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**GAMING MACHINES ACT 2001**

**CLASS 1 LOCAL IMPACT ASSESSMENT**

**FOR AN INCREASE OF FIVE  
IN THE GAMING MACHINE THRESHOLD**

**AT  
THE CENTRAL HOTEL  
45-57 MAIN STREET  
BLACKTOWN**

**Prepared for  
the Corporate Licensee  
ACN 138 026 150 Pty Ltd  
a wholly-owned subsidiary of  
Winners Circle Group Pty Ltd  
(Receivers and Managers appointed)**

**July 2009  
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### Plans

- 099210/1**     Location of the Central Hotel
- 099210/2**     Aerial photograph

### Annexures:

- 1.     Certificate of Gaming Machine Entitlements
- 2.     Floor plans of the Central Hotel
- 3.     Approved Plan of Management
- 4.     Map showing the extent of the local community

Disclaimer: The data in this CIS has been gathered from various sources including the applicant and the records of Design Collaborative Pty Ltd. The opinions expressed are those of the author, GW Smith, a director of Design Collaborative Pty Ltd, who has worked as a planning consultant on the hotel for more than a decade.

## A. Executive Summary

A.1 The Central Hotel (*the Hotel*) stands at 45-57 Main Street, Blacktown, about 100 metres from the Blacktown Railway Station and Bus/Rail Interchange, in the heart of the Blacktown Town Centre.

A.2 The Hotel's gaming machine threshold is ten (10). The corporate licensee seeks to increase its gaming machine threshold by five (5).

A.3 A Local Impact Assessment (*LIA*) must be approved by the Casino, Liquor and Gaming Control Authority (*the Authority*) before the application to increase the gaming machine threshold can be approved. A Class 1 LIA is required – in this instance – because:-

- i. the increase sought is in the low range; and
- ii. the City of Blacktown is a Band 2 local government area.

A.4 If the application is granted, it is proposed that the five (5) remaining hardship gaming machines which were awarded to the Hotel in July 2002 but which are still "*unused*", be installed in the Hotel.

A.5 The corporate licensee ACN 138 026 150 Pty Ltd, a wholly-owned subsidiary of Winners Circle Group Pty Ltd (Receivers and Managers appointed). That company was placed under external administration on 4 March 2009. The Hotel continues to trade. It is not trading profitably.

A.6 The Hotel occupies the lower-ground and ground floors of a free-standing, four-storeyed building. The ground floor (accessible off Main Street) contains a bar with food and beverage service. The lower-ground floor (accessible off Warrick Lane) contains a sports bar and gaming room.

A.7 The approved trading hours of the Hotel are 10am to 3am, Monday to Saturday, and 8am to 10pm, Sunday. However, it usually closes about midnight, Monday to Thursday.

A.8 The ground floor is a place of public entertainment with a capacity of 110 persons. Currently, entertainment is limited to karaoke on Wednesday evenings, poker on Thursday evenings and occasional functions when a DJ or live band may perform. Prior to its recent severe financial difficulties, the entertainment provided at the Hotel included live performers and bands on more nights of the week.

A.9 The Hotel employs 10 people with another five employed by its food service-provider as well as security personnel.

A.10 The Hotel provides attractive, quality meals at ordinary meal-times and always has food available. Its clientele is dominated by shoppers (including families) around lunch-times and by white-collar workers in the evenings.

A.11 The Hotel's gaming machine operation is conducted in accord with all relevant legislative requirements. [Officers of the OLGR last inspected the Hotel on 24 February 2009.]

A.12 The Hotel serves a large local community with a population of over 100,000 which is varied in ethnicity, age, income and occupational status. The local community's SEIFA is about

the same as that of NSW as a whole. However, SEIFAs vary significantly from place-to-place in that community.

A.13 The principal benefit provided by the Hotel to the local community, as the larger of the two hotels in the Blacktown Town Centre, is as an attractive and convenient place for people in the Centre to eat, drink and socialise. Its strained financial circumstances, which have prevailed since it opened in 2005, have prevented the distribution of any significant financial largesse to the local community.

A.14 The increase in the gaming machine threshold sought would enable the Hotel to improve its trading performance as well as affording more opportunity for “*recreational players*”. Unless that performance improves, the continuing losses may lead to the closure of the Hotel. Its closure would be a significant dis-benefit to the local community and to the many from outside that community who visit the Town Centre. Consequently, the benefit provided to the local community and to others who frequent the Blacktown Town Centre by the granting of the application, would be the retention of the better of that Centre’s two small hotels where food, drink and entertainment are available to all adults regardless of their incomes, ethnicity, religion, political leanings or the like provided they meet the Hotel’s criteria for admission which are set out in its Plan of Management.

