

1. Community welfare

Claim: *additional EGMs will provide benefit to the Proposed Club's local community* (LIA p. 5)

Research^{1,2,3} shows that Australians perceive the use and proliferation of poker machines to be particularly harmful and that there is a need for effective action to reduce the harm.

This perception was borne out by the 2010 report of a Productivity Commission enquiry⁴ into gambling which highlighted the significant social cost of gambling, noting that

- the potential for significant harm from some types of gambling is what distinguishes it from most other enjoyable recreational activities. One large-scale survey found that three quarters of Australian adults thought that gambling did more harm than good for the community, a view unlikely to apply to most other legal recreational pursuits;
- for 'problem gamblers' the harm is more intense and damaging to themselves, their families and other connected community members;
- the problems experienced by gamblers are as much a consequence of the technology of the games, their accessibility and the nature and conduct of venues, as they are a consequence of the traits of the gamblers themselves;
- poker machines present a particular risk with problem gamblers accounting for around 40 per cent of electronic gaming machine spending;
- people playing gaming machines face much greater risks than other gamblers;
- despite their community focus clubs offering gambling also derive the majority of their revenue from gaming machines and that some community clubs can be more dependent on gambling than casinos;
- clubs wishing to act ethically have muted incentives to address the problems faced by their customers, as this could mean significantly lower profits;
- social contributions by clubs tend to be narrowly focussed on sports activities and subsidised benefits for club members;
- that lower taxes and other concessions that facilitate social contributions made by clubs have potential to distort social investment throughout the economy. Concessional treatment of clubs means less revenue for governments and higher taxes for taxpayers generally. Governments have the capacity to allocate funds to roads, rail, healthcare and many other social benefits through the usual budgetary process, and to be politically accountable;

¹ McAllister I (2014) *Public opinion towards gambling and gambling regulation in Australia* International Gambling Studies Vol. 14, Iss. 1, 2014

² Mond J, Davidson T and McAllister I (July 2011) *Public Opinion on Gambling* Australian National Institute for Public Policy, Australian National University Available at <https://lyceum.anu.edu.au/wp-content/blogs/3/uploads/ANUpoll-%20Gambling1.pdf>

³ Samantha L, Thomas S et al (2017) *Public attitudes towards gambling product harm and harm reduction strategies: an online study of 16–88 year olds in Victoria, Australia* Harm Reduction Journal 14:49 Available at <https://harmreductionjournal.biomedcentral.com/track/pdf/10.1186/s12954-017-0173-y?site=harmreductionjournal.biomedcentral.com>

⁴ Productivity Commission (2010) *Productivity Commission Inquiry Report Gambling* Volume 1 No. 50 26 February 2010. Australian Government. Available at <https://www.pc.gov.au/inquiries/completed/gambling-2009>

- the large tax concessions on gaming revenue enjoyed by clubs in some jurisdictions (notably New South Wales) cannot be justified on the basis of realised community benefits;
- the value of social contributions to the broader community is a small share of the value of the tax concessions provided by the broader community;
- decisions about the allocation of gaming machine surpluses sometimes lack appropriate governance and transparency arrangements;
- the claim that revenue from poker machines in clubs helps to stimulate volunteering and community participation in sport is not supported by comparisons across jurisdictions with differing levels of club dependence on gaming revenue;
- that the claim of employment in clubs providing a significant community benefit is not correct in the net sense as employees have skills highly valued in the service sector as a whole and as clubs expand other venue opportunities contract. The longer-term employment effects of the gambling industry are likely negligible which is a finding supported by analysis commissioned by the industry itself.

The Productivity Commission report unquestionably debunked any argument that poker machines increase net employment in the service sector and that accessibility of poker machines can provide a net community benefit.

Research⁵ of Victorian data from 2005 to 2014 has shown that the density of EGMs in a postcode is connected to increased risk of domestic violence (DV) as follows:

- DV is associated with EGM accessibility.
- Areas with no EGMs have 20% fewer family incidents than those with 75 EGMs/10,000.
- Areas with no EGMs have 30% fewer DV assaults than those with 75 EGMs/10,000.

The study recommended that Regulators consider impacts on domestic violence when licensing EGMs.

Another 2016 Victorian study⁶ reviewed the literature on harm from gambling from a public health perspective. The results of this study indicated that in Victoria, although some of the 'burden of harm' is concentrated in problem gamblers, that at a population level the majority of harm is attributable to a wider cross-section of the community. Harm is at a substantial level in comparison to harm attributable to priority areas such as major depressive disorders and alcohol dependency, and greater than most common health conditions.

⁵ Markham, F., Doran, B., Young, M. (2016) *The relationship between electronic gaming machine accessibility and police-recorded domestic violence: A spatio-temporal analysis of 654 postcodes in Victoria, Australia, 2005–2014*, *Social Science & Medicine* (2016), doi: 10.1016/j.socscimed.2016.06.008. Abstract and article available at

<http://www.sciencedirect.com/science/article/pii/S0277953616302891?via%3Dihub>

⁶ Browne, M, Langham, E, Rawat, V, Greer, N, Li, E, Rose, J, Rockloff, M, Donaldson, P, Thorne, H, Goodwin, B, Bryden, G & Best, T (2016) *Assessing gambling-related harm in Victoria: a public health perspective*, Victorian Responsible Gambling Foundation, Melbourne. Available at https://www.responsiblegambling.vic.gov.au/__data/assets/pdf_file/0007/28465/Browne_assessing_gambling-related_harm_in_Vic_Apr_2016-REPLACEMENT2.pdf

An analysis⁷ of data from 42 studies from 1994 to 2015 commissioned by state and territory governments to measure the levels of gambling consumption and gambling-related harm found:

- Australia had more poker machines per person than any country in the world, excluding casino-tourism destinations like Macau and Monaco. It has nearly 200,000 machines – one for every 114 people.
- the losses by Australians on pokies outside of casinos dwarf those of any other comparable country. They are 2.4 times greater than those of our nearest rival, Italy. Australians lose three times more than New Zealanders, 4.1 times more than Canadians, 6.4 times more than the Irish, 7.5 times more than the British, and 9.8 times more than Americans.
- poker machine losses per adult in New South Wales have remained around 50% higher than the national average.
- the amount lost per poker machine gambler in pubs and clubs in NSW in 2015 was \$3,650 around \$70 per week, more than the average spent on electricity and gas.

The ILGA in its most recent report states that the Camden municipality already has 575 poker machines.

There is no reasonable argument or evidence that increasing the number of poker machines by 150 (26 %) in Camden is somehow socially beneficial. Poker machine gambling causes undeniable harm within many families and the greater community.

Claim: the Proposed Club will provide much needed services and that a variety of facilities and services, will not be available to the residents of Narellan and the Camden LGA if the Application is not granted (p. 7).

The LIA (p.7) states *The Proposed Premises will offer a variety of facilities and services, including but not limited to gymnasium, bars, lounge areas, dining facilities, balcony area, community and private function areas. If the Application is not granted, the above benefits will not be available to the residents of Narellan and the Camden LGA.*

The claim that poker machine revenue will provide needed community facilities that would otherwise not be available should be rejected.

Harrington Grove is near Narellan, which is an old area (founded in 1826) and is close to other old areas, especially Camden and Campbelltown and their surrounds, which have many restaurants and well established sporting and recreation facilities.

