Hearing Agenda

Class 4 Gambling Venue Policy 2026 and Totalisator Agency Board Venue Policy 2026

Friday 6 November 2026
9am

Council Chamber
215 High Street
Rangiora

Council:
Councillor Tim Bartle
Councillor Brent Cairns
Councillor Wendy Doody
Councillor Jason Goldsworthy
Deputy Mayor Philip Redmond

WAIMAKARIRI
DISTRICT COUNCIL

WAIMAKARIRI DISTRICT COUNCIL

THE HEARING AND DELIBERATIONS OF THE CLASS 4 GAMBLING VENUE POLICY 2026 AND TOTALISATOR AGENCY BOARD VENUE POLICY 2026 WILL BE HELD IN THE COUNCIL CHAMBER, RANGIORA SERVICE CENTRE, 215 HIGH STREET, RANGIORA ON FRIDAY 6 NOVEMBER 2026 COMMENCING AT 9AM.

BUSINESS

Page No

1. APOLOGIES

2. CONFLICTS OF INTEREST

Conflicts of interest (if any) to be reported for minuting.

3. HEARING OF SUBMISSIONS

9.10am	Prevention Minimisation of Gambling Harm Territorial Local Authority Policy Working Group, Nicki Carter and Dr Charles Egwuba
9.25am	National Public Health Service, Dr Cheryl Brunton (via Audiovisual Link)
9.40am	Micheal James Brookland
9.55am	Rangiora RSA Club, Jane Sommerville
10.10am	Gaming Machine Association of New Zealand, Jarrod True (via Audiovisual Link)

4. STAFF REPORT

4.1. Class 4 Gambling Venue Policy 2026 and Totalisator Agency Board Venue (TAB) Policy 2026: Hearing Panel Report and Officer Recommendations – Nadeesha Thenuwara (Policy Analyst)

3-201

RECOMMENDATION

THAT the Waste Management and Minimisation Plan Hearing Panel:

(a) **Receives** Report No. 261019335828.

(b) **Receives and considers** all submissions on the Draft Class 4 Gambling Venue Policy 2026 and Draft TAB Venue Policy 2026.

(c) **Notes** that staff will prepare amended drafts of the Class 4 Gambling Venue Policy 2026 and TAB Venue Policy 2026, reflecting the Panel's decisions, and report back to the Council for final adoption on 2 February 2027.

WAIMAKARIRI DISTRICT COUNCIL

REPORT FOR DECISION

FILE NO and TRIM NO:	POL-08-81/ 261019335828
REPORT TO:	Class 4 Gambling Venue Policy 2026 and Totalisator Agency Board Venue Policy 2026 Hearing Panel
DATE OF MEETING:	6 November 2026
AUTHOR(S):	Nadeesha Thenuwara, Policy Analyst
SUBJECT:	Class 4 Gambling Venue Policy 2026 and Totalisator Agency Board Venue (TAB) Policy 2026: Hearing Panel Report and Officer Recommendations

ENDORSED BY:
(for Reports to Council, Committees or Boards)

General Manager | Chief Executive

1. SUMMARY

1.1. This report presents the results of public consultation on the Draft Class 4 Gambling Venue Policy 2026 and Draft TAB Venue Policy 2026, undertaken using the Special Consultative Procedure from 8 September to 9 October 2026. A total of 70 submissions were received, with seven (7) submitters requesting to be heard. This report summarises the quantitative results and key themes arising from consultation and provides officer analysis for consideration by the Hearing Panel.

1.2. Feedback received on the Draft Class 4 Gambling Venue Policy 2026 primarily related to:

- The provision allowing the establishment of new Class 4 gambling venues.
- The retention of the current per capita cap policy.
- The retention of the current relocation policy.

Feedback received on the Draft TAB Venue Policy 2026 primarily related to the provision allowing the establishment of new standalone TAB venues.

1.3. Overall, consultation feedback demonstrated opposition to the provision allowing the establishment of new Class 4 gambling venues, the provision allowing the establishment of new standalone TAB venues, and the retention of the current per capita cap policy for regulating electronic gaming machines (EGMs). However, the majority of submitters who responded to the question relating to the Class 4 venue relocation policy supported retaining the current policy without change. The quantitative results of submitters' responses are as follows:

- Of the 70 submitters, 44 (63%) opposed continuing to allow new Class 4 gambling venues within the district.
- Of the 70 submitters, 41 (59%) opposed continuing to the current per capita cap (1 EGM per 260 adults).
- Of the 70 submitters, 28 (40%) supported retaining the current relocation rules for Class 4 gambling venues, while the remaining submitters were evenly split between opposing the rules and being unsure (21 submitters, 30% each).
- Of the 65 submitters who responded, 41 (63%) opposed continuing to allow new standalone TAB venues within the district.

1.4. Submitter opposition to allowing new Class 4 gambling venues and new standalone TAB venues, as well as retaining the current per capita cap policy, was driven by concerns regarding the potential social and economic harm associated with gambling, views that gambling disproportionately affects vulnerable people, including low-income households, and concerns that the proposed policies could increase opportunities for gambling within the district. While the concerns raised by submitters are acknowledged and reflect genuine community views, they were generally accompanied by little or no district-specific evidence demonstrating existing gambling-related harm over the previous three years, or anticipated gambling-related harm during the three-year period for which the draft policies would apply if adopted.

1.5. Key issues arising from the review included balancing community views with the available evidence, balancing gambling harm minimisation with the availability of gambling opportunities, and considering the potential unintended consequences of stronger restrictions on Class 4 gambling.

1.6. Under the Gambling Act 2003 and Racing Industry Act 2020, Council is required to have regard to the social impact of gambling within the district when reviewing and adopting gambling venue policies. The impact assessments undertaken as part of these policy reviews did not identify sufficient evidence to justify more restrictive policy settings for either Class 4 gambling venues or TAB venues. As noted in paragraph 1.4, formal public consultation also provided little or no district-specific evidence of existing or anticipated gambling-related harm. While a number of submitters opposed key provisions of the draft policies, neither the review nor the consultation process provided sufficient evidence to justify departing from the draft policies as publicly notified. Accordingly, officers recommend retaining the direction of the Draft Class 4 Gambling Venue Policy 2026 and Draft TAB Venue Policy 2026 as publicly notified, subject to any minor administrative amendments required.

1.7. The Hearing Panel is asked to consider the officer analysis and recommendations and provide direction on whether any amendments are required before the gambling policies are presented to Council for final consideration and adoption. If adopted, the recommended approach will deliver a legally robust and future-focused regulatory framework that is consistent with the findings of the impact assessments and informed by consultation feedback, without the need for further public consultation unless substantive changes are required.

Attachments:

i. Draft Class 4 Gambling Venue Policy 2026 (Trim: 260723179191).
ii. Draft TAB Venue Policy 2026 (TRIM: 260723179200).
iii. Summary of Public Consultation: All Submissions Received (Trim: 261019335826).
iv. Prevention Minimisation of Gambling Harm Territorial Local Authority Policy Working Group written submission (Trim: 261013321854).
v. National Public Health Service written submission (Trim: 261013323532).
vi. Gaming Machine Association of New Zealand written submission (Trim: 261016335145).
vii. Kiwi Gaming Foundation written submission (Trim: 261016335152).
viii. New Zealand Community Trust written submission (Trim: 261013321888).
ix. Whitiora Ltd written Submission (Trim: 260914278551).
x. Clubs New Zealand written submission (Trim: 261012309767).
xi. Draft Gambling Policies Consultation Submissions: Officer Analysis and Recommendations (Trim: 261022342984).
xii. Social Impact Assessment of Gambling in Waimakariri (Trim 260624149960).

2. RECOMMENDATION

THAT the Gambling Policies Hearing Panel:

(a) **Receives** Report No. 261019335828.

(b) **Receives and considers** all submissions on the Draft Class 4 Gambling Venue Policy 2026 and Draft TAB Venue Policy 2026.

(c) **Notes** that staff will prepare amended drafts of the Class 4 Gambling Venue Policy 2026 and TAB Venue Policy 2026, reflecting the Panel's decisions, and report back to the Council for final adoption on 2 February 2027.

3. BACKGROUND

3.1. The Waimakariri District Council (WDC) gambling policy review was undertaken as part of the statutory three-year review cycle. As part of this review, a Social Impact Assessment of gambling in the Waimakariri District (Attachment v) was commissioned to gather robust information on the social impacts, harms, and benefits of gambling and to inform any proposed policy changes or amendments.

3.2. Section 102 of the Gambling Act requires the Class 4 Gambling Venue Policy to be reviewed within three years of its previous review. Similarly, section 97 of the Racing Industry Act 2020 requires the TAB Venue Policy to be reviewed within three years of the previous review. Both policies continue to have effect while they are due for review or undergoing review.

3.3. The review concluded that the current gambling policies should be retained, subject to minor amendments, primarily wording changes to improve readability and understanding. Other proposed changes included the introduction of a new definitions section and alignment with current District Plan zoning and Community Outcomes.

3.4. In August 2026, the Council approved the Draft Class 4 Gambling Venue Policy 2026, Draft TAB Venue Policy 2026, Social Impact Assessment Report, and the associated Statement of Proposal for public consultation using the Special Consultative Procedure. Formal public consultation was undertaken from 8 September 2026 to 8 October 2026.

3.5. The hearing panel appointed by the Council to hear submissions on the Draft Gambling Policies comprises Deputy Mayor Philip Redmond, Cllr Tim Fulton, Cllr Wendy Doody and Cllr Jason Goldsworthy.

CONSULTATION SUMMARY

3.6. Consultation was promoted through direct emails to key stakeholders who had provided feedback during the review process, including problem gambling service providers, corporate societies, and grant recipients, as well as through email communications to Let's Talk Waimakariri subscribers.

3.7. Engagement results:

- 161 visits to the Let's Talk Waimakariri page
- 64 engaged participants.
- 70 formal submissions were received, including seven written submissions recorded by staff.
- Most submissions were received from individual residents (58 submissions, 83%), while 12 submissions (17%) were received from organisations.
- Of the 12 organisational submissions, one was a joint submission from the Problem Gambling Harm Territorial Local Authority Policy Working Group and Social Services Waimakariri. While counted as a single submission, it represented the views of a number of organisations including the Problem Gambling Foundation, Purapura Whetū Trust, Asian Family Services, Te Kāika (Ōtākou Health Limited), Te Piki Oranga, and Mapu Maia.