A.15 The principal dis-benefit to the local community arising from the increase in the gaming machine threshold is expected to arise from an increase in expenditure on gaming machines. Some claim that increase would be accompanied by, and substantially made-up of, an increase in the expenditures of those afflicted by problem gambling, thereby leading to an increase in the number of problem gamblers in the local community. Given that the Hotel is already a gaming venue and that there are clubs with very large numbers of gaming machines nearby, that hypothesis may not hold. It is equally possible that much of any increase in expenditure on gaming machines in the Hotel will be achieved by attracting expenditure from existing gaming venues in the Town Centre and in the City without any commensurate increase in the expenditure made by those suffering gambling problems. In such circumstances, it is not possible to quantify what – if any – dis-benefits the installation of another five machines in the Hotel may have for the local community.

A.16 In those circumstances, attempting to weigh the benefits and dis-benefits becomes a hypothetical exercise where value judgements must prevail. Logic suggests that there is likely to be greater community benefit in maintaining an excellent facility trading and meeting the needs of some of the local community than the dis-benefits that may arise from problem gambling in that community where there are already hundreds of gaming machines.

A.17 Information required to be provided by Regulations 35 and 37:-

- The internal floor space of the Hotel is 620m<sup>2</sup>.
- The application relates to an existing hotel so that paragraph (a) does not apply. Nevertheless, there is no school, place of public worship or hospital within 200 metres of the Hotel.
- The details of the benefits the threshold increase will provide are discussed in 6 below. Essentially, the increase will improve the financial viability of the Hotel, enabling it to continue to make available the services and facilities of a hotel in the large and growing Blacktown Town Centre.

- The Hotel provides all harm minimisation and responsible gambling measures required by the legislation. Details are set out in 5 below.

## **1. Introduction**

- 1.1 This document is a Local Impact Assessment Class 1 (*LIA*) prepared to accompany an application to the Casino, Liquor and Gaming Control Authority (*the Authority*) for an increase in the gaming machine threshold (*the threshold*) of the Central Hotel, 45-47 Main Street, Blacktown (*the Hotel*). The increase sought is five (5), from ten (10) to fifteen (15).
- 1.2 This LIA has been prepared on instructions from Winners Circle Group Pty Limited (Receivers and Managers appointed) (formerly Copatress Pty Limited), the corporate licensee of the Hotel. Winners Circle Group Pty Limited was placed in external administration on 4 March 2009. Peter Murray Walker and Morgan John Kelly of Ferrier Hodgson are the appointed Receivers and Managers of the company. On 24 July 2009, ACN 138 026 150 Pty Ltd, a wholly-owned subsidiary of Winners Circle Group Pty Limited (Receivers and Managers appointed) became the corporate licensee.
- 1.3 Under the Gaming Machines Act 2007 (*the Act*), an LIA is required to be approved by the Authority before an application to increase the gaming machine threshold can be approved. A Class 1 LIA is required in this instance because:-
- i. the increase sought is in the low range; and
  - ii. the City of Blacktown is a Band 2 local government area.
- 1.4 The Authority can only approve an application for an increase in the threshold of the Hotel if it approves an LIA. To be approved, the LIA must:
- i. comply with the requirements of the Act and the Gaming Machine Regulations 2008;
  - ii. demonstrate that gambling activities are conducted in a responsible manner; and
  - iii. demonstrate, in the case of a Class 1 LIA, that the increase in the threshold will provide a positive contribution towards the local community of the Hotel.

## **2. The History of the Hotel's Development**

- 2.1 Development consent for the Hotel was granted to Copatress Pty Ltd by the Land and Environment Court in 2000, some years after consent for a hotel in the premises was first sought. That consent permitted the hotel to keep up to 30 gaming machines.
- 2.2 The Licensing Court granted a conditional application for the removal of a hotelier's licence to the premises in March 2002. A condition of its grant was that the Hotel was not to keep more than 15 gaming machines during the first three years of its operation.
- 2.3 The Liquor Administration Board (*the Board*) awarded 15 hardship gaming machines to the proposed hotel in July 2002 subject to a condition that required the preparation and approval of a Social Impact Assessment Class 2 (*SIA2*) before they were installed. An *SIA2* seeking approval to keep 15 machines in the proposed hotel was lodged with the Board in July 2002 but was refused in July 2003. In the interim, the Board approved a

Class 1 SIA permitting four machines to be kept in the Hotel in April 2003. A second SIA2, seeking to keep, initially, 11 additional gaming machines and, ultimately, 26 additional machines, was lodged with the Board in August 2004. That second SIA2 was refused by the Board in August 2005. In August 2005, the Board also approved a second Class 1 SIA permitting another six machines to be kept in the Hotel. **Annexure 1** is a copy of the Certificate of Gaming Machine Entitlements issued by the Liquor Administration Board.

