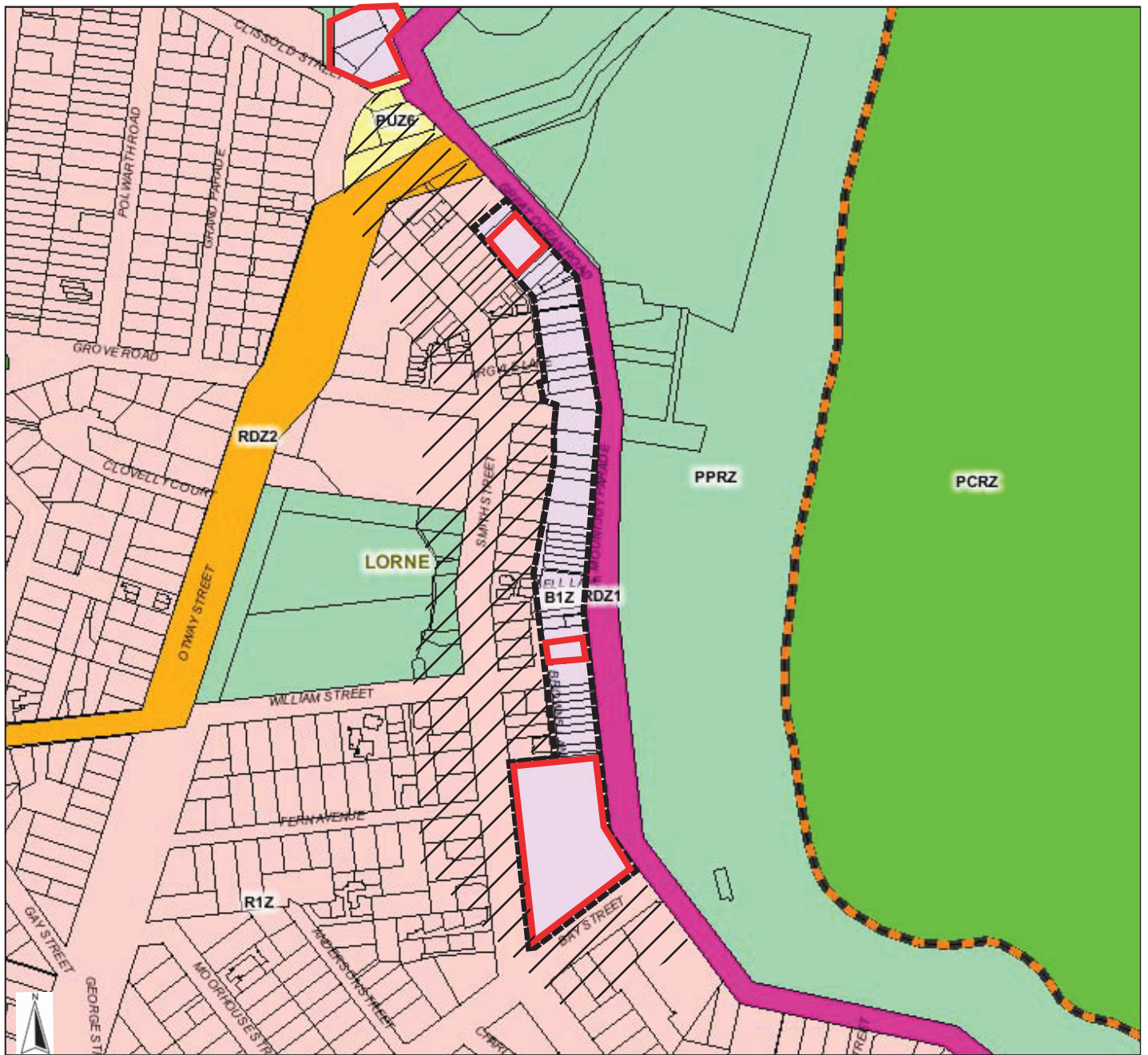
Coomes Consulting Group Pty Ltd – A subsidiary of Downer EDI  
Melbourne Shepparton Bendigo Albury Geelong