3.8. **Summary of submissions, quantitative results and themes**

Table 1: Summary of submissions

Topic (Survey Q#)	Support	Opposition	Key Themes from Submitters
Q1- Do you think the Council should continue to allow new Class 4 gambling venues within the district? Q2 - Please tell us the reason for you answer above	24(34%)	44 (63%)	<u>Themes raised in opposition</u> • Gambling-related harm • Impacts on vulnerable communities • Sufficiency of existing gambling opportunities • Limited community benefit • Support for a sinking lid approach • Online gambling reduces the need for additional venues • Concerns about co-location of gambling and alcohol <u>Themes raised in support</u> • Community funding benefits • Meeting the needs of a growing district • Preference for regulation rather than complete prohibition • Concerns about unintended consequences of restrictive policies • Personal choice and adult freedom

Q3-Do you support continuing the current per capita cap of one electronic gaming machine (EGM) per 260 residents aged 18 years and over? Q4 - Please tell us the reason for you answer above	27(39%)	41 (59%)	<u>Themes raised in opposition</u> • Preference for a sinking lid policy and view that the current cap is too high • Gambling harm and addiction concerns • Preference for banning EGMs entirely • Need for increased availability • Preference for online gambling instead of local EGMs <u>Themes raised in support</u> • Current cap is appropriate and balanced • Harm minimisation through regulation • Supports controlled growth • Community funding benefits • Concern that stricter policies could shift gambling online
Q5 - Do you think the current relocation rules should remain the same? Q4 - Please tell us the reason for you answer above	28(40%)	21(30%)	<u>Themes raised in opposition</u> • Concerns about gambling harm • Support for tighter location and regulatory controls • The current relocation policy is too restrictive <u>Themes raised in support</u> • Current relocation policy is appropriate • Relocation is a fair and practical business provision • Retain the policy to support community funding • Support relocation with additional location restrictions: restrict relocations to high-deprivation areas, strengthen exclusion zones around sensitive sites, prevent venue clustering.
Q8 Do you think the Council should continue allowing new standalone TAB venues within the district? Q9-Is there anything else Council should consider when making decisions about the Draft TAB Venue Policy?	16(25%)	41(63%)	<u>Themes related to Q9</u> • Harm minimisation and community impacts • support for further restrictions • Economic and social benefits of TAB betting and the racing industry

OFFICER ANALYSIS

3.9. As shown in Table 1, the majority of submitters opposed the proposed approach to new Class 4 venue establishment provisions (44, 63%), retaining the current per capita cap (41, 59%), and allowing the establishment of standalone TAB venues in the Waimakariri District (44, 63%).

3.10. Submitters who opposed the proposed approach to new Class 4 venue establishment provisions most frequently cited concerns about gambling-related harm, including addiction, financial hardship, family harm, and wider social impacts. Other commonly raised concerns related to the impacts of gambling on vulnerable communities, the view that existing gambling opportunities are sufficient, and perceptions that gambling generates limited community benefit. Less common themes included support for a sinking lid approach, reliance on online gambling alternatives, and concerns about the co-location of gambling and alcohol. The concerns raised by submitters opposed to the establishment of new standalone TAB venues were broadly consistent with those raised in relation to new Class 4 gambling venues

3.11. Submitters who supported the proposed new Class 4 and standalone TAB venue establishment provisions most commonly cited the benefits of gambling and TAB betting, including community funding and employment opportunities. Other reasons included a preference for regulation rather than prohibition and the view that gambling and betting are legitimate forms of entertainment.

3.12. Similar themes were reflected in submissions opposing the retention of the current per capita cap. The most common view was that the cap remains too high and should be replaced with a sinking lid policy to progressively reduce the number of EGMs and gambling venues over time. Notably, all gambling harm service providers that made submissions, including the National Public Health Service, supported replacing the current per capita cap with a sinking lid policy. Some submitters also advocated for the complete removal of EGMs. In contrast, a small number of submitters opposed the current cap because they supported greater gambling availability based on principles of personal choice and individual responsibility.

3.13. In contrast to views on retaining the current per capita cap, the largest proportion of submitters supported retaining the current relocation policy (28 submissions, 40%). Submitters generally considered the policy to be an appropriate approach that provides venues with the flexibility to relocate to more suitable locations. Some also noted that the policy may help maintain community funding. Whitiora Ltd supported the relocation policy subject to additional location restrictions and harm-minimisation measures, including restrictions on relocations into high-deprivation areas, stronger exclusion zones around sensitive sites, and measures to prevent venue clustering.

3.14. All organisations or corporate societies representing Class 4 venue operators supported the Draft Class 4 Gambling Venue Policy 2026 and the Draft TAB Venue Policy 2026.

3.15. Submissions opposing the proposals generally favoured a more restrictive approach to gambling provision within the district. Officers acknowledge the importance of the concerns raised. However, the submissions primarily reflected individual views and perceptions and did not provide sufficient supporting evidence to demonstrate that the current policy is ineffective in addressing gambling-related harm within the district.

3.16. Overall, submitters highlighted a number of factors that Council should consider when making final decisions on the draft policies, including:

- Gambling harm and the protection of vulnerable people.
- Location-based harm minimisation, including regulating the proximity of Class 4 gambling venues to sensitive sites such as schools, libraries, and community facilities, and preventing the establishment or relocation of venues in areas of high socio-economic deprivation.
- Community benefits derived from Class 4 gambling and TAB betting, including community grant funding and employment opportunities.
- Avoiding overly restrictive policy settings that cannot be justified by local evidence.
- The potential impact of online gambling, including the possibility that reducing access to Class 4 gambling venues may encourage greater participation in online gambling.
- Operational impacts on venue operators, including concerns that further reductions in the number of venues or gaming machines could concentrate gambling activity in fewer venues, creating operational challenges and increasing patron demand at remaining venues.

4. KEY ISSUES

4.1. Balancing community views and available evidence

A key issue arising from consultation is that many submitters favoured a more restrictive approach to gambling within the district. However, neither the submissions nor the Social Impact Assessment provided sufficient local evidence to demonstrate that the current policy settings are ineffective or that additional restrictions are warranted at this time.

4.2. **Balancing gambling harm minimisation and gambling availability**

Many submitters, including gambling harm service providers, expressed concerns about gambling-related harm and supported more restrictive approaches, including a sinking lid policy. Conversely, organisations representing Class 4 venue operators, along with some individual submitters, considered the proposed policy settings to provide an appropriate balance between harm minimisation, community benefits, and operational certainty.

4.3. **Potential unintended consequences of strong restrictions on Class 4 gambling**

Some submitters noted that more restrictive policy settings could have unintended consequences, including reduced community funding, increased participation in online gambling, and the concentration of gambling activity in fewer venues. These considerations should be weighed against the harm-minimisation objectives of the policies and the available evidence.

5. OPTIONS

5.1. The following options were considered as part of the review of the Draft Class 4 Gambling Venue Policy 2026:

5.2. **Option 1: Amend the draft class 4 gambling venue policy 2026 to replace the current per capita cap with an absolute cap**

This option sets a maximum number of EGMs that may operate within the district, regardless of population growth. The cap would be determined by the Council, taking into account community views and other relevant factors. A common approach is to set the cap at the current number of EGMs, preventing future growth while maintaining existing provision.

Advantages

- Helps maintain a fixed level of control over gambling availability while still allowing some flexibility for Class 4 gambling.
- The cap can be tailored to reflect community preferences and local circumstances.
- Relatively simple to administer and monitor.
- Provides certainty for both the community and gambling operators, as the maximum number of EGMs permitted in the district is known.
- Helps address the concerns raised by a higher number of submitters who supported making the policy more restrictive.

Disadvantages

- Less effective at reducing gambling availability than a sinking lid policy (Option 2).
- The cap is not responsive to population growth or changes in the district. Over time, it may become too high or too low relative to the population.
- Can create inequalities if the current distribution of EGMs is not appropriate. For example, if a high proportion of EGMs are currently located in areas of higher deprivation, an absolute cap without relocation provisions could effectively lock this distribution in place.
- May face opposition from gambling operators seeking to expand Class 4 gambling availability within the district.

While national evidence demonstrates that Class 4 gambling can cause social harm, the relevance of that evidence to the district's circumstances needs to be considered alongside the findings of the Social Impact Assessment (Attachment iv) and other available local information. The review did not identify sufficient district-specific evidence to demonstrate that the current policy settings are ineffective in addressing gambling-related harm or that additional restrictions are warranted at this time. Introducing a more restrictive policy in the absence of such evidence would not be supported by the findings of the review.

5.3. **Option 2 - Amend the draft class 4 gambling venue policy 2026 to replace the current per capita cap with a sinking lid policy**

Adopting a sinking lid means no new Class 4 gambling venues are permitted and existing venues are not allowed to increase the number of EGMs they operate or replace EGMs that are lost.

When a venue closes, its gaming machine licence cannot be transferred or re-established elsewhere in the district. This means the relocation provisions in the court policy will not available.

Advantages

- Provides the strongest available approach to minimising gambling-related harm.
- Ensures the number of EGMs decreases over time and cannot increase.
- Simple to administer and enforce.

Disadvantages

- Reductions in gambling-related harm may occur gradually, as the number of EGMs decreases over time.
- Limited flexibility in a growing district with an increasing population.
- May reduce funding available to community organisations through gaming machine grants.
- Selecting this option would require further public consultation on the Class 4 Gambling Venue Policy.
- This option may not address the concerns of submitters who favoured a more restrictive approach to gambling within the district.

While a sinking lid policy is generally considered one of the most effective approaches for reducing gambling-related harm, the review did not identify sufficient district-specific evidence to demonstrate that the current policy settings are ineffective or that additional restrictions are warranted in the Waimakariri District at this time. Although national evidence demonstrates that Class 4 gambling can cause social harm, the relevance of that evidence to the district's circumstances must be considered alongside the findings of the Social Impact Assessment and other available local information. The review found that the number of gambling venues and EGMs in the district is not increasing significantly, and indicators of problem gambling remain low and are not showing an increasing trend. Accordingly, introducing a more restrictive policy would not be supported by the findings of the review.

5.4. **Option 3: Retain the current per capita cap policy with minor administrative changes, if required.**

A per capita cap policy limits the number of EGMs that may operate within a district based on the size of the adult population. Under this approach, a maximum ratio of EGMs to residents aged 18 years and over is established. As the population changes over time, the maximum number of EGMs permitted in the district may increase or decrease accordingly.

Under Option 3, the current per capita cap of one EGM per 260 residents aged 18 years and over would continue, (38 EGMs per 10,000 residents aged 18 years and over).

Accordingly, the maximum number of EGMs permitted in the district would be 197 for the three-year period following the adoption of the next policy, until it undergoes its next statutory review in 2029. As the district currently has 163 EGMs, the proposed policy would allow for an increase of up to 34 EGMs before the maximum threshold is reached.

It is important to note that the Council used 2023 Census population data to calculate the maximum number of EGMs permitted in the district.[1]

[1] Statistics New Zealand provides annual subnational population estimates at the district level. However, these estimates use five-year age bands, which limit the ability to accurately estimate the population aged 18 years and over in Waimakariri. As a result, the Council will use Census data to calculate the maximum number of EGMs permitted under the per capita cap, as it did under the previous policy.

Advantages

- Responsive to population growth, with EGM numbers adjusted in line with changes in the adult population.
- Provides a balanced and business-friendly approach.
- Offers flexibility while still limiting increases in gambling availability.
- Allows the Council to manage EGM density over time.

Disadvantages

- Allows the number of EGMs to increase as the population grows, even where gambling-related harm persists.
- Could increase gambling-related harm if population growth is concentrated in areas of higher socioeconomic deprivation, where research indicates gambling harm is generally greater.
- More complex to administer than an absolute cap, as regular population updates and recalculations are required.
- Less effective at reducing gambling availability than a sinking lid policy (Option 2).

In addition to the advantages outlined above, the review found that while population growth has increased the number of EGMs that could be permitted under the current per capita cap, the actual number of operating EGMs has remained relatively stable and has slightly decreased since 2022, resulting in lower EGM availability relative to the adult population. As a result, the actual availability of Class 4 gambling relative to the adult population has decreased over this period. Accordingly, continuation of the current per capita cap, combined with limited growth in EGM numbers and a growing adult population, has resulted in lower Class 4 gambling availability than would otherwise have occurred under the policy. This indicates that the current policy settings are continuing to achieve a degree of restraint on gambling availability without the need for additional restrictions at this time. As outlined under Options 1 and 2, the review did not identify sufficient district-specific evidence to demonstrate that the current policy settings are ineffective or that additional restrictions are warranted at this time.