- 2.4 The Hotel opened for trade on 7 February, 2005 with Copatress Pty Ltd as business owner and corporate licensee.
- 2.5 There are currently 10 gaming machines installed in the Central Hotel. Its gaming machine threshold is ten (10). Five of the hardship gaming machines granted to the Hotel in 2002 remain “*unused*”.

### **3 The Hotel**

- 3.1 The Hotel occupies the lower ground and ground floors of a free-standing masonry building of four storeys which faces Main Street and Warrick Lane (the extension of Flushcombe Road) in the heart of the Blacktown Town Centre (*the Town Centre*). **Plans 099210/1** and **/2** shows its location. **Annexure 2** contains plans of the layout of each floor. The upper floors of the building are vacant.
- 3.2 The public area on the ground floor of the Hotel consists of a single space serviced by beverage and food bars. It can be entered from either Main Street or Warrick Lane. The lower ground floor contains a sports bar, with TAB, and a gaming room. Its access is off Warrick Lane. There is a kitchen and associated back-of-house facilities on the ground floor and amenities on each floor. The two floors are linked internally.
- 3.3 The Hotel occupies 620 square metres of internal floor space, ie, space inside its external walls.
- 3.4 The Hotel has approval to trade between 10am and 3am the following day, Monday to Saturday and 8am to 10pm on Sunday. The Hotel currently opens at 10am and closes at midnight, Monday to Thursday; at 3am, Friday and Saturday; and at 10pm, Sunday.
- 3.5 The Hotel’s daytime target market was white-collar workers, shoppers and others visiting the Blacktown Town Centre. Those people now constitute its principal daytime clientele. When the Blacktown City Council embraced policies aimed at enlivening the Town Centre later at night, the Hotel introduced entertainment and extended its trading hours. Its clientele later at night is, principally, what might best be termed “*mature young adults*”, ie, those in the 25-40 age bracket.
- 3.6 The Hotel provides good quality meals at lunch and dinner times and has food available at all times. The Hotel is popular at meal times with white-collar workers in the Town Centre as well as with shoppers. It attracts family groups around lunch-times and white-collar workers in the early evenings.
- 3.7 As a place of public entertainment, the ground floor of the Hotel has a capacity of 110 people. Entertainment was regularly provided in the evenings by a disc jockey and by

live entertainers. However, due to the corporate licensee's increasingly strained financial position, that entertainment has been reduced to karaoke on Wednesday evenings and poker on Thursday evenings. Occasionally, live performers and bands appear at the Hotel when functions are held in it.

- 3.8 The Hotel employs 10 people. Those who work in the kitchen and serve food (who number 5) are employed by another as are those engaged in providing security at the Hotel in accordance with its approved Plan of Management (**Annexure 4**).
- 3.9 The Hotel is surrounded by non-residential development consisting primarily of retail premises although it adjoins a TAB. The Main Western Railway Line runs just to the north of the Hotel with the Blacktown Railway Station and Bus Interchange about 100 metres away to the west. The nearest residential development lies north of the railway line, more than 100 metres from the Hotel. There is no place of public worship, school or hospital near the Hotel.
- 3.10 The Hotel was conceived when hotels were awarded gaming machines at no cost. It was constructed on the assumption that it would be able to keep, initially, 15 gaming machines and, by now, 30 machines. The capital cost of the fitting-out of the Hotel – in 2004 – amounted to some \$5million, reflecting that assumption.
- 3.11 Because the Hotel has been restricted to 10 gaming machines, its trading performance has not reached the level anticipated when it was conceived and constructed. That was a factor which contributed to Winners Circle Group Pty Ltd being placed under external administration. (Other hotels and hotel projects owned or proposed by that company also contributed to the company's failure.)

