

## **Tawa Community Board – Gambling Venues Policy Submission**

With the council having to review its gambling venues policy every three years, it is a suitable time to ensure that not only is the policy working as it intends, but to ensure that suitable safeguards are built into the policy to protect vulnerable members of the community from problem gambling with the right of people to participate in recreational gambling and to recognise the positive aspects of revenue generated from pokies.

It appears that the council only considers that people in some suburban areas, dependant upon criteria using Ministry of Health socio-demographic risk factors associated with problem gambling, need to be controlled and venues or numbers of pokies reduced to some arbitrary figure of 300 to 1 – this ratio does not take into account, for example, the ratio of children within a given area within the areas of interest (e.g. Tawa) which has a high proportion of young people within its boundaries.

Control upon numbers of venues and pokies should also be considered for the central region – while it is accepted that numbers haven't increased in this region the Council should still have greater control over the numbers and sites of pokies in this area if they to be seen to have control and be serious about managing the vulnerable members of the public from gambling wherever they live.

We believe that there are insufficient controls placed upon the central region in the draft policy and would like to see a similar restriction placed upon this area to other defined areas within the policy.

It is stated within the policy that the Gambling Act 2003 (the Act) states that a venue hosting gaming machines “cannot have gaming machines as its primary purpose” and that local authorities' consent must be sought by all venues that:

- are seeking a licence for the first time;
- are seeking to increase machine numbers; or
- have a licence that has lapsed for six months or more.

This would appear to leave out those premises that were present prior to the Act, many of which have eighteen pokie machines [grandfathered under the act] and would appear to contravene the Act (primary purpose) by their appearance.

It is of concern that pokies, as a percentage of total gambling expenditure, are just below 50%. When one considers an additional 23% (744 of 2034 casinos, 2008) and casino gambling would include a significant portion a pokie machines, then this form of gambling does appear to be problematic.

It is stated that the total number of pokies in the capped zones have remained relatively consistent – this is hardly surprising when, for example, we look at the northern region's 10 venues, with 7 appear to be grandfathered – and within that region Tawa: three venues, with 41 machines, two of those venues with eighteen each grandfathered; and the northern region having reached its cap of 146, thereby preventing any further venues or machines being allowed.

The restrictions placed upon the Council under the Act severely restrict the Council and its ability to change the problem areas identified due to this grandfathering under the Act. The Council must therefore ensure that its approach looks at what it can actively do and signal to the owners and venues the restrictions it wishes to place under this policy.

It is believed that the Council proposed policy approach does not go far enough, considering the level of “problem gambling” identified within its boundaries. While it is acknowledged that close proximity of pokies to areas where people are more likely to become problem gamblers is an issue, the vulnerable members can still easily travel to a nearby area or indeed to the central region.

The areas of concern have significant clusters of pokies, many of which are grandfathered under the Act, thereby limiting the Council’s ability to control the concerns.

We would recommend that Council should make representation to Government to remove the grandfather provisions from the Act. Allowing unrestricted pokie machines in the central region is contra to the known social impact of pokie machines and therefore some restrictions should be put in place.

We would suggest to Council that it looks at altering the proposed approach:

- Permit pokie venues to be established anywhere in the Wellington city district with limitation on where located (to prevent clusters)
- Set a population based cap on the numbers of pokies that may be permitted in all zones (with no exception)
- No restrictions on TABs

The proposal continues to allow pokie venues to be established with a cap on the total number of pokies permitted and the number of pokie machines (maximum of nine per venue), giving greater control over misuse and gambling problems; we would suggest the Council seriously aim at restricting future growth by further limiting the ratio of machines to 1 to 400 people within the zones if it is serious about controlling the problem gambling that is occurring and growing in the Wellington district.

It is understood the ability of the Council to properly control areas of concern is greatly limited while the grandfathering remains under the Act and perhaps Council should look at other areas it has to control pokie numbers and venues in the areas of concern (eg venue licensing, primary purpose rules, ensuring when business are on sold the restricting of numbers are enforced).

There is concern that under the Act premises that are grandfathered (have 18 machines) can only reduce those numbers by voluntarily reducing, going out of business or on selling the business. If ‘on selling the business’ is a criteria, it would appear that a significant majority of the current venues have not sold since 2001 - we question whether this is the case and clarification is sought on exactly what the situation is when the numbers can be reduced to nine machines on the sale of a pokie venue:-

- E.g iIonar to the office café and bar

- E.g Bull and gate to Casa bar
- E.g sale of business since 2001

We confirm that no restrictions on TAB should continue.

It is accepted that there are benefits to some sections of the general community from these machines by funding sporting, recreation and community organisations and social infrastructure.

We believe it is important to ensure that this revenue is locally based and not distributed to areas outside the local district.

No oral submission is requested

**Tawa Community Board**  
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