Engineering Surveying Planning Urban Design Landscape Architecture  
Sustainability and Environment Agribusiness Project Management Strategic Consulting

coomes consulting

River Reserve Road/ Great Ocean Road -Aireys Inlet





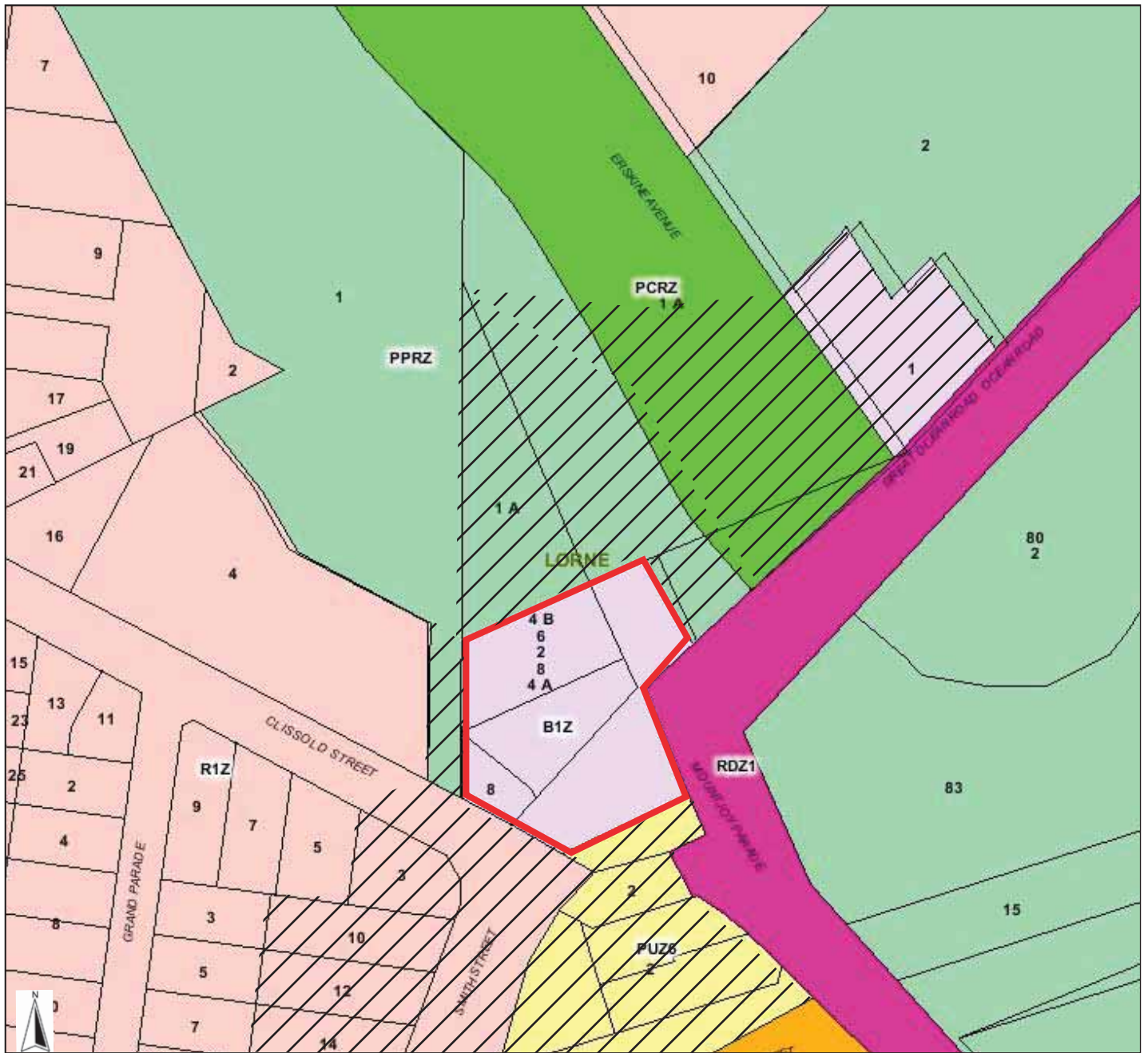
- Strip Shopping Centres (recommended)
- ..... Shopping Complexes (existing)
- Shopping Complexes (recommended)
- ////// Discouraged Areas

### Strip Shopping Centres

Drawing No 133167 Date October 2007

Coomes Consulting Group Pty Ltd – A subsidiary of Downer EDI  
Melbourne Shepparton Bendigo Albury Geelong

Engineering Surveying Planning Urban Design Landscape Architecture  
Sustainability and Environment Agribusiness Project Management Strategic Consulting



- Strip Shopping Centres (recommended)
- Shopping Complexes (existing)
- Shopping Complexes (recommended)
- ▨▨▨▨▨ Discouraged Areas