#### **4 The Local Community**

- 4.1 The Blacktown Town Centre is the principal business and shopping centre for the City of Blacktown, the State's largest local government area in terms of population (estimated to be in the order of 290,000 at 30 June 2008). The people who work in the Town Centre or visit it are drawn from a very wide area embracing the City and places beyond its boundary.
- 4.2 The issue of what might constitute the local community of the Hotel for the purposes of the Gaming Machines Act was considered in the determinations of the two SIA2s lodged with the Board. The Board, in its determination of the second SIA, stated:-

*“An earlier Social Impact Assessment submitted by Design Collaborative Pty Ltd (DC) on behalf of the hotel prior to its being ready to trade was refused on 18 July 2003. That Social Impact Assessment was reviewed in January 2003 by Ms A Ziller who did not raise concerns as to the SIA's identification of the local community. Whilst the Board did not find for the applicant in relation to that SIA, it did make a determination of the local community on the basis of material before it. DC submits, and ED (Elizabeth Delaney) agrees, that the local community as defined therein may appropriately be adopted as the local community for the purpose of the present application.”*

A plan of the area accepted by the Board as the local community forms **Annexure 4**. It may be broadly described as extending from the M4 in the south to the M7 in the north

and from the open spaces along Eastern Creek in the west to the open spaces along Greystanes Creek in the east. It is submitted that that area still constitutes the local community served by the Hotel.

- 4.3 In the 2001 Census, the local community housed a resident population of some 118,000. In the 2006 Census, the population was about 110,000, the fall reflecting the ageing of the area's population. New dwellings continue to be erected in the local community, mostly, in the form of apartments near the Town Centre and medium-density and detached housing towards its periphery.
- 4.4 The local community is essentially residential in character but includes substantial industrial areas north of the Town Centre; at Huntingwood and Arndell Park, in the south-west, and at Seven Hills, in the east. In addition to the Town Centre, it embraces the smaller business areas of Seven Hills, Prospect, Doonside, Marayong, Kings Langley and Lalor Park. The Town Centre is the hub of the local public transport system. The Hotel is very close to the focal point of that system which is the Bus-Rail Interchange at the Railway Station.
- 4.5 The population living in the City and the local community is very diverse in ethnicity, age, income and occupational status. In broad terms, the City is an area where blue-collar workers dominate. However, its newly-settled northern suburbs – generally beyond the M7 and thus outside the local community – are dominated by higher-incomed, generally, white-collar workers. In the local community, Kings Langley and Woodcroft stand out as areas where high-incomed workers are well-represented. At the same time, there are pockets of public housing where significant proportions live on welfare payments. Nevertheless, in terms of SEIFA, the City ranks about at the level of NSW as a whole. Given that the south-western part of the City (the Mt Druitt district) is very disadvantaged and the northern suburbs, advantaged, the SEIFA of the local community is probably close to that of the City as a whole and thus of the State. That was the position at the 2001 Census but the data from the 2006 Census has not been processed to the level where it is possible to determine a single SEIFA for an area containing numerous census collection districts.

## **5 Harm Minimisation**

- 5.1 The Hotel's gaming machine operation is conducted in accordance with the relevant provisions of the legislation in that:-
- All staff involved in gaming-related duties hold responsible conduct of gambling certificates.
  - Copies of those certificates are kept on the premises and are available for inspection by relevant authorities.
  - The Hotel has an arrangement with the AHA (Centacare) in relation to the provision of problem gambling counselling.
  - The Hotel is a member of the AHA self-exclusion scheme. [It has been notified of 28 persons who have self-excluded themselves from the Hotel. However, no person has registered for self-exclusion at the Hotel.]
  - Staff have training on self-exclusion and referral to counselling services.



- All signs required to be displayed are displayed. [OLGR officers audited the Hotel on 24 February 2009 and found it to be compliant.]
- Pamphlets warning about problem gambling and advising of the availability of counselling services for problem gambling and self-exclusion are displayed in a number of languages in the gaming room.
- The Hotel's ATM is not located in its gaming room.
- The Hotel does not have a specific house policy on gaming but staff are not allowed to play on its poker machines.
- The presence of poker machines in the Hotel is not advertised in any way outside of it.
- There is a visible clock in the gaming room.
- There is a limit of \$2,000 on cash payments for winnings.
- The Hotel does not cash cheques.

If the keeping of the five additional machines is approved, the Hotel's gaming machine operation would continue in the same manner or as required by the Authority.