In particular, the Australian Good Food and Travel Guide⁸ alone lists 140 restaurants over 6 pages in the Macarthur area. Not all restaurants and hotel venues are listed and this number does not include fast food outlets which proliferate in Macarthur, milk bars, cafes, food courts in shopping malls, and the many eateries available in existing clubs such as Camden

⁷ Young M and Markham F (2017) *Three charts on: Australia's addiction to poker machines* The Conversation 27 June 2017 Available at <http://theconversation.com/three-charts-on-australias-addiction-to-poker-machines-78353>

⁸ Australian Good Food and Travel Guide available at <https://www.agfg.com.au/guide/nsw/sydney/the-campbelltownmacarthur-area/listings/6/>

Sports club, Camden RSL club, Camden Golf club, Country Club Gledswood Hills, Campbelltown RSL, Campbelltown Catholic club, Campbelltown Tennis club and Harrington Grove's Country clubs⁹ including its Michelia club¹⁰ being constructed to include swimming pool, tennis court, children's playground, gazebo, picnic tables, barbecues and a gym.



Camden Council has recently approved the nearby Old Milk Factory for an additional 6 restaurants. Arguably there are too many eating establishments with many currently not remaining viable over the medium term.

The LIA (p. 7) states Camden Council's projected annual population growth for the Narellan-Smeaton Grange area and the Camden LGA are 3.7% p.a. and 8.7% p.a. respectively for the period

2016-2021 and this equates to an increase of 41,692 people over the 5-year period. This level of projected population growth does not support an argument that the area needs the club facilities proposed, and is not an argument for a 26% increase in the number of poker machines.

Claim: *the Applicant has an arrangement with Camden Council in relation to Narellan Sports Hub¹¹ (p.8).*

The LIA (p. 8) states *The Applicant has been in talks with Camden Council to establish the Narellan Sports Hub - intended to be the major Camden Council sporting facilities. The Council expressed interest in investing approximately \$5 million, and the Applicant will pledge an appropriate level of capital investment as well as management expenses. The successful establishment of the Proposed Club, and the gaming threshold, will be pivotal towards the success of these projects.*

If this application is approved, based on detailed financial modelling we forecast that after 12 months of operations the Proposed Club's EGMs will generate sufficient revenue to provide ClubGRANTS of \$36,038. These grants will be directed to Priority Areas as identified by the Camden Council.

This argument is not understood.

The community is unaware of any interest or intention of Camden Council to invest \$5 million of public funds into the Proposed Club or any partnership or joint venture arrangement. Such an investment by Camden Council would require expert analysis and community acceptance that the investment was in the public interest. Given the facilities already available in Narellan and surrounds there would have to be strong evidence of a net

⁹ See <http://www.harringtongrove.com.au/harrington-grove-country-club>

¹⁰ See <http://www.harringtongrove.com.au/news/tags/tag/michelia-club>

¹¹ Camden Council Narellan Sports Hub Available at <https://www.camden.nsw.gov.au/major-developments/major-council-projects/narellan-sports-hub/>

benefit to the community. Such evidence is very unlikely to be forthcoming given the findings of research into the harm that poker machines undeniably create as covered above.

Whilst not categorically refuting the claim, without evidence being provided it is very difficult to see how a socially responsible Council could consider such an investment.

A possible implication is seemingly that Camden Council would invest \$5 million in the Proposed Club to receive ClubGrants. ClubGrants are based on recognition of the "not for profit" status of clubs, their concessionary tax treatment and that they *are owned by the community for the community, their sole purpose being to deliver a wide range of benefits to their members and the wider community*¹².

Clubs give back to the community at least partly because the community has lost money to the club through gambling, as emphasised by the reference to the importance of the *gaming threshold*.

Such an investment by Council to yield ClubGrants would of course be financially irresponsible as the annual percentage return would be less than 0.75%. Other types of investment would yield much more for building and maintaining sporting facilities and other community welfare purposes.

2. Regulatory Impediments

Claim: *Harrington Grove West is a "new development area" within 1 km of the Proposed Club (p.11)*

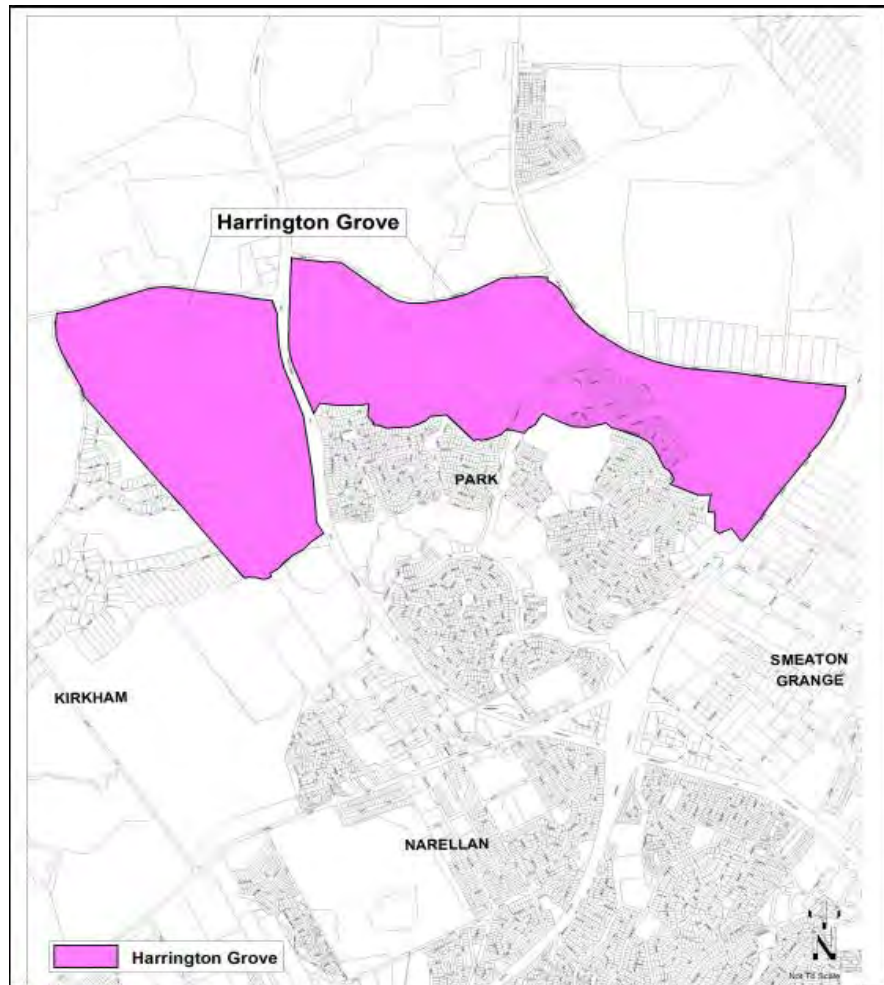
The LIA (p. 11-12) states *The LEP's accompanying maps (refer Annexure A) show that an urban release area has been established at Harrington Grove West, to the west of The Northern Road. The southern boundary of this area is less than one kilometre from the centre of the Proposed Club's premises. This, prima facie, satisfies the requirement set out in The Acts 37A (1) (a) and The Regulation cl. 40A (1) (a).*

We dispute that Harrington Grove West is a new development area and that a land release area has been established within 1 km of the Proposed Club.

Harrington Grove West is not regarded locally as a "new development area". In reality it is a part of the larger subdivision of Harrington Grove as shown in the map below from Camden's Development Control Plan (DCP) (Figure C29, p. C85)¹³ within the much larger Harrington Park area.

¹² ClubsNSW *About the club Industry* Available at <https://www.clubsnsw.com.au/our-industry/the-club-industry/about-the-club-industry>

¹³ See <https://www.camden.nsw.gov.au/assets/pdfs/Planning/Development-Control-Plan/DCP-Part-C.pdf>



The Harrington area including Harrington Grove is largely well developed and is well serviced with facilities including sporting facilities, restaurants and clubs as well as available facilities of nearby larger and long established centres of Narellan, Camden and Campbelltown.