Please refer to Section 5 of the Officer Analysis and Recommendations Report (Attachment iv, TRIM 261019335827)

5.5. The following options were considered as part of the review of the Draft TAB Venue Policy 2026:

5.6. **Option 1 – Amend the draft policy to strengthen the policy by not providing provisions to establish new standalone TAB venues in Waimakariri**

Advantages

- Supports a precautionary approach to harm minimisation.
- Avoids introducing a new type of gambling in the district.
- Aligns with a low-gambling-exposure environment, given there are currently no standalone TAB venues.
- Reduces the risk of future social and financial harms associated with betting.
- Provides certainty to the community about the district's direction.
- Helps reflect the views of the majority of submitters.

Disadvantages

- Limits consumer choice and access to legal betting services locally.
- May result in displacement, with people travelling to other districts or betting online.
- Potential loss of economic opportunities, including employment and local spending.
- Reduces policy flexibility if future demand emerges.
- May be viewed as overly restrictive given the current low levels of gambling-related harm.

Given the district's low level of gambling-related harm, Option 1 is considered overly restrictive and inconsistent with supporting future business opportunities.

5.7. **Option 2- Retain the direction of the Draft TAB Venue Policy 2026 to allow new standalone TAB venues owned by TAB NZ to be established within the Waimakariri District, subject to the location-specific restrictions set out in the policy.**

Advantages

- Provides flexibility to respond to future demand as the population grows.
- Allows legal betting services to operate locally, improving accessibility.
- Could support local employment and business activity.
- May generate some economic activity through increased foot traffic and hospitality spending.

Disadvantages

- Introduces a new type of gambling, which may increase the risk of gambling-related harm.
- Potential social impacts on individuals, families, and the wider community.
- No guarantee of significant financial benefits being retained within the district. .May be viewed as inconsistent with harm minimisation objectives.
- Once established, venues may be difficult to remove.
- This option may not address the concerns of submitters who favoured a more restrictive approach to TAB betting.

Option 2 is considered to provide a balance between allowing for future economic opportunities and supporting harm minimisation objectives.

5.8. The Management Team has reviewed this report and supports the recommendations.

6. STRATEGIC ALIGNMENT AND COMMUNITY VIEWS

Mana Whenua Engagement

6.1. The subject matter and/or recommendations contained within this report are of interest to mana whenua. As such, Council staff have engaged with Whitiora Centre Limited, as key advisors to Te Ngai Tūāhuriri Runanga, who have provided the following feedback and/or advice:

6.1.1. Supports retaining the current policy settings but seeks stronger harm minimisation measures.

6.1.2. Supports additional location-based controls for Class 4 gambling venues, including:
- *Restricting venue relocations into areas of high socio-economic deprivation.*
- *Strengthening exclusion zones around schools, churches, social service providers, and high-deprivation areas.*
- *Using harm-mapping and socio-economic data to inform venue location decisions.*
- *Preventing the clustering of gambling venues within local communities.*

6.1.3. Supports retaining exclusions for gambling venues within special zones such as nohoanga and Pegasus.

6.1.4. Raised concerns about the concentration of gambling venues within higher deprivation areas and the relatively low proportion of gambling proceeds returned to the district through community grants.

6.1.5. Raised concerns about the lack of local data on gambling harm and recommended further work to:
- *Better understand gambling harm within the district.*
- *Investigate declining uptake of gambling harm support services.*
- *Improve the local evidence base for future policy reviews.*

6.1.6. Recommended that the same harm minimisation provisions and location-based controls applying to Class 4 venues also be considered for standalone TAB venues.

6.1.7. Supported stronger protections for vulnerable communities and evidence-based decision-making.

Groups, Organisations and the Wider Community

6.2. There are groups, organisations, or members of the wider community likely to be affected by, or to have an interest in, the subject matter of this report.

There are groups, organisations, and members of the wider community who are likely to be affected by, or have an interest in, the subject matter of this report. Gambling harm minimisation organisations, including the National Public Health Service, Problem Gambling Foundation, Asian Family Services, and Mapu Maia, as well as organisations and corporate societies representing Class 4 venue operators, provided feedback on the draft gambling policies. A summary of this feedback is provided in Attachment iii (TRIM 261019335826).

Implications for Community Wellbeing

6.3. There are implications on community wellbeing by the issues and options that are the subject matter of this report.

6.4. Class 4 gambling has both positive and negative impacts on the community. Any significant change to gambling policy can influence access to, and the availability of, Class 4 gambling. This may affect social and economic wellbeing, as well as public health outcomes within the community.

6.5. The recommended option is expected to have a neutral to positive impact on community wellbeing. They maintain existing measures to minimise gambling-related harm while preserving the financial and community benefits associated with gambling activity, including employment opportunities and funding for community organisations and projects. Overall, the recommendations are considered to provide a balanced approach that supports community wellbeing.

Community Outcomes and Strategic Priorities

6.6. The Council's community outcomes are relevant to the actions arising from recommendations in this report.

Community outcomes - social:

- Council commits to promoting health and wellbeing and minimizing the risk of social harm to its communities.

Community outcomes - economic:

- There are sufficient and appropriate locations where businesses can set up in our District.
- Enterprises are supported and enabled to succeed.

6.7. The Council's Strategic Priorities are relevant to the actions arising from recommendations in this report.

- Enhance community wellbeing, safety, inclusivity and connectedness
- Enable economic development and sustainable growth

7. OTHER IMPLICATIONS AND RISK MANAGEMENT

Financial Implications

7.1. There are no financial implications for the decisions sought by this report.

7.2. Funding is currently provided within the Annual / Long Term Plan. The development of the draft Policy has been carried out using existing resources including staff time, as part of the Strategy and Business Unit work programme. Implementation of the Policy will be undertaken by the Council's Environmental Service Unit following the adoption of the Policy,

Community Resilience and Sustainability

7.3. The recommendations in this report do not have sustainability and/or climate change impacts.

Risk Management

7.4. There are risks arising from the adoption/implementation of the recommendations in this report.

7.5. There are low to moderate risks arising from the adoption and implementation of the recommendations in this report. While the recommended approach maintains controls on gambling availability, it also allows for a limited increase in gambling availability in line with population growth. There is no risk-free level of gambling, and any increase in gambling availability may increase the risk of gambling-related harm. However, based on current evidence, including the low levels of identified problem gambling in the district and the existing regulatory controls, these risks are considered low to moderate and manageable.

Health and Safety

7.6. There are health and safety risks arising from the adoption/ implementation of the recommendations in this report.

7.7. Gambling-related harm is recognised as a public health issue and can negatively affect mental and emotional wellbeing, including increased stress, anxiety, depression, and reduced quality of life. As the recommended policy options allow limited growth in gambling availability, there is potential for an increase in gambling participation and, consequently, the risk of gambling-related harm. This may adversely affect the health and wellbeing of gamblers and those close to them.

7.8. The current policy considered these risks when it was originally developed. This review only assesses risks associated with any proposed policy changes. As no changes are recommended in relation to this matter, and the review has not identified any concerns with the current policy, the relevant risks remain unchanged.

8. CONTEXT

Consistency with Policy

8.1. This matter is not a matter of significance in terms of the Council's Significance and Engagement Policy.

Authorising Legislation

8.2. Gambling Act 2003

Racing Industry Act 2020

Local Government Act 2002

Authorising Delegations

8.3. The Council has the authority to make decisions in relation to the development, amendment, and adoption of gambling policies.

8.4. The Council will appoint a Hearing Panel to consider submissions and officer recommendations on the proposed Class 4 Gambling Venue Policy 2026 and TAB Venue Policy 2026. Following consideration of submissions and the Hearing Panel's recommendations, the Council will make final decisions on the proposed policies.

Waimakariri District Council
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Class 4 Gambling Venue Policy

1. Purpose

Class 4 gambling in New Zealand is regulated by the Gambling Act 2003. The Act requires territorial authorities to adopt a Class 4 Gambling Venue Policy and review it every three years.

The policy provides a framework for the Council to manage the availability and location of Class 4 gambling venues and the growth of Class 4 gambling activities within the district, with the aim of preventing and minimising gambling related harm to individuals, families and the wider community.

This policy should be read in conjunction with the definitions provided in Section 3.

2. Policy Context

Section 98 of the Gambling Act 2003 requires corporate societies to obtain territorial authority consent in the following circumstances:

- when applying to the Department of Internal Affairs for a Class 4 venue licence to establish a new gambling venue
- when seeking to increase the number of electronic gaming machines (EGMs) at an existing Class 4 gambling venue
- when proposing, in accordance with the Council's relocation policy, to relocate a Class 4 gambling venue

The Council must consider and determine applications for territorial authority consent in accordance with this Policy.

As part of each statutory review of the Policy, the Council assesses the social impacts of Class 4 gambling to better understand the local gambling environment, including its associated benefits and harms. The review process also provides an opportunity for community input through formal consultation, helping to ensure that the Policy reflects community views and remains appropriate for the district.

3. Definitions

The following definitions apply to this policy.

Availability of Gambling:
Availability of gambling means the extent to which Class 4 gambling opportunities are accessible within the district.

Class 4 gambling:

Gambling that satisfies the following criteria:

a) the net proceeds from the gambling are applied to, or distributed for, authorised purposes; and
b) either—
(i) no commission is paid to or received by a person for conducting the gambling; or
(ii) the only commission that is paid to or received by a person for conducting the gambling is a commission payment to a venue operator that complies with regulations made under section 371(1)(dd); and
c) there are game rules for the gambling; and
d) the gambling, and the conduct of the gambling, satisfies relevant game rules; and
e) either—
(i) the Secretary has categorised the gambling as class 4 gambling and not as another class of gambling; or
(ii) the gambling utilises or involves a gaming machine.

Council:

Council means the Waimakariri District Council.

District:

District means the Waimakariri District.

Gambling harm:

(a) harm or distress of any kind arising from, or caused or exacerbated by, a person's gambling; and
(b) includes personal, social, or economic harm suffered—
(i) by the person; or
(ii) by the person's spouse, civil union partner, de facto partner, family, whānau , or wider community; or
(iii) in the workplace; or
(iv) by society at large

Growth of gambling:

Growth of gambling means an increase over time in gambling participation, gambling expenditure, gambling frequency, the number of Class 4 gambling venues or EGMs, or the overall scale of Class 4 gambling activity within the district.

Unsuitable class 4 venues:

The following venues are declared unsuitable to be a class 4 venue:
(a) a venue at which the primary activity is anything other than onsite entertainment, recreation, or leisure focused on persons 18 years and over, including (without limitation)—
(i) a dairy, supermarket, or other similar venue:
(ii) a fast-food outlet or other similar venue:
(iii) an office:
(iv) a private residence:
(v) a sports stadium:
(vi) a circus, fair, amusement parlour, arcade or park, theme park, or other similar venue:
(b) a venue that is not a fixed permanent structure, including (without limitation)—

(i) a tent or marquee:
(ii) a vehicle, vessel, aircraft, trailer, or other conveyance:
(c) a footpath (whether or not undercover):
(d) a concourse area (whether or not enclosed):
(e) an Internet café or cyber-café, or any other venue at which the primary activity is electronic media (including games):
(f) a library, art gallery, museum, theatre, cinema, or other similar venue:
(g) a place of worship.

4. Policy Objectives

4.1. To control the growth of Class 4 gambling within the District.

4.2. To manage the availability of Class 4 gambling within the District.

4.3. To prevent and minimise harm to the community caused by gambling, including problem gambling.

4.4. To enable those who choose to participate in Class 4 gambling to do so, safely and responsibly within the District.

5. Policy Statement

5.1. New Class 4 Venue Establishment Provisions

5.1.1. The Waimakariri District Council allows the establishment of new Class 4 gambling venues within the District, subject to the requirements set out in this Policy.