### Strip Shopping Centres

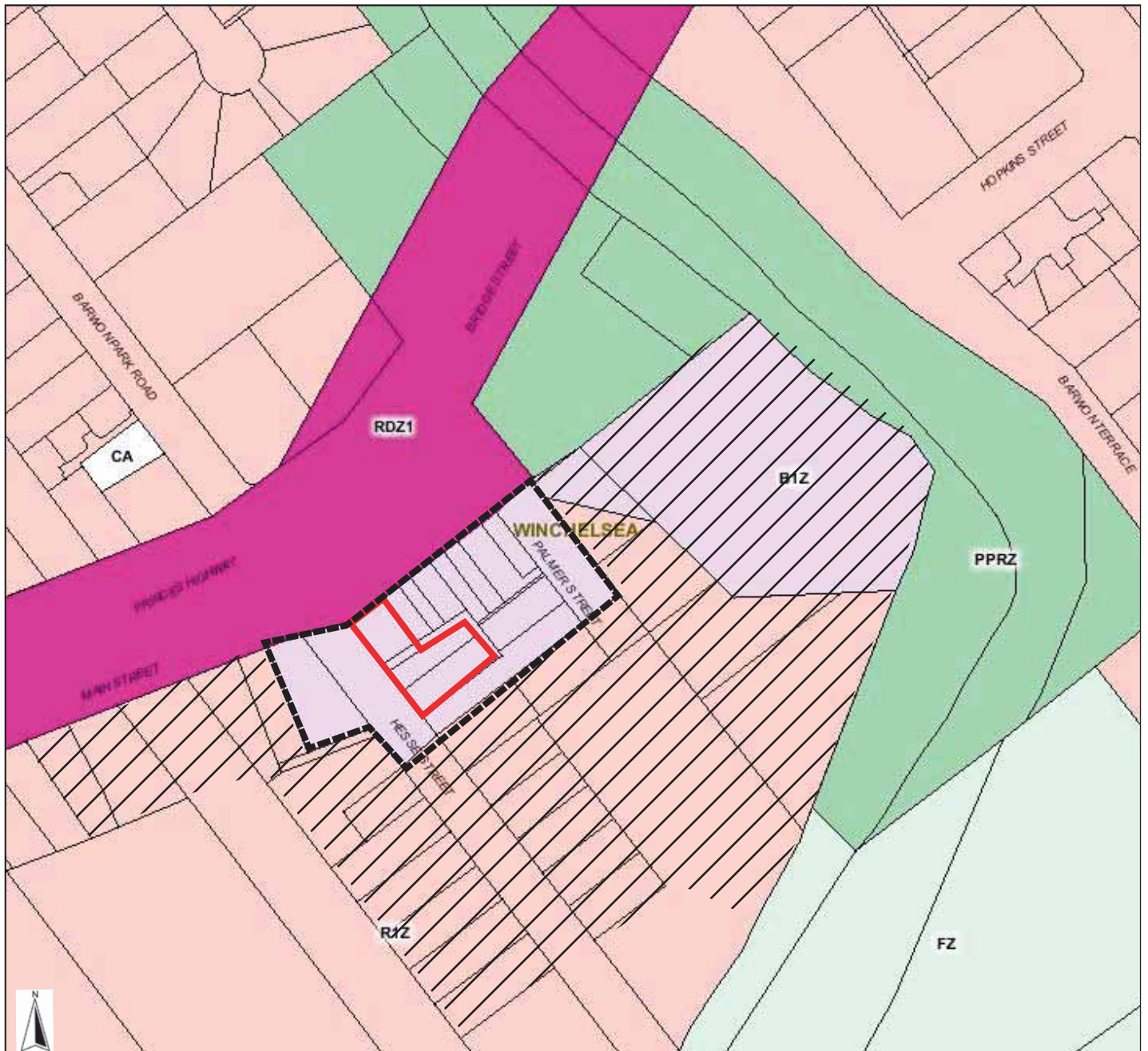
Drawing No 133167 Date October 2007

Coomes Consulting Group Pty Ltd – A subsidiary of Downer EDI  
 Melbourne Shepparton Bendigo Albury Geelong

Engineering Surveying Planning Urban Design Landscape Architecture  
 Sustainability and Environment Agribusiness Project Management Strategic Consulting