The master plan of the Harrington Grove West sub-division¹⁴ is shown below.

¹⁴ Source at <http://masterplan.harringtongrove.com.au/>



Google

<http://masterplan.harringtongrove.com.au/>

15/01/2018

Currently under construction, the Michelia Club¹⁵, like its sister Magnolia club to the east, is a subsidiary venue of the Harrington Park Country Club. Marked in red on the above master plan it is to contain a full-sized tennis court, swimming pool, barbecue facilities, children's playground, picnic areas, gazebo communal seating areas and a gymnasium. These clubs are not licensed to provide poker machines.

As stated by the Developer: *Only 40 per cent of Harrington Grove will be developed; the balance has been designed for conservation*¹⁶. The unmarked area south of state heritage-listed Orielton and closest to the Proposed Club, is environmentally sensitive in terms of colonial heritage, remnant original vegetation and flooding. Orielton estate dates from a Governor Macquarie land grant in 1815. Its varied topographical features of ridges, knolls and slopes provide significant visual links with surrounding properties such as Harrington Park, the spire at St John's Church, Cobbitty village, The Northern Road and Studley Park, currently the site of Camden Golf Club. The visually prominent Orielton homestead and farm complex (c.1840), built above a flood plain, command sweeping views of Narellan¹⁷.

As shown in the plan below, the unmarked cream coloured area is closest to the Proposed Club. This area contains Precinct O situated around the unbuilt Precinct O road off Governor Drive. The unmarked area is between The Outlook off Kirkham Lane to the west, which the

¹⁵ See <http://www.harringtongrove.com.au/harrington-grove-country-club/magnolia-club-michelia-club>

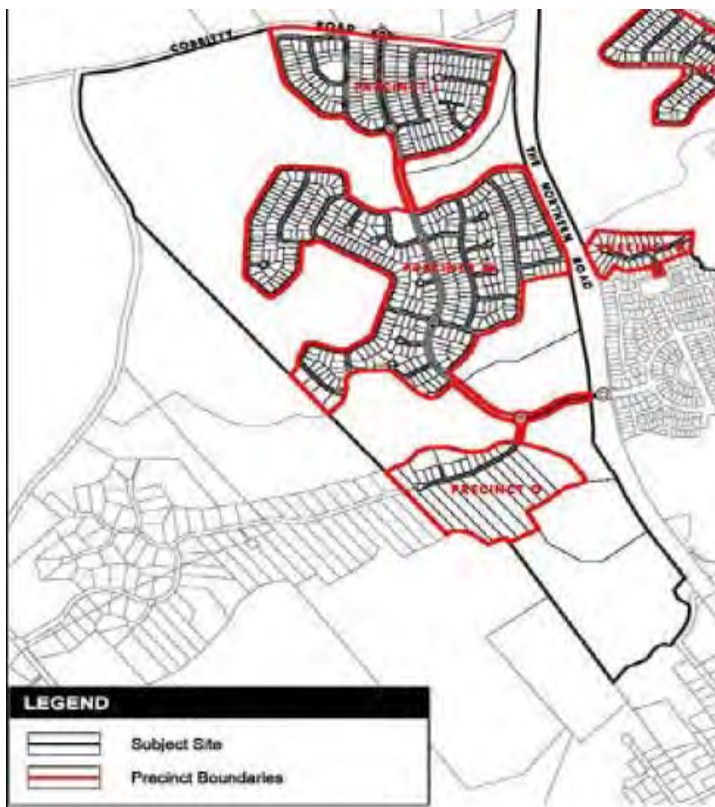
¹⁶ See <http://www.harringtongrove.com.au/harrington-estates/harrington-grove>

¹⁷ See <http://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=5052821>

unbuilt Precinct O road would connect to, and Harrington Park to the east, both more than 10 years old



Precinct O represents a small area of future potential infill development along the unbuilt road into the south of Harrington Grove West within the larger unmarked cream coloured area in the above map. The DCP (p. C87) states: *A small area located to the south and west of the Orielton Homestead will provide opportunities for housing in defined areas above the Narellan Creek flood line.*



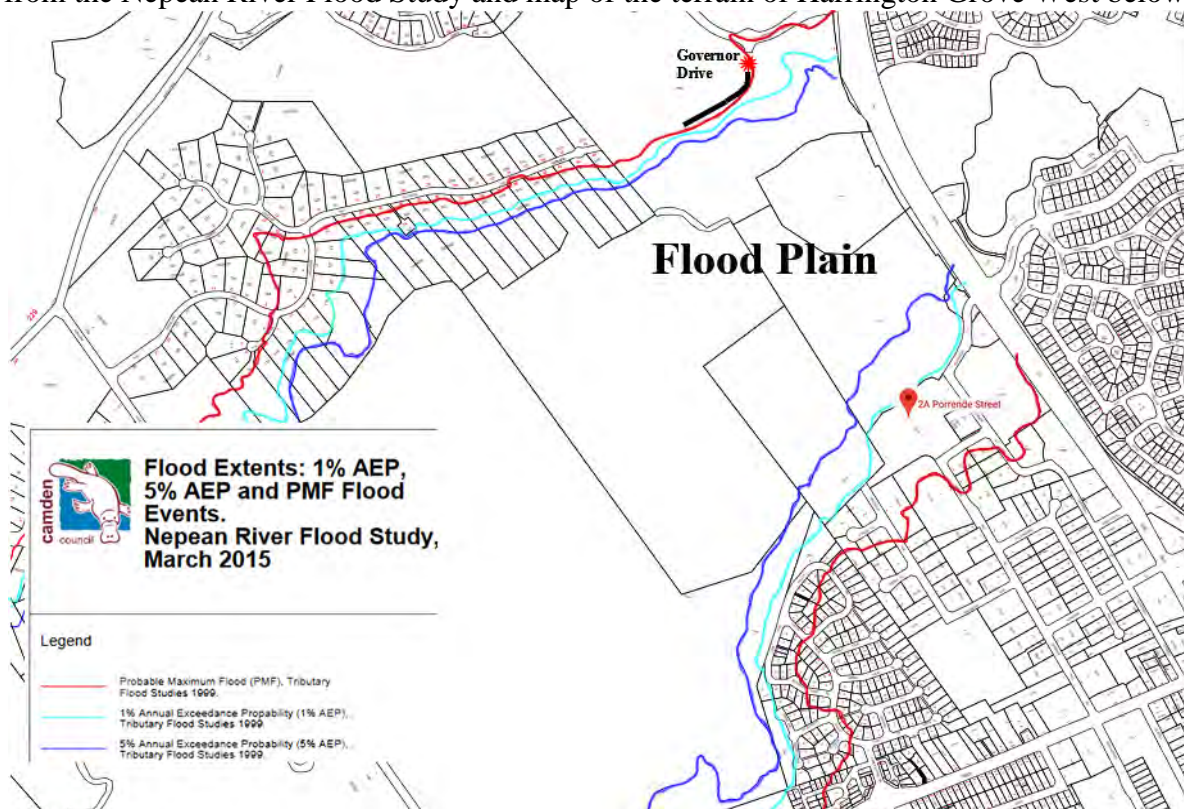
As shown in this diagram in the DCP (Figure C31, p. C90), the boundary of Precinct O is not the same as the boundary of land owned by the Developer. Land to the south of Precinct O is not and never will be a "new development area".

Measurement by trip meter from 2A Porrende St to the edge of the unbuilt road section is 1.4 km.

Precinct O is topographically difficult and with no road access is in any case not ready for any infill development as pictured below.