5.2. Per Capita Cap Policy

5.2.1. The Council uses a per capita cap of 38 EGMs per 10,000 residents aged 18 years and over to regulate the number of EGMs that may be operated within the district. Accordingly, the maximum number of EGMs permitted in the district is 197*. This per capita cap will remain in effect until the policy undergoes its next statutory review in 2029.

*Note: The Council has used 2023 Census population data to calculate the maximum number of EGMs permitted in the district.

5.3. Location Specific Restrictions for Venues

5.3.1. Venues must not be located within a Residential Zone as defined by the Partially Operative District Plan 2025. These zones are:

- Large Lot Residential Zone
- Medium Density Residential Zone
- General Residential Zone
- Settlement Zone

5.3.2. Venues must not be located within the Kāinga Nohoanga or Pegasus Resort

Special Purpose Zones. These zones include residential activities, and allowing gambling venues within them would undermine the special purpose and unique character of the zones.

5.3.3. Venues must not be located on sites that would result in unnecessary exposure to Class 4 gambling activities for persons under 18 years of age, including at schools, playgrounds, and similar facilities.

5.3.4. Venues must not be located within premises where the primary activity is associated with children or families.

5.4. Venue specific restrictions

5.4.1. The primary activity of the venue, and its primary source of income, must not be Class 4 gambling.

5.4.2. The primary activity of the venue may be:

- The sale and supply of alcohol for consumption on the premises under the Sale and Supply of Alcohol Act 2012 (e.g. on-licensed premises, club-licensed premises, or chartered clubs); or

- The conduct of racing and betting under the Racing Industry Act 2020 (e.g. a TAB venue).

5.4.3. Electronic gaming machines must not be visible from the road.

5.4.4. External signage at venues must be limited to one sign per site. The sign must be of an appropriate size, attached directly to the building, and indicate that gaming machines are available on the premises. Advertising of prize money of any description must not be visible from outside the premises.

5.4.5. The gambling area of a venue must not have a separate entrance from the street, a separate name, or otherwise appear to be a separate activity from the primary venue.

5.4.6. Venues must have a host responsibility and gambling harm minimisation policy, as well as a staff training programme.

5.5. Relocation Policy

5.5.1. The Council allows the relocation of Class 4 gambling venues within the district, subject to the conditions set out in Section 5.3 and 5.4.

5.5.2. An existing venue within the district to which a Class 4 licence applies may be replaced by a venue at a new location. The proposed new location must comply with all other requirements of this policy.

5.6. Applications and Fees

5.6.1. All applications will be publicly notified and open for submissions for a period of 10 working days. The Hearings Committee will hear and decide all applications.

5.6.2. All fees and charges must be paid before any consent is granted. A deposit of $1,000 is required with hearing costs and disbursements charged monthly.

5.6.3. Councillor and staff time is charged at the rates specified in the Fees and Charges Schedule.

6. Links to Legislation, Community Outcomes and the District Plan

6.1. Legislation

- Gambling Act 2003 and regulations made under the Gambling Act 2003
- Local Government Act 2002

6.2. Community Outcomes

6.2.1. Effect is given to the principles of the Treaty of Waitangi.

6.2.2. Social

- Council commits to promoting health and wellbeing and minimising the risk of social harm in its communities.
- Public spaces are diverse, respond to changing demographics, and meet local needs for leisure and recreation.

6.2.3. Economic

- Enterprises are supported and enabled to succeed.
- There are sufficient and appropriate locations within the district for businesses to establish and operate.

6.3. District Plan

- Waimakariri District Council Partially Operative District Plan (2025)

7. Adoption, approval and date

Adopted by Waimakariri District Council on [Date Month] 2026.

8. Review date

[Date Month] 2029

9. Policy owned by

Manager, Planning and Regulation

Waimakariri District Council
215 High Street
Private Bag 1005
Rangiora 7440, New Zealand
Phone 0800 965 468

Totalisator Agency Board Venue Policy

1. Purpose

Sports and racing betting in New Zealand (NZ) is regulated by the *Racing Industry Act 2020* (the Act). The Act requires territorial authorities to adopt and periodically review a Totalisator Agency Board (TAB) Venue Policy.

This policy applies only to standalone TAB venues owned or leased by TAB NZ. It does not apply to TAB terminals located within privately owned premises, such as hotels, taverns, or clubs, as these may be established without territorial authority consent.

The policy provides a framework for the Waimakariri District Council (Council) to manage the availability and location of TAB venues and the growth of sports and racing betting activities within the district. This supports the Council's efforts to minimise gambling harm, including problem gambling.

This policy should be read in conjunction with the definitions provided in Section 3.

2. Policy Context

Section 93 of the *Racing Industry Act 2020* requires TAB NZ to obtain territorial authority consent before establishing a TAB venue.

A territorial authority is required to consider an application for consent in accordance with its TAB Venue Policy.

The Council adopted its first TAB Venue Policy in 2004 to meet the requirements of the Act. Section 97 of the Act requires the policy to be reviewed within three years of its last review. The policy remains in force even if it is due for review or is currently being reviewed.

The review process also provides an opportunity for community input through formal consultation, ensuring that any updated policy reflects community views and is appropriate for the district's needs and expectations.

At present, there are no standalone TAB venues in the Waimakariri District.

3. Definitions

Council means the Waimakariri District Council

District means the Waimakariri District

Harm:

(a) means harm or distress of any kind arising from, or caused or exacerbated by, a person's gambling; and

(b) includes personal, social, or economic harm suffered—

(i) by the person; or

(ii) by the person's spouse, civil union partner, de facto partner, family, whānau, or wider community; or

(iii) in the workplace; or

(iv) by society at large

Problem gambler:

A person whose gambling causes harm or may cause harm

TAB New Zealand or TAB NZ:

The body established by section 54 to conduct racing betting, sports betting, or other racing or sports betting under the Racing Industry Act 2020.

TAB venue:

Premises owned or leased by TAB NZ and where the main business carried on at the premises is providing racing betting, sports betting, or other racing or sports betting services under the Racing Industry Act 2020

4. Policy Objectives

4.1. To control the availability and location of standalone TAB venues within the district.
4.2. To control the growth of sports and racing betting within the district.
4.3. To minimise harm to the community arising from TAB gambling, including problem gambling.
4.4. To enable those who wish to participate in TAB gambling to do so safely and responsibly within the district.

5. Policy Statement

5.1. New TAB Venue Establishment Provisions

5.1.1. The Waimakariri District Council allows the establishment of new TAB venues within the district, subject to the requirements specified in this policy.

5.1.2. Since the Council's first TAB Venue Policy was adopted in 2004, no applications for consent to establish a new TAB venue have been received. Should the Council receive an application in the future, it will consider whether a district-wide cap is necessary to regulate the number of TAB venues permitted within the district.

5.2. Location-specific Restrictions for TAB Venues

5.2.1. TAB venues must not be located within a Residential Zone as defined by the Partially Operative District Plan 2025. These zones are:

- Large Lot Residential Zone
- Medium Density Residential Zone
- General Residential Zone
- Settlement Zone

5.2.2. Venues must not be located within the Kāinga Nohoanga or Pegasus Resort Special Purpose Zones. These zones include residential activities, and allowing gambling venues within them would undermine the special purpose and unique character of the zones.

5.2.3. Venues must not be on a site that the Council considers will unnecessarily display gambling activity to places and institutions primarily frequented by people under the age of 18 years.

5.3. Applications and fees

5.3.1. All applications will be publicly notified and open for submissions for a period of 10 working days. The Hearings Committee will hear and decide all applications.

5.3.2. All fees and charges must be paid before any consent is granted. A deposit of $1,000 is required with hearing costs and disbursements charged monthly.

5.3.3. Councillor and staff time is charged at the rates specified in the Fees and Charges Schedule.

6. Links to Legislation, Community Outcomes and the District Plan

6.1. Legislation:

Racing Industry Act 2020

Local Government Act 2002 (related to decision making and consultation)

6.2. Community Outcomes:

Effect is given to the principles of the Treaty of Waitangi

6.2.2. Social:

- Council commits to promoting health and wellbeing and minimising the risk of social harm to its communities
- Public spaces are diverse, respond to changing demographics and meet local needs for leisure and recreation

6.2.3. Economics:

- Enterprises are supported and enabled to succeed
- There are sufficient and appropriate locations where businesses can set up in our district

6.3. Other Relevant Council Documents

Waimakariri District Council Partially Operative District Plan 2025

7. Adoption, approval and date

The TAB Venue Policy was adopted by Waimakariri District Council on [Date Month 2026].

8. Review date

[Date Month 2029]

9. Policy owned by

Manager, Planning and Regulation

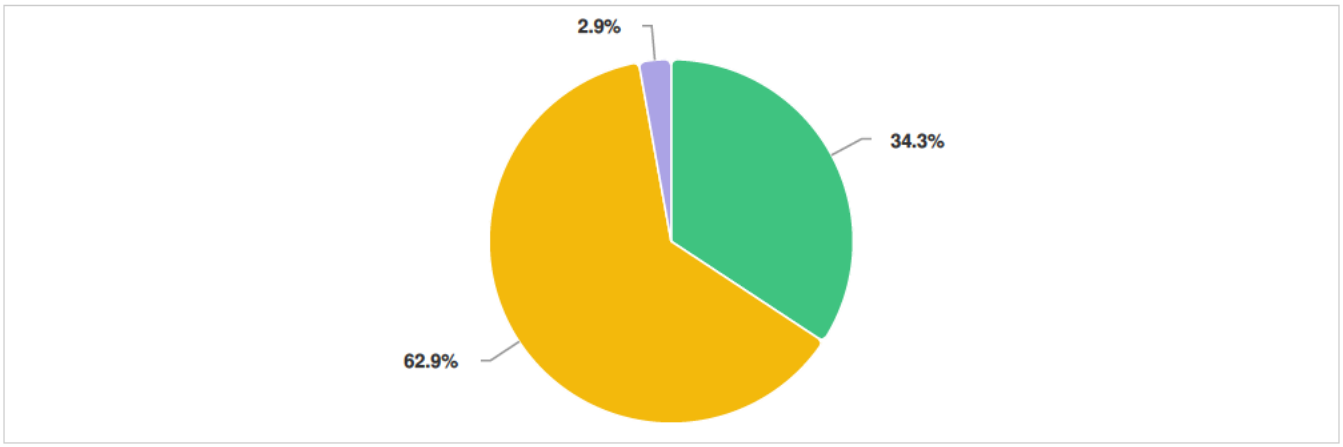
Waimakariri District Gambling Policies Survey

SURVEY RESPONSE REPORT
08 September 2026 - 16 October 2026

PROJECT NAME:
Gambling Policies

GRANICUS

Q1. Do you think the Council should continue to allow new Class 4 gambling venues within the district, subject to the location restrictions specified in the draft policy?