## **6 Benefits**

- 6.1 It is generally accepted that the majority of people who play gaming machines do so for enjoyment and suffer no ill-effects from doing so. In busy periods, the Hotel's existing machines cannot cope with the demand to play them. Having the additional machines would increase the Hotel's ability to cope with the demand to play at peak times. That would be a benefit to the recreational players in the local community.
- 6.2 Due to the company's tight financial circumstances, the Hotel has not been able to contribute significantly from the takings of its gaming machines, to local welfare, sporting or community organisations. From time-to-time, small donations have been made to such organisations.
- 6.3 It is doubtful that the Hotel will be able to make any sizeable donations to such organisations even if this LIA1 is approved since the income from the additional machines sought may be fully absorbed in keeping the Hotel open. Without that income, it is likely that the Hotel will have to cease to trade or the standard of service it provides will have to be reduced.
- 6.4 The Hotel provides a small, centrally-located facility, open to all who meet the usual requirements for entry to a hotel, which is light and airy although air-conditioned (a significant factor in both summer and winter in Blacktown) where patrons can partake of liquor or food or gamble in modern, comfortable and safe surroundings. On some evenings, entertainment is provided.
- 6.5 The existence of the Hotel in the heart of the Town Centre, in itself, provides a benefit for the public which utilises that Centre. Its presence as a late night trading business with entertainment is in line with the Blacktown City Council's desire for the Town Centre to be a vital, lively place after business hours.

- 6.6 The Hotel is required to abide by a comprehensive Plan of Management requiring security personnel to patrol a significant part of the Town Centre every night until the Hotel closes. The presence of those security personnel assists in the maintenance of public order in an area which once had a poor reputation due to the patrons of other licensed premises which had operated in the area prior to its establishment. Its presence thereby provides a public benefit.
- 6.7 There is only one other hotel in that Centre – the Town Tavern – which is operated by Winners Circle (Maroubra Bay) Pty Ltd, an entity connected to Winners Circle Group Pty Limited. (Winners Circle (Maroubra Bay) Pty Limited is also under external administration with Peter Murray Walker and Morgan John Kelly appointed as Receivers and Managers.) Winners Circle (Maroubra Bay) Pty Ltd expended considerable sums modernising the Town Tavern which is a smaller venue than the Central Hotel. It has 16 gaming machines. The Town Tavern cannot expand as it occupies a tenancy, incapable of expansion, in the Westpoint Shopping Centre. Similarly, it cannot increase its threshold. The Receivers and Managers have now placed the Town Tavern on the market.
- 6.8 There are two major registered clubs in the Town Centre – The Blacktown Workers and the Blacktown RSL – each of which has literally hundreds of gaming machines. The Hotel provides an alternative social meeting place which is superior to most – if not all – of the public areas in those clubs in terms of comfort and ambience, providing a sense of intimacy, being much smaller in scale and offering greater convenience and being centrally positioned in the Town Centre whereas the clubs are located on its periphery. It also has the advantages of providing a place that those who are not members of the clubs can patronise.
- 6.9 The Receivers and Managers continue to trade the Hotel as before whilst assessing the ongoing viability of such trading and options for its future. Since the Receivers and Managers were appointed, the Hotel has continued to incur trading losses. They may have no option but to cease trading at the Hotel. However, they hope to trade the Hotel until such time as a suitable purchaser can be found and the business sold as a going concern.
- 6.10 If the Hotel is closed, the public using the Town Centre, the majority of whom probably live in the local community, would suffer the loss of what is one of the better hotels of its kind in Western Sydney and one of only two small hotels in the Town Centre – the focal point of their community.
- 6.11 If the LIA 1 is approved and the Hotel utilises the unused hardship gaming machines attached to its licence, the number of machines kept in the Hotel could be increased for minimal outlay. The additional machines should improve the viability of the Hotel, enabling it to remain open while maintaining or, possibly, improving its present level of service. The specific reason why the Board granted the then-proposed hotel the hardship machines in 2002 was to provide it with the wherewithal to trade successfully. If it remains open, the Hotel would continue to provide a benefit to the public in the Town Centre and the local community.