Although Camden Council¹⁸ does not at this time possess a detailed flood study of Narellan Creek, much of the land below Orierton is known to be flood affected as shown in the map from the Nepean River Flood Study and map of the terrain of Harrington Grove West below.



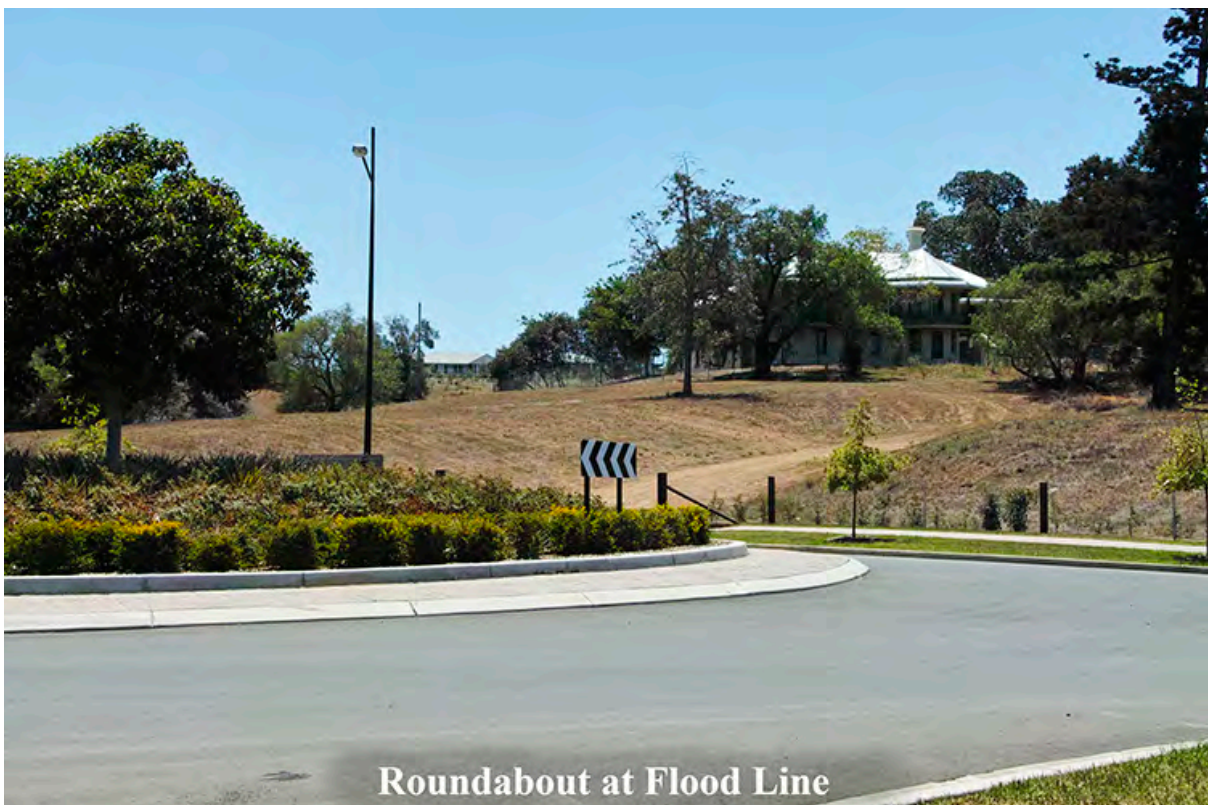
¹⁸ See <https://www.camden.nsw.gov.au/environment/flood-information/narellan-creek-catchment/>



As shown in the photos below access to the area south of Orielton including Precinct O is not available.



Potential roundabout access to the southern area at Orielton Homestead is at the flood line.



Potential roundabout access along Governor Drive (East West) has no entrance to the south and is posted with warnings.



As shown below future access is problematic and will require careful engineering.

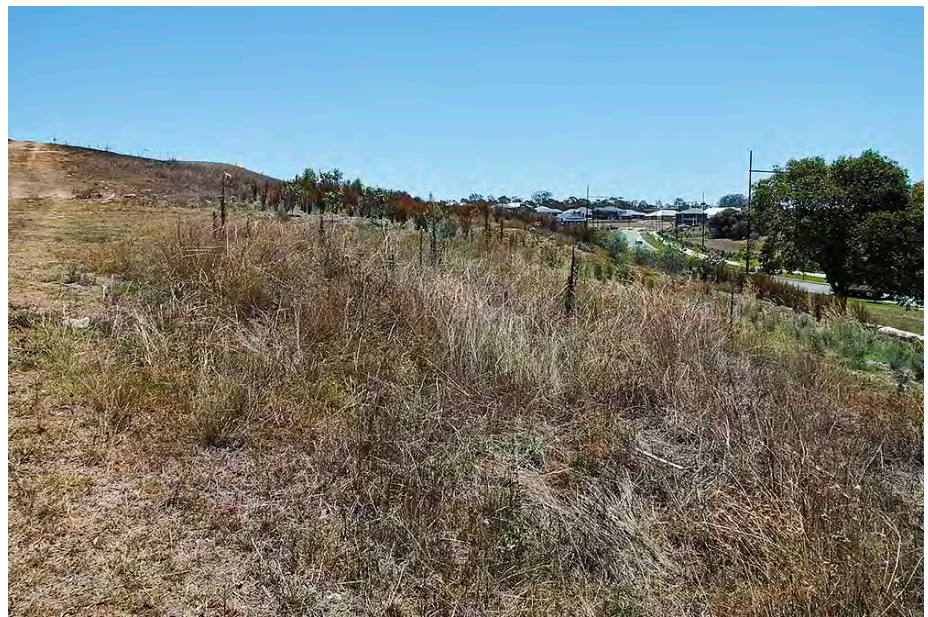


The Harrington Grove developer states *Soon Harrington Grove will be complete - a community celebrated for the past 25 years and nationally recognised for its outstanding community planning and design, community development and sustainability.*¹⁹ Dancerwood²⁰ further north and to the east of Northern Road is currently marketed as the last opportunity to purchase in Harrington Grove.



The Developer at the time of writing is not presenting Precinct O, the area around the unbuilt Precinct O road off Governor Drive and closest to the Proposed Club, with designated lots and no evidence of this land being on the market, released or to be released was found.

Logically, this is probably because topographically Precinct O and floodplain land within and to the south of Precinct O are difficult and costly to access and develop. Much land is flood prone or significantly sloped as shown below. Providing access and means of leaving in times of flood is likely to be difficult.



¹⁹ See

http://dancerwood.harringtongrove.com.au/?gclid=Cj0KCQiAkZHTBRcBARIsAMbXLhEkmxjfOMVWH_ZnNVQZAqltr3H3QowMujKnlnPDRwg2GgWWb3yPv5kaAgdkEALw_wcB