Question options	responses	%
Yes	24	34.3
No	44	62.9
Don't know	2	2.9

Optional question · 70 responses · 0 skipped
Question type : Radio Button Question

Q2. Please tell us the reason for you answer above

[redacted] 9/08/2026 05:47 PM	Because we already have more than enough gambling facilities. We don't need any more social harm that they cause.
[redacted] 9/16/2026 09:38 PM	Gambling is addictive and many who participate can least afford it. Fewer opportunities rather than more is my preference
[redacted] 9/17/2026 08:41 AM	No, there is already plenty of locations
[redacted] 9/21/2026 10:13 AM	The population in increasing and availability of gambling opportunities should mirror that growth. Class 4 gambling provides tangible benefit to the community.
[redacted] 9/21/2026 01:52 PM	
[redacted] 9/23/2026 02:20 PM	They are a blight on society.
[redacted] 9/23/2026 02:22 PM	No, gambling, especially slot machines , have no benefit and simply take money from the easily influenced. They're actively harmful to society. Imo, casinos aren't as bad because some of their games are partly skill based, and they're centralised in one location. You go to a bar to drink, you go to a casino to gamble, they shouldn't be mixed.
[redacted] 9/23/2026 02:26 PM	No. No good comes from gambling, at all, ever.
[redacted] 9/23/2026 02:31 PM	Honestly the last thing this community needs
[redacted] 9/23/2026 02:35 PM	
[redacted] 9/23/2026 02:35 PM	Gambling is terrible for families and the individuals,
[redacted] 9/23/2026 02:36 PM	
[redacted] 9/23/2026 02:36 PM	I am totally against gambling. If people want to gamble, they can do so at home online. I'm opposed to public gambling outlets altogether.
[redacted] 9/23/2026 02:47 PM	Enough if not to many gambling opportunities already
[redacted] 9/23/2026 02:48 PM	Gambling should not be expanded, it preys on the weak in the hope of riches.
[redacted] 9/23/2026 02:49 PM	There are no positives in relation to gambling. We should be restricting it, not increasing it.
[redacted] 9/23/2026 02:50 PM	Gambling should be discouraged. The reasons are obvious and well known
[redacted] 9/23/2026 03:00 PM	
[redacted] 9/23/2026 03:03 PM	Gambling affects the most vulnerable people in our community so a sinking lid policy is what I would prefer.

[redacted]
9/23/2026 03:10 PM

There re sufficient venues alreadyt

[redacted]
9/23/2026 03:20 PM

[redacted]
9/23/2026 03:28 PM

Gambling is an addiction, it ruins families and in the majority the only winners are the machines (where they are housed) The council should take a massive lead here and stop even considering it. However if they fail to heed the call, then it comes to a vote All councillors and Mayoral team who are involved in the vote should be named as for or against so come the next election the people of Waimak can see how responsible their representatives are

[redacted]
9/23/2026 03:51 PM

[redacted]
9/23/2026 03:52 PM

I support allowing new Class 4 gaming venues in the Waimakariri District, provided they operate under the strict controls and harm minimisation measures outlined in the Council's policy. While gambling can have negative impacts for some individuals, Class 4 gaming venues also deliver significant benefits to local communities through the distribution of grants to sports clubs, community organisations, cultural groups, and charitable initiatives. Many community groups rely on this funding to deliver programmes, maintain facilities, purchase equipment, and create opportunities for local residents. The Council's review of the policy recognises both the benefits and potential harms associated with gambling and seeks to maintain an appropriate balance between the two.

As Waimakariri continues to grow, there is merit in allowing appropriately located and well-regulated gaming venues that contribute to the local economy and help retain community funding within the district. New venues are subject to clear policy requirements regarding location, licensing, and suitability, ensuring that gambling activity remains a secondary component of hospitality venues rather than their primary purpose. Allowing carefully managed growth in the sector provides adults with access to regulated entertainment options while generating funding that can be reinvested directly into community wellbeing, sport, recreation, and social development across the distric

[redacted]
9/23/2026 04:01 PM

I like to play the pokies
But- had a son in law who gambled away his marriage. There is too much advertising of TAB on tv.
Stick with existing number of pokies- down size number if opportunity arises.

[redacted]
9/23/2026 04:11 PM

We already have gambling establishments where liquor is served and this is totally unethical bearing in mind the liquor licencing act is so strict. When people are under the influence of alcohol they are more likely to gamble way more than they can afford its unacceptable to put that temptation in peoples way. Online gambling is readily available and causing harm to families and the community

[redacted]
9/23/2026 04:24 PM

Fairness to new communities

[redacted]
9/23/2026 05:04 PM

There are plenty already

[redacted]
9/23/2026 05:54 PM

Not interested in gambling hard earned money away

[redacted] 9/23/2026 06:00 PM	Because there is a big problem for those who cannot manage their money there are enough gambling outlets now without increasing the supply
[redacted] 9/23/2026 06:18 PM	Gambling is as bad as using drugs, its side effects cause family and social harm. Can involve a criminal element
[redacted] 9/23/2026 06:29 PM	I don't approve of gambling
[redacted] 9/23/2026 06:52 PM	Causes poor/addicted people to lose money - need to stop it.
[redacted] 9/23/2026 08:02 PM	Only in a replacement of one if one is removed
[redacted] 9/23/2026 08:12 PM	Gambling adds nothing to a communittee, it adds risks to vunerable people. I feel it degrades a communittee by feeding addiction problems
[redacted] 9/23/2026 09:09 PM	
[redacted] 9/23/2026 09:25 PM	The evidence of the harm caused by gambling is clear and evidenced. The amount of money being removed from our residents is significant relative to the value contributed to the economy. The income of the people in our community is low - only 10% earning over $100k. In the current climate of cost of living crisis, many are finding it challenging to survive. In times of stress people look for opportunities to escape or make a quick buck. Gambling makes many lives worse - well beyond the person with the addiction. I personally identified fraud in a business driven by a gambling addiction and that person went to jail, the business was harmed financially and the impact on other staff (not to mention his family) was wide spread. This was not a reported problem gambler who would appear in statistics. This was hidden. The social impact report wildly understates the impact of problem gambling. I also was personally impacted by a young person (under 18) with a gambling addiction and it destroyed family relationships as well as causing financial harm. The benefits quoted are overstated eg staffing is minimal. The work is light touch and unlikely to result in incremental headcount changes. These people are performing other roles. There is very little social benefit to gambling. These people sit focused on the screen with limited engagement with those in the room. Kids are fascinated by these gambling rooms - the colours, the screens and the noise. It is completely wrong. Cigarettes aren't allowed pictures, colours, branding and must be hidden now. Do the same with these machines - black and white screens, minimal graphics, no sound effects, no jackpot signs. We cannot allow this to continue simply because community bodies rely on funding. Relying on the monies generated from the financial harm inflicted on others is not an acceptable answer. That's like saying that we can't ban smoking because the government relies on the tax income.
[redacted] 9/23/2026 09:25 PM	Because people should be free to spend their money as theyvwish
[redacted] 9/23/2026 09:29 PM	Awful harm to a close family member. Very destructive.
[redacted] 9/23/2026 09:47 PM	Not necessary to have any more

[redacted] 9/24/2026 02:45 AM	It is too easy for people to gamble away money they cannot afford
[redacted] 9/24/2026 07:27 AM	
[redacted] 9/24/2026 09:09 AM	Gambling is a net negative to people and the economy
[redacted] 9/24/2026 09:39 AM	Any gambling is harmful.
[redacted] 9/24/2026 12:02 PM	Its a personal choice to use facilities such as these and the grant funding opportunities for the wider area clubs and schools will be a positive to ensure that teams, clubs and schools can access resources, attend tournaments etc. as a result of gaming machine grant funding.
[redacted] 9/24/2026 08:58 PM	Gabling is addictive and as such damages families and wider society.
[redacted] 9/24/2026 11:50 PM	Because Gambling is another harmful addiction that creates family violence and abusive relationships within our communities. It takes money away from families and people starve and go without everyday needs in order for people to support their addiction.
[redacted] 9/24/2026 11:54 PM	Obviously the council has evaluated the lesser of the 3 levels under consideration. Not a great supporter of the vagaries of gambling it is realised that the councils proposal is better than it going underground and then attached to gangsterism .
[redacted] 9/25/2026 07:57 AM	I don't gamble, I have never put a bet on a horse, or it would be at least 60 years since put a coin in a pokies machine, but I would sometimes buy a Lotto ticket about six times a year
[redacted] 9/25/2026 09:29 AM	There's enough already Every pub and club has them don't need more
[redacted] 9/25/2026 11:31 AM	Gambling brings many sins in our society people.
[redacted] 9/25/2026 12:37 PM	We don't need any more gambling venues. Most gambling sites can be accessed online.
[redacted] 9/26/2026 08:26 AM	Retaining the current policy with only minor administrative updates fails to address the ongoing social and financial harm caused by Class 4 electronic gaming machines (pokies) in our communitPokies are widely recognized as the most damaging form of venue-based gambling. Western Australia demonstrates the power of this approach, where banning suburban pokie machines—restricting them solely to Perth's central casino—has successfully protected local communities and drastically reduced neighborhood gambling harm. Maintaining existing venue caps allows high levels of machine density to persist indefinitely. I strongly urge the Council to adopt a strict Sinking Lid Policy (with no relocation or merging permissions), ensuring that as venue licenses surrender or lapse, total machine numbers across the Waimakariri District systematically and permanently decrease over time to protect local families and vulnerable residents. Follow Perths example and take the lead in protecting our community members, it can be done and it has a good long- term impact.
[redacted] 9/26/2026 05:05 PM	As long as the venues used continue to be monitored for the correctness and legality of their operations and that the profits continue to back to the local community for social improvements and gambling awareness

[redacted] 9/28/2026 01:09 PM	The Gaming machines give a lot of fun and pleasure to the majority of users. The proceeds from the machines are a significant help to many local sporting groups and others.
[redacted] 9/29/2026 12:34 PM	Gambling can become addictive. All gaming machines and online gambling platforms are highly designed to engage and reward gambling with the use of noises and icons etc, that can be difficult for a person to disengage from. People seldom leave a gaming platform wishing they had spent more time or money there! They usually leave feeling regret and shame. Recreation facilities other than gambling can be more positive for the community
[redacted] 9/29/2026 02:53 PM	Gambling never does a community any good.
[redacted] 9/29/2026 03:23 PM	It is important that the local council has the authority to decide on class 4 venues and numbers of machines as it knows best the size and needs of a fast growing area.
[redacted] 9/30/2026 06:33 PM	Yes, I think any person above 22 years should be able to gamble, if they are willing to do so.
[redacted] 10/01/2026 02:23 PM	I think gambling is an issue and no more places should be open.
[redacted] 10/03/2026 12:45 PM	Good to have a variety of entertainment in a growing district.
[redacted] 10/06/2026 03:01 PM	Yes, I think we have the balance right with the numbers of venues & machines available
[redacted] 10/07/2026 01:04 PM	
[redacted] 10/12/2026 02:00 PM	
[redacted] 10/13/2026 06:03 PM	NPHS-Gambling harm is a significant public health issue that affects not only individuals who gamble, but also their families, whānau, and wider communities. Gambling harm may include physical and mental health impacts, family violence, relationship breakdown, disruptions to work or study, financial hardship, and crime. These harms are often linked to financial stress, social isolation, and family conflict, which compound over time and reduce wellbeing. Recent national data show that gambling harm is widespread. One in five New Zealand adults are affected by gambling harm at some point in their lives, either through their own or others' gambling.
[redacted] 10/14/2026 09:49 AM	Retaining the current policy allows for growth and ensures that gaming remains a safe, responsible, and enjoyable form of entertainment for residents, while currently contributing an annual benefit of $1,956,866 to the Waimakariri community. Please refer to the New Zealand Community Trust Submission for further details.

[redacted]

10/14/2026 11:07 AM

Gambling is a popular form of entertainment that most New Zealanders participate in. Any reduction in the local gaming machine offering may have unintended consequences,
as this may simply lead to a migration of the gambling spend to offshore internet- and mobile-based offerings. While it is illegal to advertise overseas gambling in New Zealand,
it is not illegal to participate in gambling on an overseas-based website or mobile phone application.

Please refer to the Gaming Machine Association Submission for further details.