Mount Joy Road/Clissold Street-Lorne

coomes consulting



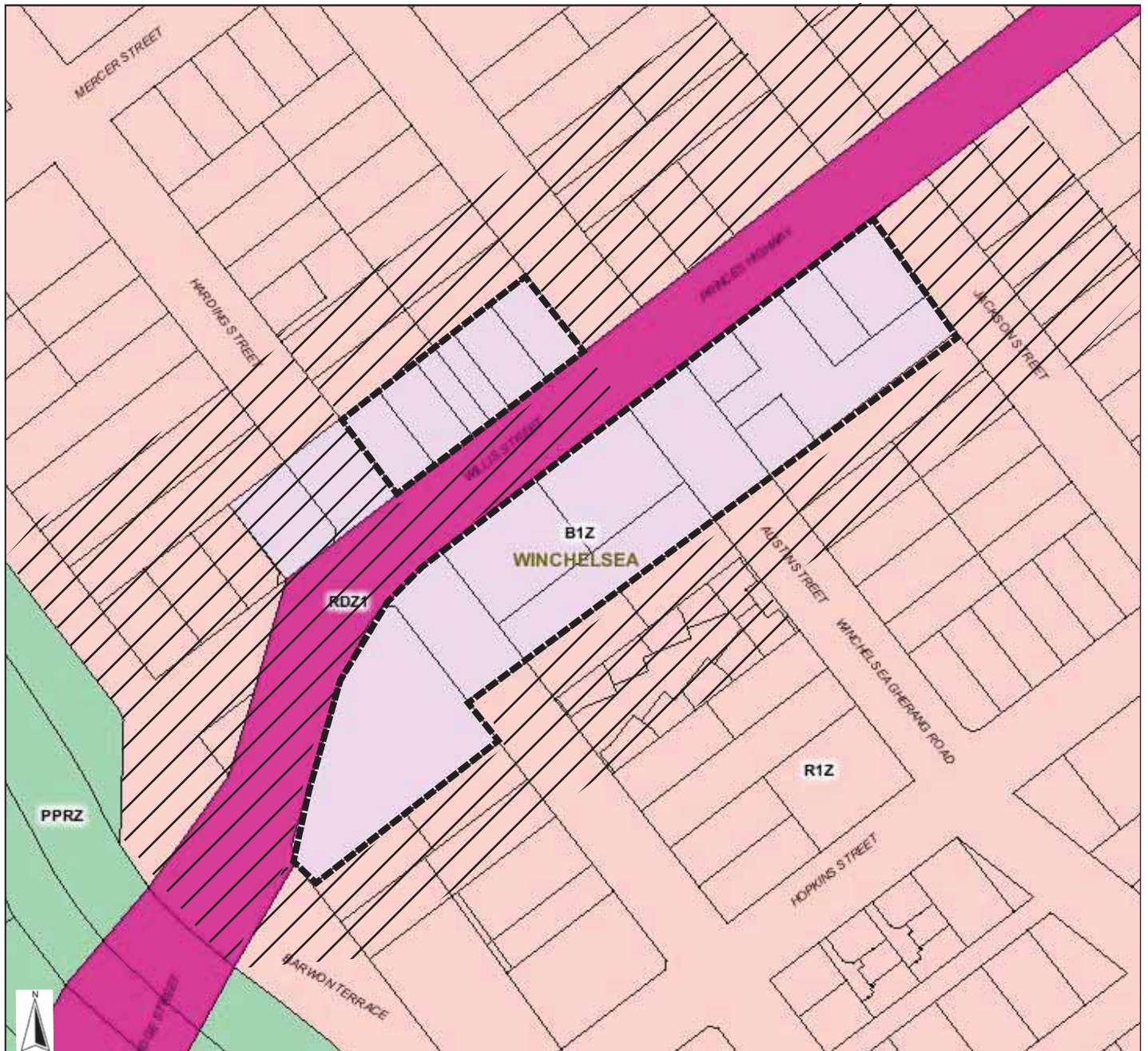
- Strip Shopping Centres (recommended)
- ..... Shopping Complexes (existing)
- Shopping Complexes (recommended)
- ////// Discouraged Areas

### Strip Shopping Centres

Drawing No 133167 Date October 2007

Coomes Consulting Group Pty Ltd – A subsidiary of Downer EDI  
 Melbourne Shepparton Bendigo Albury Geelong

Engineering Surveying Planning Urban Design Landscape Architecture  
 Sustainability and Environment Agribusiness Project Management Strategic Consulting



- Strip Shopping Centres (recommended)
- ..... Shopping Complexes (existing)
- Shopping Complexes (recommended)
- //// Discouraged Areas

### Strip Shopping Centres

Drawing No 133167 Date October 2007

Coomes Consulting Group Pty Ltd – A subsidiary of Downer EDI  
Melbourne Shepparton Bendigo Albury Geelong