## 7 Potential Dis-benefits

- 7.1 It can be assumed that the approval of this LIA1 will lead to an increase in the number of gaming machines in the Hotel from 10 to 15.
- 7.2 The former Board asserted that, in its experience, where the number of machines kept in a venue increased, the total takings from machines in the Hotel also increased, usually by an amount in the order of the number of additional machines multiplied by the average takings of machines in the venue. Whether or not that relationship holds true in areas where there are numerous venues and large numbers of machines is not known. Moreover, the effect of very depressed economic conditions on gaming takings is also not known.
- 7.3 One school of thought contends that a substantial proportion of any additional gaming machine takings will be provided by persons who have gambling problems which, if sufficiently serious, render those persons problem gamblers. Another school of thought, relying on the results of numerous Australian and international prevalence studies, contends that problem gamblers make up a small proportion of the population (*circa* 1% of the total adult population) and that that proportion is relatively insensitive to changes in the availability of gambling opportunities. To date, there has been insufficient research undertaken to verify the contention of either school of thought.
- 7.4 Assuming – as a worst case scenario – the first school of thought’s approach, it would follow that a 50% increase in the number of machines in the Hotel would result in a similar increase in the amount spent on gaming machines in the Hotel by problem gamblers.<sup>1</sup> If that is the case, that increased expenditure is likely to come, in part, from people who are already problem gamblers and, in part, from people who may slide into that condition as a result of the additional machines. Logic suggests that the latter would be very few in number because the Hotel is already a gaming venue. It is more likely that most of any additional expenditure from problem gamblers spent on the additional machines would come from existing problem gamblers who patronise the Hotel’s existing machines or from existing problem gamblers who presently patronise other venues but who may switch their patronage to the Hotel because it has additional machines.
- 7.5 The management of the Hotel is not aware of any problem gamblers presently patronising the Hotel, eg, no patron has sought self-exclusion at the Hotel and none is known to have sought assistance in arranging to visit a problem gambling counsellor. [The 28 people who are presently self-excluded from the Hotel’s gaming room are on the AHA’s district list which is circulated to all hotels in the area, those people having self-excluded at other hotels in that area.] No-one knows how many, if any, problem gamblers presently patronise the Hotel’s gaming machines. Similarly, no-one knows if any of those succumbed to problem gambling due to the presence of machines in the Hotel
- 7.6 It is accepted that problem gambling imposes serious burdens on those afflicted and that those problems flow on to their families and close associates and to the community as a whole. The extents of those burdens are not clearly established, in part, because problem

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<sup>1</sup> Data on the Hotel’s takings from its gaming machines is not included in this LIA because it is confidential commercially. It is available to the Authority from its own sources.

gambling is often associated with other problems such as depression, anxiety, unhappiness and/or addiction to drugs as well as impoverishment and lower levels of education. The situation is further complicated by the lack of any clear guidelines for diagnosing a person as a problem gambler, mainly, because the descent into problem gambling is usually gradual, is manifested at different “levels” by different people and may not be permanent as people can drift in and out of that condition over a period.

7.7 It is submitted that, in these circumstances of uncertainty and ignorance, about all that can be said is that the installation of additional gaming machines in the Hotel has the potential to create an increase in the number of people who suffer from gambling problems in the local community. Given the plethora of gaming machines in the Town Centre, the local community and the City, it seems improbable that five machines could create many additional problem gamblers.

## **8 Weighing the benefits and dis-benefits**

8.1 The potential benefits arise from the increased takings of gaming machines assisting the Hotel to continue trading while providing the types and levels of service it has provided (and is still attempting to provide) to the local community. Those benefits are intangible and cannot be quantified but they nevertheless exist (otherwise hotels would not be such an integral part of our society).

8.2 The dis-benefits arise from any potential increase in problem gambling which places burdens on individuals, families, communities and society as a whole. It is uncertain whether or not that potential will be realised or, if it is realised, what the magnitude of the burden it may create, might be. Thus the dis-benefits are also intangible and cannot be quantified. They may or may not arise.

8.3 Even taking a worst-case scenario in terms of problem gambling, the dis-benefits appear likely to be small. Hopefully, through public education and like campaigns and various measures such as those already imposed in gaming venues, eg, notices, clocks and the like, the potential for the additional machines to create problem gamblers will decrease in future.

8.4 By contrast, the demand for hotel facilities – including gaming – in the Town Centre is likely to grow due to State and Council policies such as the encouragement of higher-density housing around it, its emergence as an increasingly-important business centre in Western Sydney and the desire to make it a lively place in the evening.

8.5 In those circumstances, when the potential benefits and dis-benefits are weighed, the former appear to be the greater. In other words, the benefits of keeping the Hotel trading appear to outweigh any dis-benefits arising from the installation of an additional five gaming machines.

8.6 Consequently, it can reasonably be concluded that the increase in the threshold would provide a positive contribution towards the local community of the Hotel.