[redacted]

10/14/2026 11:16 AM

Reducing machine numbers has not reduced gambling harm. Over the past decade, machine numbers have dropped by 25%, yet problem gambling rates have plateaued. Restrictive policies risk reducing community funding and accelerating the migration of gambling spend to online gambling.

Please refer to Kiwi Gaming Foundation submission for further details.

[redacted]
10/14/2026 12:22 PM

Unlike many councils, Waimakariri does not have a sinking lid policy. Relocations are allowed, meaning machines can move into new neighbourhoods, potentially increasing exposure and harm in vulnerable communities.
As national and regional services for the prevention and minimisation of gambling harm in Aotearoa New Zealand, PMGH have first-hand experience supporting gamblers and affected others in navigating the impact that harmful gambling has had on their lives.
It is estimated that about one in five people in New Zealand will experience harm in their lifetime due to their own or someone else's gambling.2 The impact of harmful gambling is diverse, affecting multiple domains of health and wellbeing, including physical, social, emotional, and mental health. However, according to the Ministry of Health client intervention data, only nine clients were assisted in the Waimakariri District in the 2022/23 financial year.

It is important to note that the Ministry of Health's Strategy to Prevent and Minimise Gambling Harm states that "needs assessment and outcomes monitoring reports show that only 16% of potential clients for gambling support services (that is, people whose reported harm results in a moderate to high PGSI score) actually access or present at these services", and that this low service use is also evident for other forms of addiction.3
While the Ministry of Health's client intervention data is not an accurate measure of the prevalence of gambling harm in New Zealand, it can tell us the rate of harm from different classes of gambling amongst those who have sought help. Data for 2022/23 shows that of the 4,411 individuals who received full intervention support for their own or someone else's gambling, 1,986 (45.0%) were for Class 4 EGMs.
Moreover, gambling harm disproportionately impacts Māori and Pacific peoples, and these populations have been identified in the Ministry of Health's Strategy to Prevent and Minimise Gambling Harm 2022/23 to 2024/25 as bearing a burden of harm that greatly outweighs that being experienced by other groups.
The 2020 Health and Lifestyles Survey results indicated that Māori were 3.13 times more likely to be moderate-risk or high-risk gamblers than non-Māori and non-Pacific peoples, and Pacific peoples were 2.56 times more likely to be moderate-risk or high-risk gamblers than non-Māori and non-Pacific peoples.5 According to the 2023 Census, 9.9% and 1.6% of Waimakariri District's population are Māori and Pasifika, respectively. Consideration of how Class 4 gambling inequitably impacts these groups must be deliberated and addressed.
Please refer to the Prevention Minimisation of Gambling Harm Territorial Local Authority Policy Working Group Submission for further details.

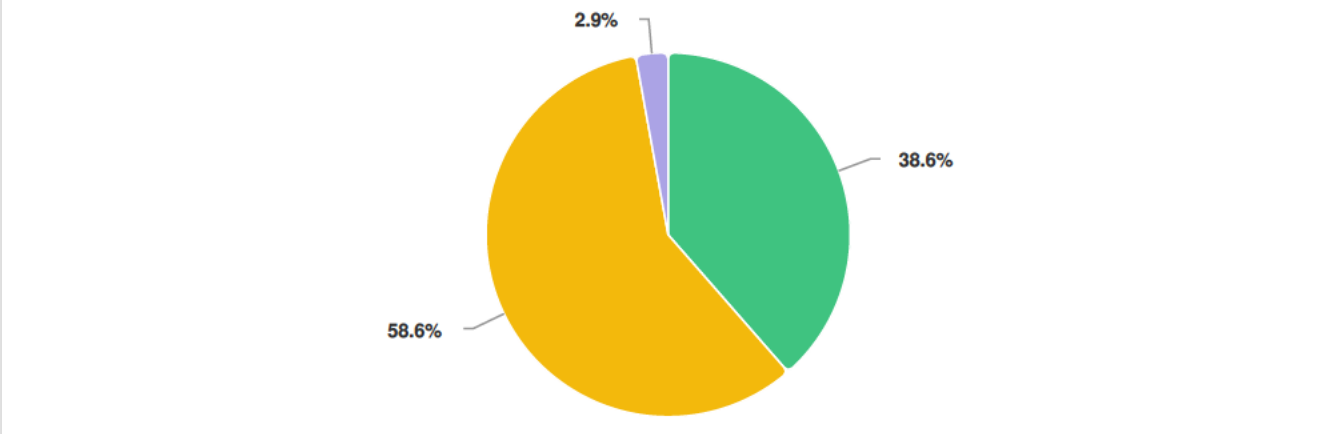
[redacted]
10/16/2026 02:36 PM

Accepts new venues under the current policy framework but seeks stronger restrictions on their location and approval. For example, the submission recommends exclusion zones and harm-minimisation measures, including preventing venues from being located near sensitive sites such as schools, churches, social service providers, and areas of high socio-economic deprivation. It also supports using harm mapping and deprivation data to guide decisions and prevent venue clustering.

Please refer to Whitiora submission for further details.

Optional question · 60 responses · 10 skipped
Question type : Essay Question

Q3. Do you support continuing the current per capita cap of one electronic gaming machine (EGM) per 260 residents aged 18 years and over to manage the number of EGMs in the district? Please note that this is equivalent to 38 EGMs per 10,000 residents aged 18 years and over



Question options	responses	%
Yes	27	38.6
No	41	58.6
Don't know	2	2.9

Optional question · 70 responses · 0 skipped
Question type : Radio Button Question

Q4. Please tell us the reason for your answer above.

[redacted] 9/08/2026 05:47 PM	Because we already have too many. If anything the numbers should be reduced.
[redacted] 9/16/2026 09:38 PM	I'd prefer a slowly sinking lid approach.
[redacted] 9/17/2026 08:41 AM	Should be less
[redacted] 9/21/2026 10:13 AM	It sets a limit on the overall availability of gaming machines which is sensible and is based in logical reasoning.
[redacted] 9/21/2026 01:52 PM	
[redacted] 9/23/2026 02:20 PM	As above
[redacted] 9/23/2026 02:22 PM	I would only support 0 (outside casinos anyway).
[redacted] 9/23/2026 02:26 PM	The appropriate amount of EGMs is zero. They are carefully designed by corporations to be as addictive and predatory as possible.
[redacted] 9/23/2026 02:31 PM	Too high per cap
[redacted] 9/23/2026 02:35 PM	
[redacted] 9/23/2026 02:35 PM	Electronic gambling machines should be banned
[redacted] 9/23/2026 02:36 PM	There should be more
[redacted] 9/23/2026 02:36 PM	Already stated above. Don't encourage gambling.
[redacted] 9/23/2026 02:47 PM	Gambling causes harm for so many of our communities and so should be kept to a minimum
[redacted] 9/23/2026 02:48 PM	We have them but dont need to grow them.
[redacted] 9/23/2026 02:49 PM	No, the number should be reduced.
[redacted] 9/23/2026 02:50 PM	Keep reducing the cap
[redacted] 9/23/2026 03:00 PM	
[redacted] 9/23/2026 03:03 PM	See above
[redacted] 9/23/2026 03:10 PM	
[redacted] 9/23/2026 03:20 PM	Costs out weight the benefits. Work on a reduction policy - trimming the numbers at each venue by say 1 per year. Increase by say 50 per year.

[redacted]

Lower it, see above

I support allowing new Class 4 gaming venues in the Waimakariri District and continuing the current policy of one gaming machine per 260 residents aged over 18 years. I believe this approach provides a sensible balance between harm minimisation and the significant benefits that Class 4 gaming funding delivers to local communities. Community grants generated through gaming machine proceeds provide vital support for sports clubs, community organisations, arts groups, and charitable initiatives, many of which would struggle to access alternative sources of funding at the same level. The current policy framework also ensures that gaming venues are subject to appropriate regulatory controls and location requirements, helping to manage potential social impacts while still allowing community organisations to benefit from funding generated locally.

As Waimakariri continues to experience population growth, maintaining the current ratio of one machine per 260 adults is a practical and measured approach that allows gaming opportunities to grow proportionately with the community rather than imposing arbitrary restrictions. Retaining this per capita provision helps ensure that community grant funding keeps pace with the needs of a growing district while supporting local hospitality venues and maintaining consumer choice for adults who choose to participate in this form of entertainment. I believe the existing policy has struck an appropriate balance between controlling gambling growth and preserving the substantial community benefits that gaming machine funding provides, and therefore I support its continuation.

Need go reduce mumber if pokies

We have more than enough access to gambling online

It's enough gambling is a social issue.

Gambling is often addictive and harmful to the individual and their families, not just in a financial way. Aim to lessen the number over time.

As previous

As stated above they are bad news people get addicted

The ratio should be decreased

I don’t approve of gambling

Causes poor/addicted people to lose money - need to stop it. They are programmed to be addictive, with an expected return of 0.9, so are guaranteed in the long term to lose all money.

There is no need to encourage more gambling by providing more venues. If one is interested in gambling, the venues that provide that are in ample supply

[redacted]

I think it is a reasonable ratio

The harm report has recommendations from all gambling harm organisations that a sinking lid policy is recommended and there seems to be reference to evidence around this.
This has been ignored by the draft policy.
Make positive change for the community and adopt a sinking lid policy.

Doesn't make a difference if there is 1 machine or 100 in a venue

Any EGM is too many. They do no good.

I think that this is to many EGM.

There is no need to have more

No we could make it so there are more per person

AS much cap as possible

S.2.

I assume that by advocating for the initial questions this question serves to be the other side of the coin. Again while these machines can have a negative impact to select members of society this is a personal choice, same as going to the pub or buy vapes, smokes etc. addictive but not compulsory...

I do not support there being any gambling machines.

The less machines the less opportunities for people to gamble. I personally think the number of machines per venue should be lowered and the times they operate.

See above

Have no knowledge of how they work out

Per capita isn't relevant to the harm
It just ads more places for gambling addiction as the region grows
Makes more harm

Gambling machines will destroy life of society residents.

Don't increase the number of EGMs. I wouldn't mind if the number was decreased.

[redacted]

We need to replace these machines with real community activities especially for our elderly and young people, The existing Waimakariri policy caps pokie machines based on a ratio (e.g., 1 machine per 260 adults). Because Waimakariri (Rangiora, Kaiapoi, Pegasus, Rolleston area) is experiencing steady population growth, this population-based cap allows new gaming machines to be added to the district as the resident population grows. Removing population-tied increases entirely and replacing them with a strict numerical cap or a Sinking Lid Policy. Growth in resident numbers should not automatically create room for additional pokie licenses.

It appears that the number of gaming machines per head of population is about right

The per capita rate should be increased to allow venues the ability to have a variety of games and be able to introduce new games. Need greater use of machines to have greater proceeds for local sporting groups. Lotto outlets are more blatant in their positioning and advertising which takes money out of the Community.

The human brain does not mature fully until age 25. Addictions and behaviours formed earlier in life are more difficult to modify and change as they become the normal behaviour for the young person. The minimum age for gambling should be 25 years

People waste their hard earned money on these machines. Times are going to get tougher soon with a world wide depression.

This policy is working very well and enables the council the space to add venues as required in this growing community.

See my answer for question number 2. I also think this capped 38 EGM per 10000 residents isn't preventing people to gamble.

I no not think there should be an increase

Yes I think the number of machines is about right.

Clubs New Zealand supports the Council's proposal to retain the existing Class 4 Gambling Venue Policy with only minor administrative amendments. We believe the draft policy appropriately balances the need to minimise gambling-related harm while recognising the legitimate role that Class 4 gaming plays in supporting valuable community outcomes.