Engineering Surveying Planning Urban Design Landscape Architecture  
Sustainability and Environment Agribusiness Project Management Strategic Consulting

coomes consulting

**18 Attachment 8 - Assessment Tool for evaluating net community benefit of gaming applications**

Points of Consideration	Data Sources	Comments/ Assessment (to be completed by Planning Officer)
Level of socio-economic disadvantage	<ul style="list-style-type: none"> <li>- SEIFA – see below</li> <li>- ABS Census data (<a href="http://www.abs.gov.au">www.abs.gov.au</a>)</li> <li>- Community Profile and Forecasts, Council website</li> <li>- ABS Census InfoMap on Housing Stress</li> <li>- DVC Indicators of Community Strength</li> <li>- Community Indicators Victoria (<a href="http://www.communityindicators.net.au">www.communityindicators.net.au</a>)</li> <li>- Jesuit Social Services, Tony Vinson. <i>Community Adversity and Resilience Report 2004</i></li> <li>- Council research department where relevant</li> <li>- Strategic Locational Framework Plan, Surf Coast Shire</li> </ul>	
SEIFA rating ABS (Relative socio-economic disadvantage)	<ul style="list-style-type: none"> <li>- ABS Website</li> <li>- Community Profile and Forecasts, Council website (forthcoming)</li> </ul>	
Transport (including major transport routes and access to public transport)	<ul style="list-style-type: none"> <li>- Transport planning department, Council</li> <li>- Department of Infrastructure</li> <li>- Melways etc</li> </ul>	
Non-gaming recreational and entertainment facilities available within a 4km radius	<ul style="list-style-type: none"> <li>- Council website (Council Services)</li> <li>- Recreation and Leisure Department, Council</li> <li>- Melways etc</li> <li>-</li> </ul>	
Economic Impact (rate of return to the community (sponsorship, donation), employment and estimated cost of revenue lost to the local community)	<ul style="list-style-type: none"> <li>- VCGR Research and Statistics (<a href="http://www.vcgr.vic.gov.au">www.vcgr.vic.gov.au</a>)</li> <li>- CBS reports on the VCGR website</li> <li>- ABS Census data</li> <li>- Applicant</li> </ul>	
EGM density and location of other gaming venues	<ul style="list-style-type: none"> <li>- VCGR Research and Statistics (<a href="http://www.vcgr.vic.gov.au">www.vcgr.vic.gov.au</a>)</li> <li>- Gaming Policy Framework, Coomes Consulting Group</li> </ul>	
Not located in a capped region	<ul style="list-style-type: none"> <li>- Department of Justice, Office of Gambling and Racing</li> </ul>	

Points of Consideration	Data Sources	Comments/ Assessment (to be completed by Planning Officer)
	<p><a href="http://www.justice.vic.gov.au">www.justice.vic.gov.au</a></p> <ul style="list-style-type: none"> <li>- <i>Regional Electronic Gaming Machine Caps Review Panel: Final Report</i>, Office of Gaming and Racing, November 2005</li> <li>- Gaming Policy, Coomes Consulting Group</li> </ul>	
Located proximate to, but not in the centre of local activity centres/urban centres	<ul style="list-style-type: none"> <li>- Gaming Policy Coomes Consulting Group</li> <li>- Planning Scheme</li> </ul>	
Not convenient to shops	<ul style="list-style-type: none"> <li>- Strip Shopping Centre Audit 2007</li> <li>- Consider location of surrounding land uses</li> <li>- Applicant</li> </ul>	
Location with regard to future growth areas	<ul style="list-style-type: none"> <li>- DSE Population projections</li> <li>- Community Forecasts, Id Consulting - Council website</li> <li>- Planning Scheme</li> <li>- Any relevant policy or document (for example, structure plans, development plans and growth strategies where applicable)</li> </ul>	
Considered a destination in its own right?	<ul style="list-style-type: none"> <li>- Applicant</li> <li>- Consider other services/ facilities within the venue</li> <li>- Consider proximity to other land uses around the venue</li> <li>- Consider proximity to transport/ accessibility of the proposal</li> </ul>	
Non-gaming services and facilities provided in the application	<ul style="list-style-type: none"> <li>- Applicant</li> </ul>	
Scale (size of venue and no. of EGMs etc)	<ul style="list-style-type: none"> <li>- Applicant</li> </ul>	
<b>Will the proposal provide net community benefit?</b>		