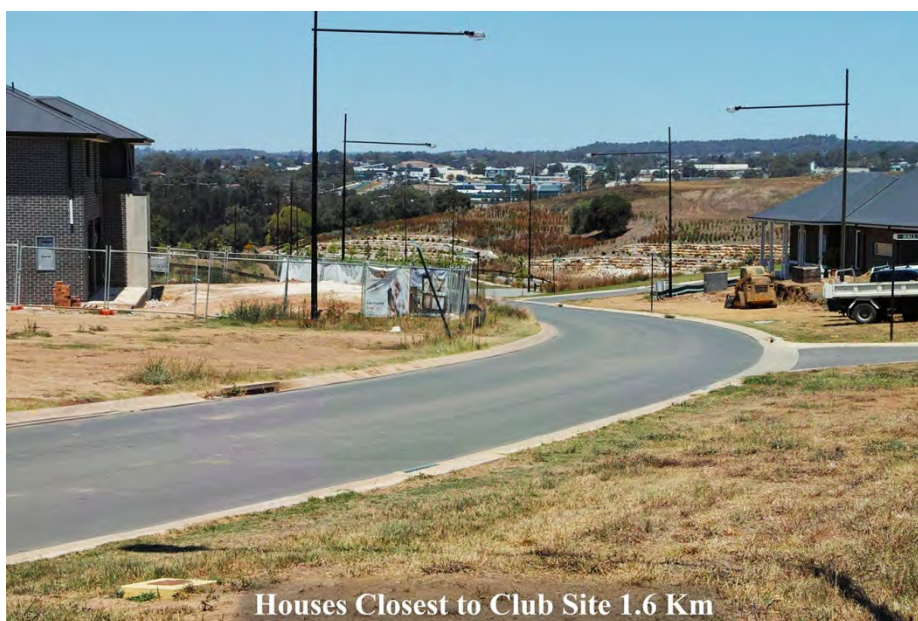
¹³ See

http://dancerwood.harringtongrove.com.au/?gclid=Cj0KCQiAv_HSBRCkARIsAGaSrCNdtEDXCDy6mVWQ1lSJ6yIObaAOyXpsU8cMA9lrPi7avT5lmLW4sMaAkjwEALw_wcB



The DCP for Precinct O (C9.14.15, p. C130)²¹ refers to creating lot sizes and does not demark building lots as the DCP does for less environmentally sensitive Precincts.

Whilst some lots may be released in the future on flood free higher ground, appropriately separated from flood areas and to minimise visual impact, the wording of the DCP indicates that this area is not yet planned as a new development area and that more environmental planning is required before any release of land can occur.



A search found no new lots are for sale in Harrington Grove West. The closest lots to the Proposed Club by our calculations are approximately 1.6 km distant.

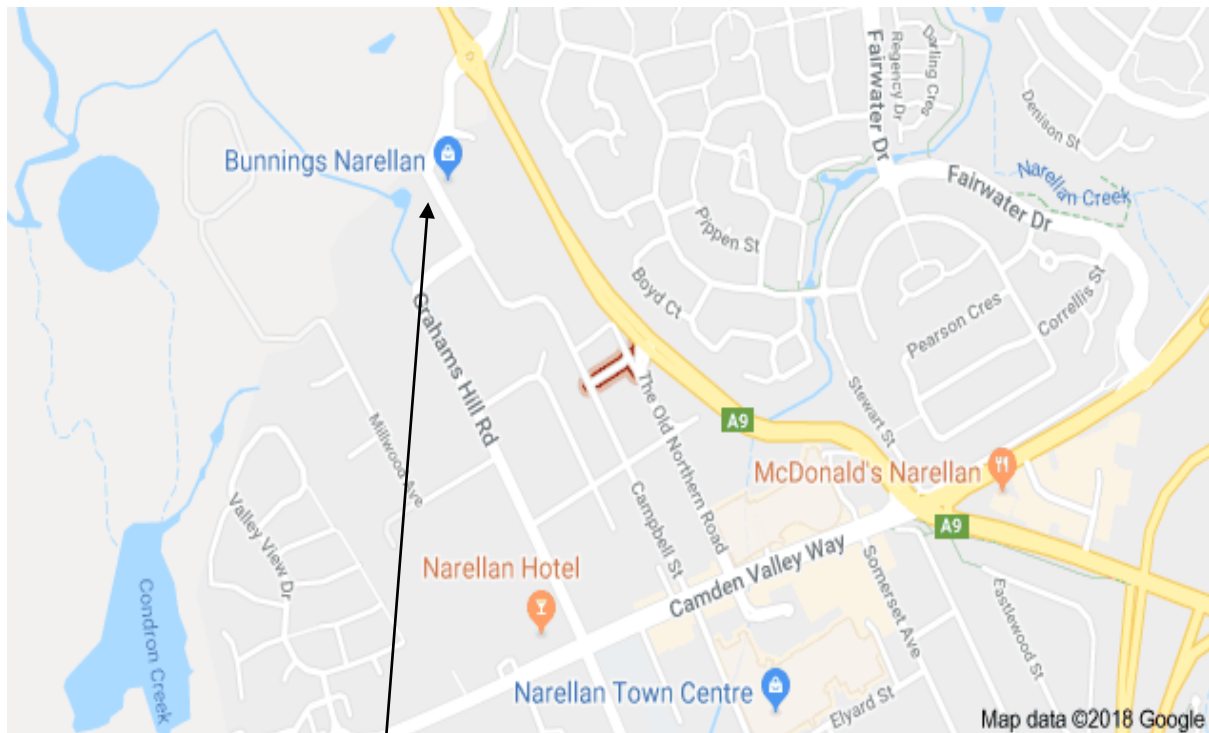
²¹See <https://www.camden.nsw.gov.au/assets/pdfs/Planning/Development-Control-Plan/DCP-Part-C.pdf>

Residents of Harrington Grove West who use the Sports Hub in the centre of the photograph below must travel more than 1 km by taking Northern Road or a more circuitous route. If and when unreleased Precinct O, the closest possible area of Harrington Grove West to the Proposed Club, becomes a new development area it may not be feasible to create the straight road link that the applicant claims would be of a distance less than the 1 km required to comply with the regulation.



Storm water travels north immediately behind the site of the Proposed Club, which also is occupied by a natural storm water retention pond for the Graham's Hill Industrial Area as shown in the aerial view below.

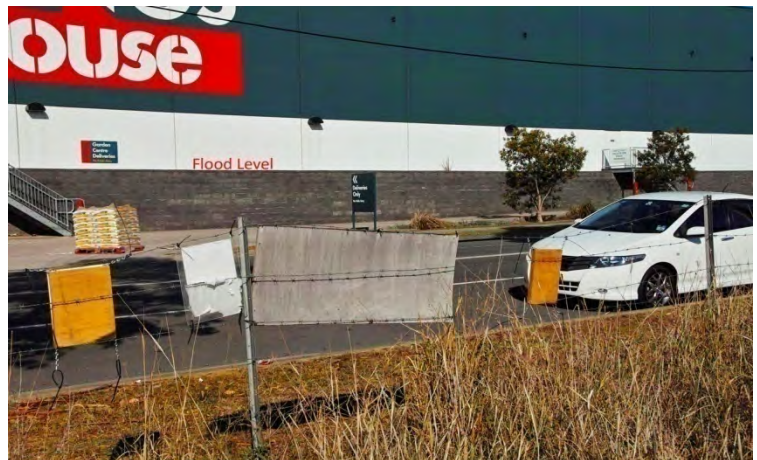




Proposed Club 2A Porrendo St

Narellan Creek is a large tributary to the Nepean River and the area between the Proposed Club and nearest housing of Harrington Grove West, largely flood area, is subject to natural drainage and storm water retention as is also apparent in the above Google Map.

Local research shows the potential flood level at nearby Bunnings.