[redacted]

10/13/2026 06:03 PM

NPHS Te Waipounamu strongly recommends that Council implements a sinking lid policy. As stated in our previous feedback, we recommend that Council adopts a sinking lid policy that bans the establishment of any new Class 4 venues in the district.
A sinking lid policy gradually reduces the number of gaming venues and machines overtime by restricting new licenses and replacements. A sinking lid policy is one of the most effective policy interventions available to reduce the number of pokie machines, expenditure on pokie machines and the associated gambling harm.21 Gambling availability is a key driver of gambling participation and expenditure, therefore, maintaining a sinking lid approach remains important to reduce exposure and associated harm.
By adopting a sinking lid policy, Waimakariri District Council would join the growing number of local authorities adopting sinking lid policies. Currently, over half (55%) of councils in Aotearoa New Zealand have adopted a sinking lid policy. Councils that implement sinking lid policies have seen reductions in the number of gaming machines, venues, and overall Class 4 gambling expenditure.
Our primary recommendation is to adopt a sinking lid policy. If Council decides not to adopt a sinking lid, we recommend introducing an absolute cap of 163 Class 4 gaming machines. This would maintain the current number of Class 4 gaming machines in the district and prevent any growth in the Class 4 gambling ecosystem.
We do not support the proposal to maintain the per capita cap on gaming machines in the district. The maximum number of permitted machines has increased in the proposed policy because the Waimakariri population has grown. Currently, there are 163 machines in Waimakariri, and the proposed policy allows up to 197 machines, meaning the number of machines could grow by 34. This is almost a 20% increase in the number of gaming machines and could lead to increased gambling opportunities and therefore more gambling harm.

[redacted]

10/14/2026 09:49 AM

Supports retaining the current cap because it allows for controlled growth while maintaining gaming as a regulated and responsible form of entertainment.
Provides significant community benefits, with gaming grants contributing approximately $1.96 million annually to the Waimakariri community.
Problem gambling rates in New Zealand are low, and the vast majority of people gamble without experiencing serious harm.
The Class 4 gaming sector is heavily regulated, with strict harm minimisation requirements, staff training, and funding for problem gambling services.
A sinking lid policy is unlikely to reduce gambling harm, as people may shift to online gambling, which has fewer controls and does not provide community grants.
Reducing gaming machines could threaten community funding for local non-profit organisations and community groups.
Gaming venues provide social and entertainment benefits that online gambling does not.
Supports evidence-based regulation rather than restrictive policies, arguing that current controls effectively manage risks while preserving community benefits.

Please refer to the New Zealand Gaming Trust submission for further details.

[redacted]

[redacted]:07 AM

The current cap is reasonable given the current environment of high regulation, Waimakariri's population growth, and the expansion of online gambling.
There is no direct correlation between gaming machine numbers and problem gambling rates. Over the last 15 years, the problem gambling rate has remained static, despite gaming machine numbers declining by over 25%.
The 2012 National Gambling Survey7 concluded that the prevalence of problematic gambling reduced significantly during the 1990s and has since stayed about the same.
Adopting a more restrictive policy is unlikely to reduce problem gambling, but will, over time, reduce the amount of funding available to community groups based in Waimakariri District. Reducing gaming machine venues reduces casual and recreational play, and therefore reduces machine turnover and the amount of money generated for grant distribution. However, problem gamblers are people who are addicted to gambling. If a new bar is established and the policy prevents that bar from hosting gaming machines, a
person who is addicted to gambling will simply travel the short distance to the next bar that has gaming machines, or worse, may move to another form of gambling such as offshore-based internet and mobile phone gambling.

Please refer to the Gaming Machine Association Submission for further details.

[redacted]

10/14/2026 11:16 AM

Kiwi Gaming Foundation receives grant requests that exceed the amount of local funding generated. Retaining a policy that allows for a small amount of additional growth will help to keep the current level of community funding sustainable and avoid an even higher level of funding unavailability.
The population-based cap is reasonable given the significant community funding that is generated from the gaming machines, the positive economic impact of the machines, and the growth of online gambling.

Please refer to Kiwi Gaming Foundation submission for further details.

[redacted]

10/14/2026 12:22 PM

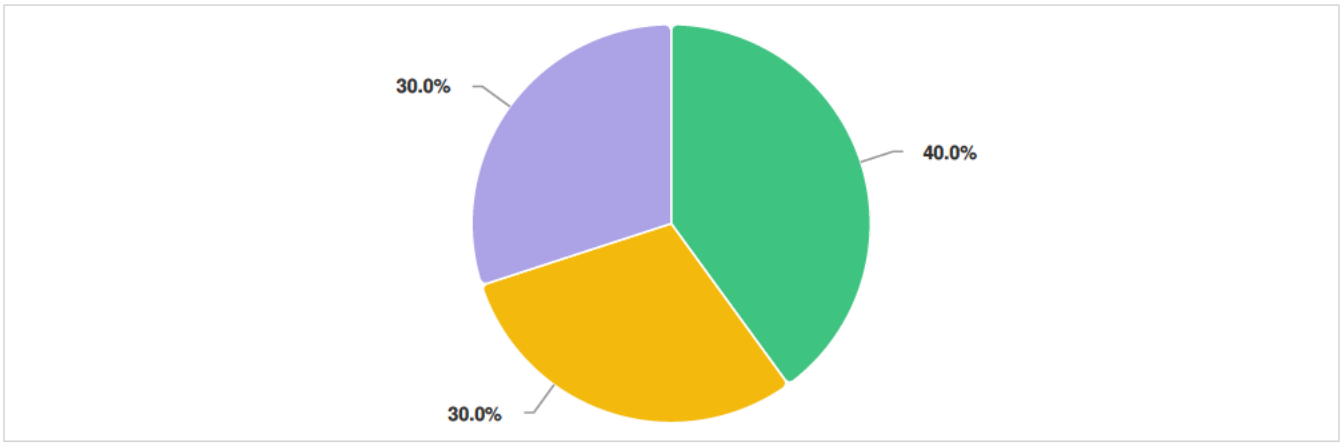
We note that Council's proposal to retain its current per capita policy could lead to a significant increase in pokie machines.
There are currently 163 machines in Waimakariri District. The proposed policy would allow a maximum of 197 - an increase of 34 machines. Therefore, there is potential for the number of machines to grow by almost 20%, which is a significant increase.
Population growth does not create an automatic case for more pokies. Per-capita formulas make sense for infrastructure with clear social utility – more people create demand for schools, housing, transport and health services. Pokie machines are fundamentally different: they are a high-risk, high-harm product. There is no equivalent social need to maintain one machine for every 260 residents.
The 1:260 ratio should therefore be a ceiling, not a target continually replenished as Waimakariri grows. If population increases while machines remain at 163, falling machine density is a harm-minimisation gain – not a problem Council needs to correct.
The question is not whether we can prove precisely how much harm another 30+ machines will cause. What evidence demonstrates Waimakariri needs another 30+ machines in the first place?

Please refer to the Prevention Minimisation of Gambling Harm Territorial Local Authority Policy Working Group Submission for further details.

[redacted] 10/16/2026 02:36 PM	Support continuation of the existing policy framework, subject to stronger safeguards and monitoring. Although the current per-capita cap is supported, it is not considered the preferred approach, as it allows an increase in the number of EGMs. Please refer to Whitiora submission for further details.

Optional question · 62 responses · 8 skipped
Question type : Essay Question

Q5. The current policy allows Class 4 gambling venues to be relocated under certain conditions. Do you think the current relocation rules should remain the same?



Question options	responses	%
Yes	28	40.0
No	21	30.0
Don't know	21	30.0

Optional question · 70 responses · 0 skipped
Question type : Radio Button Question

Q6. Please tell us the reason for your answer above.

[redacted]

There is no good reason to change.

Prefer a sinking lid, so relocation requests are an ideal time to sink the lid!

Allowing relocations maintains a consistent level of community funding. Legislation prevents new venues from operating more than 9 gaming machines. Venues licensed before October 2001 possess "grandfather" entitlement to operate up to 18 gaming machines. Generally speaking, those venues are the workhorses of the sector, generating larger amounts of community funding.
Events such as fire, earthquake, lease expiry and demolition fall outside of an operator's control, yet they can have a devastating effect on their business. That damage is exacerbated in situations where an operator loses the ability to continue operating a significant portion of their business.

If you close, you close. End of story.

Abolish them

I prefer Option 2 of the gambling amendments.

I have no problem with the status quo just growth.

Yes - provided there is no increase in availability or visibility

There’s not enough information provided here to explain what’s intended.

Relocation requires the new location to fully comply with the policy.

Need the places to be set away from garages and supermarkets to be a controlled centre for the Lotto and a similar set up to cover PRIVATE clubs only

I support retaining the ability for Class 4 gaming venues to be relocated, subject to appropriate conditions and Council approval. Relocation provisions provide flexibility for venue operators when circumstances change, while ensuring that any new location remains suitable and complies with policy requirements. This approach allows gaming activity to be moved to more appropriate premises where necessary, without increasing the overall number of gaming machines or undermining the policy's harm minimisation objectives. As Waimakariri continues to grow, maintaining both the current machine-to-population ratio and sensible relocation provisions will help ensure that community funding remains available to support local sport, recreation, community development, and charitable activities across the district

Don't relocate. Reduce number if pokies

Its more than enough considering the availability of online gambling advertised on tv contantly

Rules seem sensible now.

I think it would be better to have no relocation permitted and to have a sinking lid policy.

As above

Get rid of them all

I don’t approve of gambling

Shouldn’t be allowed anywhere

Fair to relocate if the venue is suitable and meets the council’s standards

I don't have a full understanding of the current rules

I believe all gambling harm organisations recommended against this. Why is this ignored?

Not sure

These should not be allowed to be relocated

Not sure of repercussions

If they have it they should not have it taken away from just relocation

S. 2.

Only if they were to stay within the same catchment area etc. again this comes back to the accessibility of grant funding opportunities.

I do not believe we need gambling venues in Waimakariri

Less places to game the better

Nor sure since it sounds somewhat too accommodating

We should be looking at keeping gambling where it is,relocating is a good opportunity to decrease gambling

We do to need gambling everywhere

I'm a gambler even i think there's too much temptation

Gambling machines should be withdrawn in our region.

I am unsure of the regulations for these.

No relocation, If a venue shuts down or moves, the licence to operate those pokie machines should expire completely rather than being transferred to a new suburban location. Explicitly incorporating Deprivation Index mapping into planning rules. Council should prohibit any new or relocated venue within high-deprivation meshblocks or within a set radius (e.g., 200–500 metres) of pawnshops, quick-loan lenders, or social service providers.

Sometimes, venues no longer meet the licensing criteria required, for whatever reason. It needs to be made fairly straightforward under those circumstances to be able to shift to appropriate vetted venues

[redacted]

Current rules are far too restrictive,

There should be a grandfathering policy for venues. As one venue closes, the license should be cancelled

I don't support gambling in any shape.

Sometimes this is necessary and venues should not be unfairly penalized.

I don't know what a class 4 gambling venue is.

As long as there are conditions

NPHS-We note that the current policy allows Class 4 venues and machines to relocate. We recommend that Council either bans relocations or prohibits relocations to areas with high levels of socioeconomic deprivation (e.g. deprivation deciles 7 to 10). Allowing the relocation of Class 4 gambling can contribute to the concentration of venues and machines in deprived areas, and potentially expose new communities to Class 4 gambling.

The status quo relocation policy is sensible and should be retained. A workable relocation provision allows venues to move to more suitable premises, protects operators from onerous lease terms, and supports re-establishment following unforeseen disruptions such as fire or natural disaster.

It is noted that changes to the existing relocation policy fall outside the scope of this consultation. Any such changes would therefore require a separate consultation process.

