
From: DYPXCPWEB@northernbeaches.nsw.gov.au
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13/06/2025

MR Matthew Murray
4 Tabora ST
Forestville NSW 2087
[REDACTED]

RE: DA2024/1303 - 11 / 0 Melwood Avenue FORESTVILLE NSW 2087

Submission: Comments on the Operational Plan of Management (6 June 2025) - Section 10: Responsible Conduct of Gaming

I would like to submit comments regarding the Operational Plan of Management dated 6 June 2025, specifically in relation to Section 10: Responsible Conduct of Gaming.

Summary of Concerns

For me, the Plan currently lacks specific measures or guiding principles to address the potential exposure of poker machines and gaming-related themes to individuals who are not visiting the club for gambling-particularly children. This represents a significant oversight, especially given the Club's positioning as a "family club" and a "safe" space for the entire community.

My concerns are based on the continuation or even expansion of the current gaming layout and practices at the Forestville Club. At present, all patrons see the gaming area due to its prominent, central gamers entrance-designed in a "casino-style" manner. This entrance is clearly visible from the main social and family areas of the club. I feel that this design may have the effect of promoting gaming activities to all and so is not "safe" for families. To partially obscure this gaming area entrance view, the Club has installed large, bright digital banner screens. However, these screens continuously display bright, eye-catching imagery reminiscent of poker machine characters or "VIP" themes. To me, this voids the purpose of blocking the pokies view and constitutes a form of gaming signage and imagery, even if not explicitly labelled as such. The Plan of Management needs to ensure these types of practices are defined as concepts and do not continue to the new club.

Impact on Families and Children

My concern is that this kind of visual exposure may act with a "shop window" effect, subtly encouraging both adults and children to engage with gambling or to find it enticing. Furthermore, I feel that the visibility of the gaming area from central, non-gaming spaces risks normalising gambling as a routine part of family life, socialising, dining, and drinking. If the Club is to uphold its identity as a family-friendly, safe venue it must clearly acknowledge these aspects, and directly address them through more explicit, thoughtful design and policy.

The Clubs NSW Gaming Code of Practice

The Plan references the Clubs NSW Gaming Code of Practice (Clause 67), which people might see as a general framework for ensuring family safety. However, based on my personal experience in raising these issues with Clubs NSW under the Gaming Code of Practice, the Code may not fully cover these features and concepts. As a result, I request that we still call out and demonstrate these issues, rather than assume coverage under the Gaming Code of Practice, which is non-statutory anyway. I am happy to discuss this further if required.

While the Plan of Management does refer to "signage" (Clauses 68 and 69), this limits the scope to "mandatory signage", being only about the signs the club must put up. My concern lies with non-mandatory signage, signs that are also promotions, and internal design elements that may also function as signs.

As I understand it legislation prohibits external "VIP" signage and imagery taken to be associated with this. However, internal VIP signs and imagery use remains a legal grey area to me. I also find it difficult to see how the Clubs NSW Gaming Code of Practice covers the VIP signs and imagery topic. The risk of having VIP style signs and imagery inside the building must be explicitly clear so that the community can hold the Club to account without having to become lawyers to interpret other more generic laws, Plans and Codes.

Recommendations for inclusion in the Plan of Management

To address these concerns and any statutory or non-statutory code grey areas, I recommend the Plan of Management covers the points I am making, and in particular:

- The direct and indirect exposure of club patrons to gaming themes, particularly those who are not coming to gamble
- The internal layout of gaming areas in relation to social and family spaces, including gaming entrance visibility and the indirect signage and promotional effects of these
- The use of visual imagery that may resemble pokie characters, or "VIP" themes or codes for these (e.g. lightning, Egyptian themes), even if not intended as promotional
- The specific indirect impacts on children, not just seniors, and how the Club balances its dual identity as a family venue and likely becoming one of the largest gaming facility 'meccas' in the North Shore

Finally, the Club's Gaming Plan of Management explains (67) that there is an Attachment C which "outlines the initiatives taken by the Club to be a responsible leader within the community". However, they have not attached Attachment C for review. Please supply this as soon as possible.