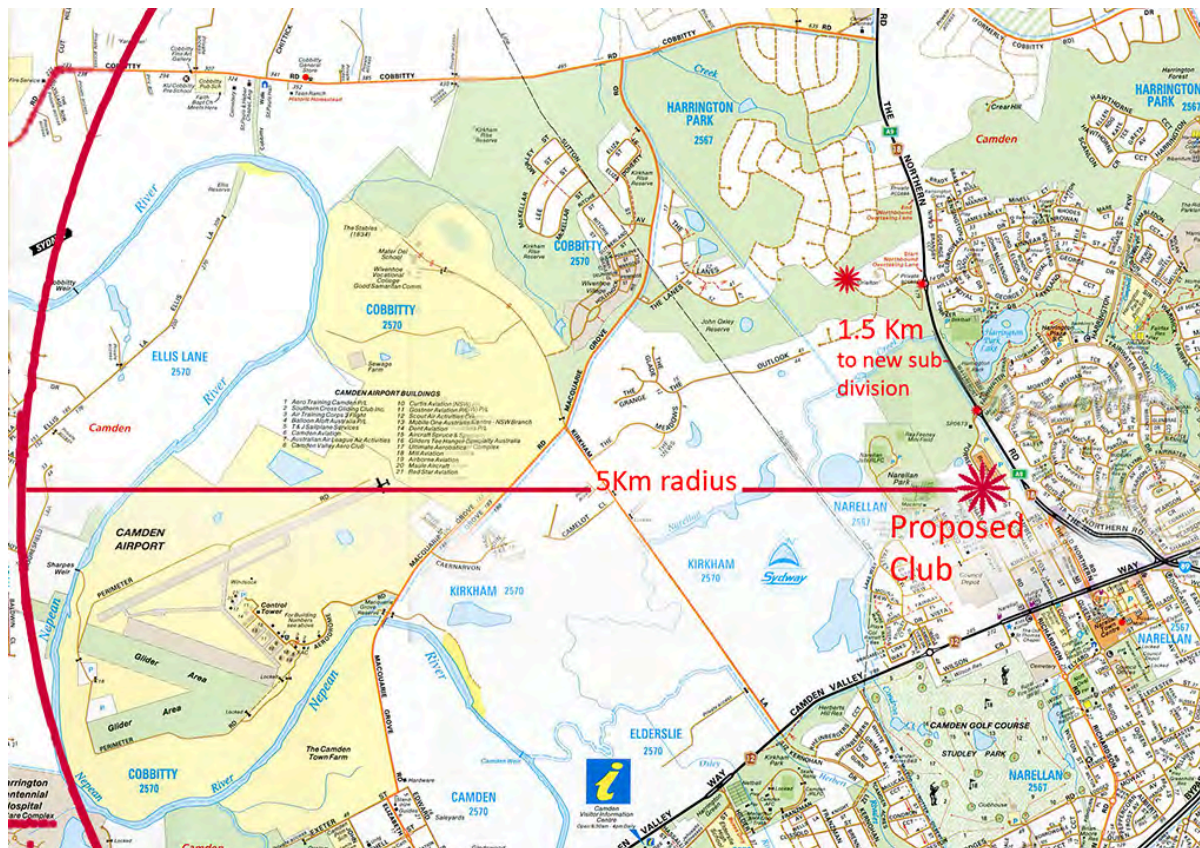


No proposal or evidence was found of any intention to link Precinct O directly south to the vicinity of the Proposed Club. Whilst the edge of Precinct O may arguably be within 1 km of the Proposed Club depending on how measured, there is negligible likelihood of any housing being so close.

We found it difficult to understand the distance calculation in the LIA's Figure 3 and in Annexure A maps which, as far as we can ascertain, do not clarify the distance being measured. However, the claimed distance of 825 metres would seem to be a straight line distance to a boundary relating to the area owned by the developer south of Orielson and/or Precinct O. There is no sign of development of Precinct O at this time so it cannot be logically considered a "new development area". In any case there is no means of travelling in

a direct line or by road from the proposed club to Precinct O or south of Precinct O. We consider the claimed distance to be meaningless and irrelevant to the application for 150 Poker Machines.

The map below shows the southern boundary of currently released Harrington Grove West lots to be 1.5 kms driving distance and approximately 1.3 kms as the crow flies from the Proposed Club at 2A Porrende Street. Similar distances of 1.6 kms for driving and 1.3 kms in a straight line were confirmed by Google Maps.



As explained above if the Precinct O road off Governor Drive is built and if Precinct O were to be developed it would be comparatively very costly with few lots in relation to its area due to its physical nature. No more than 27 or 28 houses can be built in Precinct O and these would be located in the high area to the north of the precinct.

Google Maps confirm that if Precinct O were to be released:

- the road distance, to the closest section of Precinct O along its unbuilt access road off Governor Drive is approximately 1.4 kms as shown in the map below. Perhaps relevantly Google Maps recognises Harrington Grove West as part of Harrington Park;
- the straight line distance as the crow flies to Precinct O outskirts may be measured as less than 1 km but distance to any future housing in a straight line would likely be further due to the topography and floodplain.

We believe there is no prima facie case as claimed under 40A of the *Amendment of Gaming Machines Regulation 2010* (LIA p. 11).

We disagree that Precinct O of Harrington Grove West is a genuine new development area.

We found no evidence that any new release areas are being marketed or foreshadowed in Harrington Grove West.

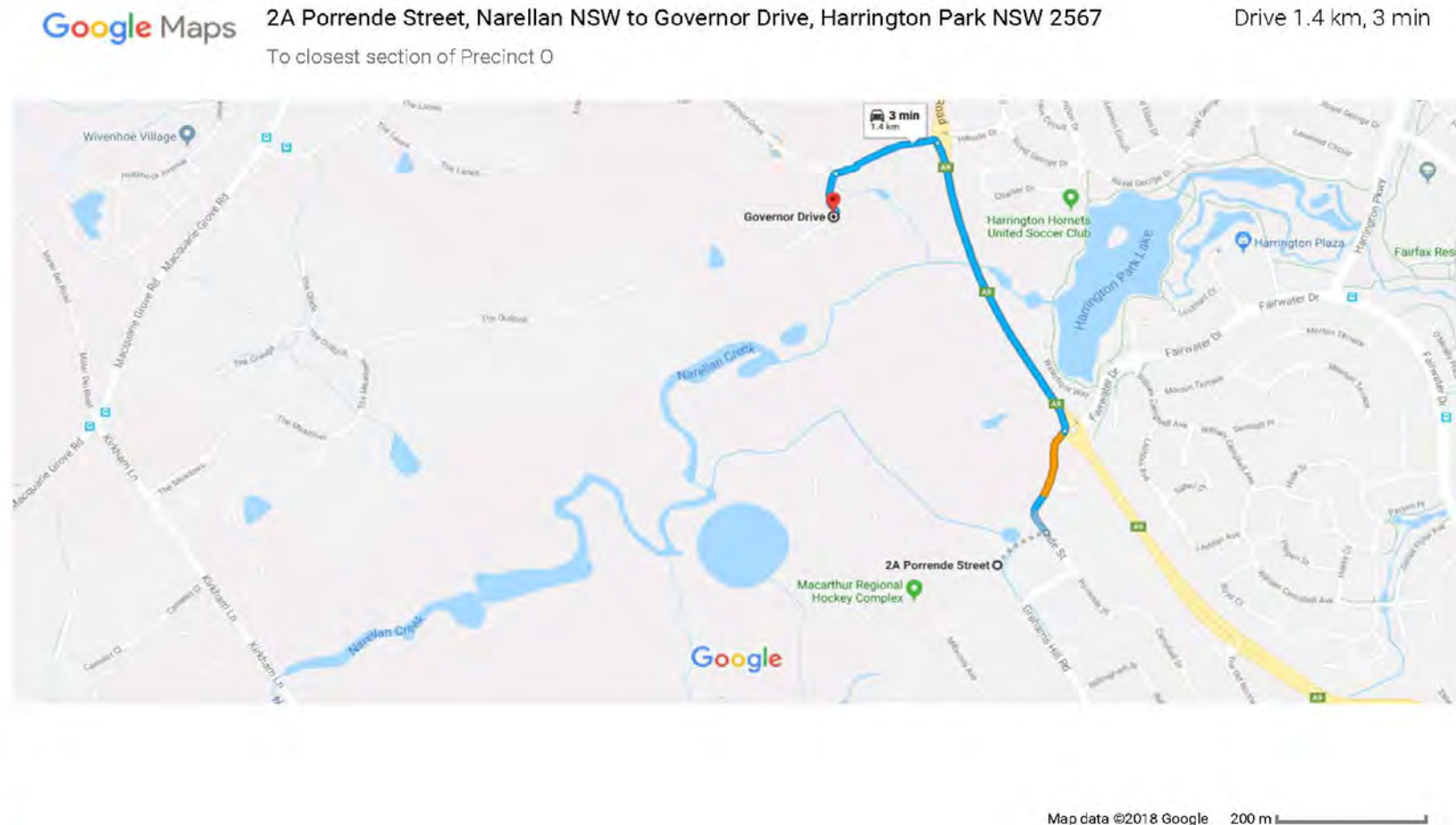
We disagree that a new development area of Harrington Grove West is within 1 kilometre of the Proposed Club.

We disagree that (if Precinct O were to be released) that Harrington Grove's areas closest to the Proposed Club could ever be built upon for residential purposes.

In any case, we cannot agree that the community as defined in the LIA, including Harrington Grove West, does not have full benefit of club-like facilities and services. As already explained the Harrington area has two clubs and one under construction at Harrington Grove West. Ready access to registered clubs themselves is significant as shown in the *Table of Distances* in the next section.

2A Porrende Street, Narellan NSW to Governor Drive, Harrington Park NSW 2567 - Google Maps

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<https://www.google.com.au/maps/dir/2A+Porrende+Street,+Narellan+NSW/-34.0275098,150.7238002/@-34.0304558,150.7214349,16z/...> 18/01/2018

Claim: *Harrington Grove West lacks the "full benefit of the services and facilities of the kind provided by clubs" and the adjacent area and the local community within 5 kilometres of the Proposed Club do not have the full benefit of the services and facilities of the kind provided by registered clubs (pp. 11, 12).*

The LIA makes various claims that the Proposed Club will provide necessary community services.

The LIA (p.12) states: *The Proposed Club will provide much needed services to its immediately surrounding suburbs as well as to suburbs further away to the North, West and East of the Proposed Club which are not currently serviced by registered clubs.*

From the community perspective whether a club is registered or not is irrelevant. The relevant issue is whether needed services are being adequately provided. It is not logical to argue that the Harrington clubs are not competitors to the Proposed Club as they do and will provide similar services to the residents of the Harrington area, including Harrington Grove West.

If the argument is actually that the Harrington clubs do not provide poker machine services then it has already been established beyond doubt that EGMs are socially detrimental.

The LIA (p. 12) claims: *There is only one other club within 5 kilometres of the Proposed Club, Camden Golf Club which is 2.6 kilometres to the south of the Proposed Club. However, it is a smaller club, with inferior services to the Proposed Club.*

How the Camden Golf Club²² is inferior and smaller needs to be explained as this club has sweeping views, an 18-hole golf course and many facilities such as a café, restaurant, courtesy bus and has significant catering facilities for family and social functions.

It is a large well-loved and well- used community facility that provides many services to the community including functions marking life events such as milestone birthdays and funeral wakes.

²² Camden Golf Club *Official Club Brochure 2017* Available at http://www.camdengolfclub.com.au/wp-content/uploads/2017/04/PPAU0119_Camden-GC_52pp-Brochure-_FINAL_LR.pdf

The LIA (p.12) claims: *The new development area, the adjacent area and the local community within 5 kilometres of the Proposed Club do not have the full benefit of the services and facilities of the kind provided by registered clubs.*

Services and facilities are in abundant supply in the area.

If poker machines are "needed" they are readily available²³. From 2014 to 2016, the number of poker machines in the Camden local government area increased by 82 machines to 514 machines across the area's licensed venues, the highest increase in NSW. In 2016 Camden had 348 machines at local clubs and 166 at hotels, nearby Campbelltown Clubs had 1588 machines and hotels 324.

Using the methodology of the application (LIA pp 5-6) the distances from various areas have been calculated in relation to the existing registered clubs. The registered clubs found at ClubsNSW by entering the name of the suburbs included in the community catchment area defined in the LIA (pp 5-6) are as follows:

Camden Golf Club Lodges Rd Narellan 2567

Camden RSL 23 Cawdor Rd Camden 2570

Camden Sports Club 22 Cawdor Rd CAMDEN, NSW 2570

Camden Valley Golf Resort incl. Lakeside 810 Camden Valley Way Catherine Field 2557

Campbelltown Catholic Club 20-22 Camden Road Campbelltown 2560

Campbelltown City Bowling Club Cnr Brown and Howe Sts Campbelltown 2560

Campbelltown RSL Club Carberry Lane, Campbelltown NSW 2560

Campbelltown Golf Club 1 Golf Course Drive, Glen Alpine NSW 2560

Western City Leagues Club 10 Old Leumeah Road Leumeah 2560

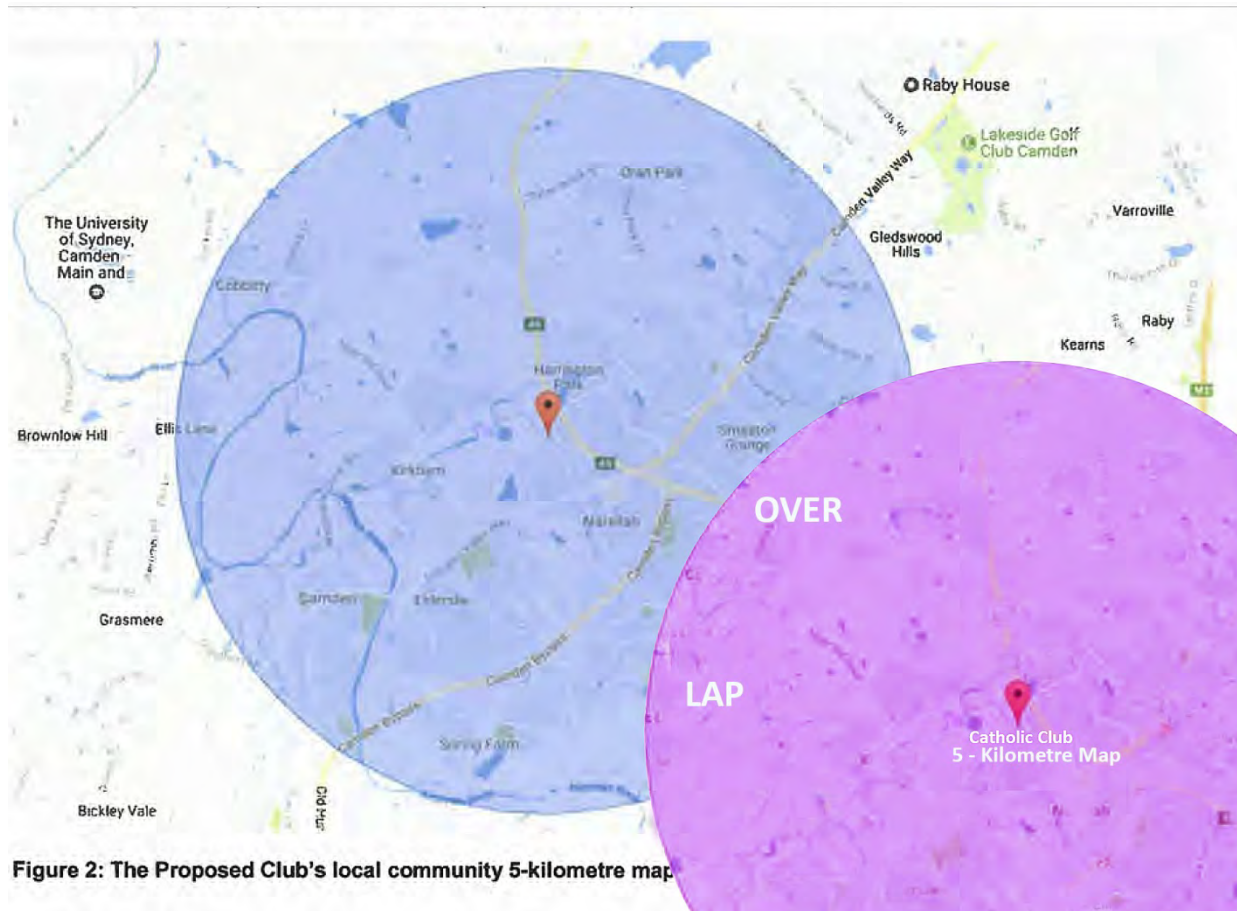
West's Tennis Club 16 Old Leumeah Road Leumeah 2560

There are of course many other local non-registered providers of services similar to those provided by registered clubs.

Note that the distance of 0.8 km for the population of 10,663 of Harrington Park (LIA p. 5) is somewhat understated as Harrington Park including Harrington Grove covers a large area. From the approximate centre of Harrington Park at Harrington Park Public School the average distance would be approximately 1.9 km.

²³ Daniel Zautsen (2017) *Poker machines across the Macarthur region are bringing in millions of dollars in revenue each year* Macarthur Chronicle Camden February 3, 2017 Available at <https://www.dailytelegraph.com.au/newslocal/macarthur/poker-machines-across-the-macarthur-region-are-bringing-in-billions-of-dollars-in-revenue-each-year/news-story/6b33790c1f3c95741a3d5e9ae585aad1>

As shown below the Proposed Club's local community 5-kilometre radius map (LIA Figure 2 p. 6) is deficient in that there is an overlap of proximity to registered clubs between Camden and Campbelltown local government areas.



Further we do not understand why Gledswood Hills and Grasmere for instance are included in the analysis of potential membership of the Proposed Club but are outside the 5 km radius of club community. Moorebank Sports Club (Sporties) has purchased 14,000 sq. metres of land in Gregory Hills, which is inside the radius (and near to Gledswood Hills), and lodged applications for a club development and license.²⁴ Membership of Sporties would be drawn particularly from Gregory Hills which is included in the analysis of potential membership of the Proposed Club.

The overlap between Camden and Campbelltown communities is very apparent in the following table of *Distances to Registered Clubs*. Currans Hill for example is closer to Campbelltown Catholic Club than the Proposed Club at 2A Porrende St Narellan.

²⁴ See <https://moorebanksports.com.au/our-story/important-information/club-renovations-bistro/>

Table of Distances to Registered Clubs

Registered Clubs		Proposed 2A Porrende St Narellan	Camden Golf Club	Camden RSL Club	Camden Sports Club	Camden Valley Golf Resort (Lakeside)	Campbell -town Catholic Club	Campbell -town City Bowling Club	Campbell -town RSL Club	Campbell -town Golf Club	Western Suburbs Leagues Club	West's Tennis Club
Suburb	Population	Road distance (not straight line) to the approx. centre of suburb. Based on Google Maps.										
Cobbitty	2,063	6.4	8.4	7.3	7.3	10.1	14.1	15.3	15.3	16.7	17.5	17.5
Oran Park	4,765	4.8	7.4	10.4	10.4	5.5	13.2	14.7	14.3	15.6	16.9	16.9
Catherine Field	1,657	9.6	10.3	15.0	15.0	4.2	14.7	15.4	16.5	17.1	13.7	13.7
Gledswood Hills	22	9.1	7.1	9.9	9.9	1.0	11.6	14.1	12.7	14.0	12.4	12.4
Ellis Lane	857	10.4	9.6	4.9	4.9	15.0	20.8	22.4	22.4	25.1	23.3	23.3
Kirkham	699	3.7	3.7	3.9	3.9	10.9	11.0	12.1	12.1	13.6	14.4	14.4
Narellan	3,616	1.8	1.1	5.3	5.3	8.8	8.9	10.1	10.0	11.5	12.3	12.3
Harrington Park	10,663	1.9	4.2	6.9	6.9	7.6	10.3	11.4	11.4	12.9	16.3	16.3
Smeaton Grange	15	4.1	4.8	4.7	4.7	9.9	11.9	13.1	13.0	14.5	15.3	15.3
Currans Hill	5,309	5.8	6.0	8.6	8.6	6.9	5.1	6.2	6.2	7.7	8.5	8.5
Gregory Hills	4,985	6.8	9.2	12.0	12.0	6.1	5.5	6.7	6.6	8.1	6.2	6.2
Grasmere	1,963	8.7	8.2	3.5	3.5	13.6	19.4	10.5	20.5	24.6	22.8	22.8
Camden	3,230	4.9	4.3	0.5	0.5	9.7	14.4	15.6	15.5	17.0	17.8	17.8
Elderslie	6,005	3.6	2.6	2.1	2.1	9.2	12.6	13.8	13.8	15.2	16.1	16.1
Narellan Vale	7,193	5.1	2.7	7.9	7.9	9.2	7.4	8.5	8.5	10.0	10.8	10.8
Mount Annan	11,703	6.6	4.2	9.4	9.4	9.1	6.5	7.7	7.7	9.1	9.9	9.9
Cawdor	434	8.6	10.9	6.6	6.6	17.8	20.0	19.4	20.0	16.9	21.5	21.5
Camden South	4,539	10.7	6.3	3.9	3.9	13.2	15.2	16.4	16.3	19.0	18.6	18.6
Camden Park	2,238	11.5	8.7	6.3	6.3	15.6	17.6	18.8	18.8	18.0	21.1	21.1
Total	71,956											
Campbelltown	12,566	10.2					0					

Allowing for a 1 km tolerance in determining the centre of suburbs defined in the LIA as catchment areas of potential membership, the shaded cells of the table demonstrate that residents of the catchment suburbs are already within similar proximity to at least one and usually more existing registered clubs. The 11,703 people of Mount Annan for instance on average are closer to Camden Golf Club (4.2 km) and Campbelltown Catholic Club (6.5 km) than to the Proposed Club (6.6 km).

The only exception is Harrington Park residents who would be closer to the Proposed Club than to existing registered clubs. However as already covered above Harrington Park has two existing unregistered clubs and one under construction in Harrington Grove West, the area relied upon in the application. Even so residents of Harrington Park on average are within similar distance to existing registered clubs as residents of other catchment suburbs are to the Proposed Club. For example Narellan Vale is approximately 5.1 kms from the Proposed Club and Harrington Park is approximately 4.2 kms from Camden Golf Club.

The Proposed Club's catchment population is much smaller than argued in the application. It is simply incorrect to claim that the community does not have *the full benefit of the services and facilities of the kind provided by registered clubs* (LIA p. 12).

From a social perspective, as corroborated by research, we conclude that only harm can result from the introduction of more EGMs into our area. Further a 26% increase in the number of EGMs is not justified on any ground including population growth which is forecast to be proportionally much less in the catchment area at between 3.7% in the more immediate area and 8.7 in Camden local government area. We see nothing but detriment to families and community welfare.

From a regulatory perspective we have explained why Harrington Grove should not be regarded as a "new development area" within 1 km of the Proposed Club and have demonstrated that Harrington Grove and the wider community do not suffer from any lack of access to club-like facilities and services.

We have explained and evidenced in this submission why no net benefit to the community has been demonstrated through the Local Impact Assessment. We urge the ILGA to reject the application outright on behalf of the community.

End