Please refer to the Gaming Machine Association Submission for further details.

The Foundation notes that changes to the current relocation policy fall outside the scope of this consultation.

Allowing relocation means the pokie footprint can shift into new areas, potentially increasing gambling-related harm.

Please refer to the Prevention Minimisation of Gambling Harm Territorial Local Authority Policy Working Group Submission for further details.

[redacted]
[redacted]

We support the:
•inclusion of an additional criterion restricting the relocation of venues and EGMs within areas of high socio-economic deprivation at a minimum,
reinforcement of strict exclusion zones around high-deprivation areas, schools, churches, social service providers (including violence prevention and mental health and addiction support services),
•
use of harm mapping and socio-economic data to guide location decisions and prevent new venues from being established in areas already at higher risk of experiencing gambling harm,
•
prohibition of venue clustering within a specified radius (e.g., 1–2 km) to avoid the oversaturation of gambling venues in any one community.
Please refer to Whitiora submission for further details.

Optional question · 49 responses · 21 skipped
Question type : Essay Question

Q7. Is there anything else Council should consider when making decisions about the Draft Class 4 Gambling Venue Policy?

[redacted]

The harm that gamvling causes.

Not that comes to mind.

Gaming is incredibly addictive (by design), and harmful.

Destroying families of those who gamble

There should be more

The possibility of greater harm.

Lotto - this is a serious problem. Access should be reduced.

While possibly not do-able under the legislation, EGM proprietors should be required to distribute at least half of their net proceeds to community organisations in the local area.

[redacted]

Forget their memberships of the places thst house gambling units

Before any change thought needs to be given to the impact a reduction in venues/machines would have on the community services and charity space. Unfortunately they rely on the proceeds of this industry. Any change needs to consider how in the longer term the community is able to resource these vital community groups that with out them both local and central government would need to find ways to maintain the services they provide.

Overall, I support retaining the current Class 4 Gaming Venue Policy, including the provision of one gaming machine per 260 residents over the age of 18 and the ability for venues to relocate under approved conditions. The existing policy provides an appropriate balance between minimising gambling harm and enabling substantial community benefits through grant funding. As Waimakariri continues to grow, maintaining these settings will help ensure local sporting, cultural and community organisations continue to receive vital financial support while gambling activity remains subject to strict regulatory controls and Council oversight. The current policy appears to be working effectively and does not require more restrictive measures at this time.

As above. Remove gambling establishments from places that supply liquor

Just commonsense please

The provision of support to problem gamblers and their families. Is it available and easily accessible locally

No

How many families will be affected by it

The social harm, inequality, mental health issues

Reasonable connsideration for residents and possible vunerable groups

Be brave - make a positive change for our community. There are other ways for organisations to get grants - yes it is hard but the community will adapt.

[redacted]

Stop limiting people's choices. No matter what the number of machines is or the limit of money you can win etc.. even if there is only 1 machine people will still gamble the same… restrictions dont solve anything

Down with easy access to gambling

Gambling is not good for a healthy community.

Gambling should not be the prime activity of a venue

S. 2.

-

Gambling is addictive and as such damages families and society.

Not having gambling machines at places where the drug alcohol is sold or drunk.

As long as it can contain / debar the obsessive punters / those that can leat afford it

Reduce the harm do t make it easier

Please abolish gambling system and activities in our society.

Proximity to schools and venues frequented by young adults.

Strengthening exclusion zones around schools, early childhood centres, playgrounds, sports fields, and public libraries to ensure pokie venues and TAB outlets are completely isolated from family-centric areas.

Giving proper weight to feedback from health organizations, social services, and problem gambling treatment providers (such as the Problem Gambling Foundation and Te Ngāi Tūāhuriri Rūnanga) who consistently advocate for stronger harm-reduction policies over administrative status-quo options.

Lotto outlets should be under the same rules

[redacted]

The overall impact of gambling in the community is negative- time and money wasted for very little return to the community in the way of community grants. Sadly, many of the individuals who gamble the most are the ones who can least afford it. This brings harm to dependent and often vulnerable children in their care

Please don't increase what is already there.

The current venues are very well run and with Harm minimization requirements and the care we show our patrons this policy should not be used as a tool to stop this social activity which is well managed and controlled. By limiting the growth in a community it could have the opposite affect of it being to busy and unmanageable with to many patrons. As long as the funds are used to promote growth and positive outcomes in the future.

I can't think of any.

Protecting the vulnerable. Not having obvious advertising. Providing resources to help with addition

Would be nice to have more support around technology eg the Players Information which is pre programed breaks where the machine will freeze up & give the player information on time & money spent in that playing session on the screen... (Length of Play) these breaks could give different information or even short videos & the break in play should be longer as the length of play increases. *** the length of play is not always link to one player... its based on how long the machine has been used... EG, I could have been playing for 30 mins, then you use this machine for 30 mins... the machine would think that's its the same player for 60 min. I believe there would need to be a 60 sec break in play for the machine to re set the information.

We own a Restaurant with gaming machines...the rules around TAB & Lotto are.
TBA offers FREE Bonus cash with some of their adverts & cash backs if you do not win on some of their promotions... The over slight on Lotto with online gaming is pretty relaxed.

I think that the rules around Class 4 gaming are pretty tough. I would not like to see them loosen, would be nice to see an even playing field.

We currently use a POI system, where we have over 100 excluded players. It is not reasonable to have our staff recognise and know as soon as these players are in the gambling room. Facial recognition would help with harm minimisation and efficiency of our staff to achieve this.

No need to be heard by the hearing panel, but if there is any questions or extra information needed, please feel free to email.

[redacted]

10/07/2026 01:04 PM

Please advise why there is a restriction of only 1 external sign on a site when the venue may encompass 2 large outside walls, i.e. the venue is situated on a corner.

[redacted]
[redacted]00 PM

While Clubs New Zealand supports the proposed policy, we encourage Council to recognise that not all Class 4 venues operate under the same ownership and governance model.

Member-based clubs operate on a fundamentally different basis to commercial hospitality venues. Clubs are governed by elected committees, exist for community benefit, and reinvest surpluses into facilities, services and activities that support their members and the wider community.

For this reason, Clubs New Zealand encourages Council, to consider including definitions or explanatory provisions that recognise the unique nature of club-licensed premises. This would provide greater clarity should matters such as venue relocations, amalgamations or club mergers arise in the future.

[redacted]
[redacted] PM

NPHS-As highlighted in the Social Impact Assessment, there are 163 pokie machines across 11 venues in the Waimakariri District, and the number of venues and machines has decreased over time between 2005 and 2025, following a similar pattern to the national picture.

Gaming Machine Profits (GMP) were approximately $10.4 million in the Waimakariri District in the year ending December 2025. This equates to approximately $28,500 being lost per day to Class 4 gambling in the district. GMP has continued to grow in the district in recent years; increasing from approximately $9.9 million in 2023 to $10.3 million in 2024.

GMP is all the money generated through the use of Class 4 gambling, less the amount paid back as prizes. The figure of $10.4 million is the money that was lost in 2025, so the total money spent on gaming machines was actually much higher when winnings are considered.

In the Waimakariri District, the majority of Class 4 gaming machines and venues are in areas with moderate to high socioeconomic deprivation (deciles 7 to 10). Out of the 11 venues in the district, 7 are in deprivation deciles 7 to 10.

The concentration of venues in deprived communities highlights the inequitable exposure of socioeconomically deprived communities to gambling. Problem gambling is three times higher in deprived neighbourhoods when compared with those in the lower deprivation quintiles.13 This is reflected in the significantly higher gambling expenditure in deprived areas when compared to more affluent ones. For example, people living in the most deprived areas spend on average up to three times more on Class 4 gambling than those in the least. deprived areas. This is particularly important in the context of Waimakariri District, where currently most of the gaming venues and machines are located in moderate or high deprivation areas.

While the Gambling Act requires at least 40% of net proceeds to be returned to community purposes, there is no legislative requirement that these funds are redistributed to the communities from which they were generated. Of the $10.4 million lost in Waimakariri District in 2025, only $1,956,866 (approximately 19%) was returned to organisations based in Waimakariri District.

[redacted]

10/14/2026 09:49 AM

[redacted]

10/14/2026 11:07 AM

The Association has sought independent legal advice (copy attached) from Brookfields Lawyers regarding gambling venue policy conflicts. In summary, the key advice is:

• Being a member of a club or organisation that receives funding from a gaming grant will not usually give rise to conflict of interest when it comes to deciding or discussing Council's gambling venue policy, unless that member holds a paid role (e.g., a coach who is paid for that service); and

• Where an elected member, outside of a debate on the issue, has expressed a view on the gambling venue policy that suggests that they do not and cannot have an open mind on the matter, this could give rise to a conflict of interest on the grounds of predetermination.

Please refer to the Gaming Machine Association Submission for further details.

[redacted]

10/14/2026 11:16 AM

In 2025, Kiwi Gaming Foundation made grants totalling $605,976 to Waimakariri District-based community groups.1
The total amount of gaming machine funding to Waimakariri District-based community groups in 2025 totalled $1,956,868.
Gaming societies are the only gambling operators that consistently support grassroots organisations. Other gambling providers, including Lotto NZ, TAB NZ, land-based commercial casinos, and offshore online platforms, do not provide comparable community funding.
There is no realistic alternative to this funding. The Council cannot replace millions of dollars in grants, and grassroots organisations cannot rely on central government or commercial sponsorship to fill the gap.
A 2022 survey by the Gaming Machine Association of New Zealand2 found:
• Over 92% of responders felt it was either impossible or very unlikely that Class 4 funding could be replaced by Government funding (i.e., subsidies or grants).
• Over 86% of responders felt it was either impossible or very unlikely that Class 4 funding could be replaced by funding from other charitable trusts.
• Over 89% of responders felt it was either impossible or very unlikely that Class 4 funding could be replaced by funding directly from community members.

The 2021 TDB Advisory report5 found that gambling in New Zealand delivered a net positive wellbeing impact of between $1.74 billion and $2.16 billion annually.

Online gambling is growing rapidly. The 2020 Health and Lifestyle Survey found that 1 in 4 adults gambled online, with 19% doing so weekly.
Online gambling is problematic because:
• No funds are currently generated for local community grants.
• Very little tax revenue is generated for the New Zealand Government.
No funding is currently provided to problem gambling treatment services; i.e., no problem gambling levy is currently paid.
• No local employment is created.
• It is highly accessible (people can gamble from the privacy of their own bedroom, 24 hours a day, 365 days a year).
• It has a high speed of play.
• There are no bet size restrictions.
• There are no venue staff to provide supervision, advice, and support.
• It is easily abused by minors.
• There is no guaranteed return to players.
• Excessive gambling is encouraged by the frequent use of inducements to gamble, such as player rebates and bonuses.

Please refer to Kiwi Gaming Foundation submission for further details.

[redacted]
10/14/2026 12:22 PM

Councils play an important role in addressing the harm caused by Class 4 gambling by adopting gambling venue policies which regulate the number and location of Class 4 pokies.

According to research conducted by the Auckland University of Technology's New Zealand Work Research Institute, sinking lid policies are among the most effective policies for reducing pokie spending and problem gambling expenditure by 13%. Moreover, territorial local authorities (TLAs) who adopted restrictions above and beyond those mandated by the Gambling Act 2003 experienced less gambling harm than those TLAs who did not.7 Currently, just over half (55%), or 36 councils in Aotearoa New Zealand, have adopted a sinking lid policy.

Please refer to the Prevention Minimisation of Gambling Harm Territorial Local Authority Policy Working Group Submission for further details.

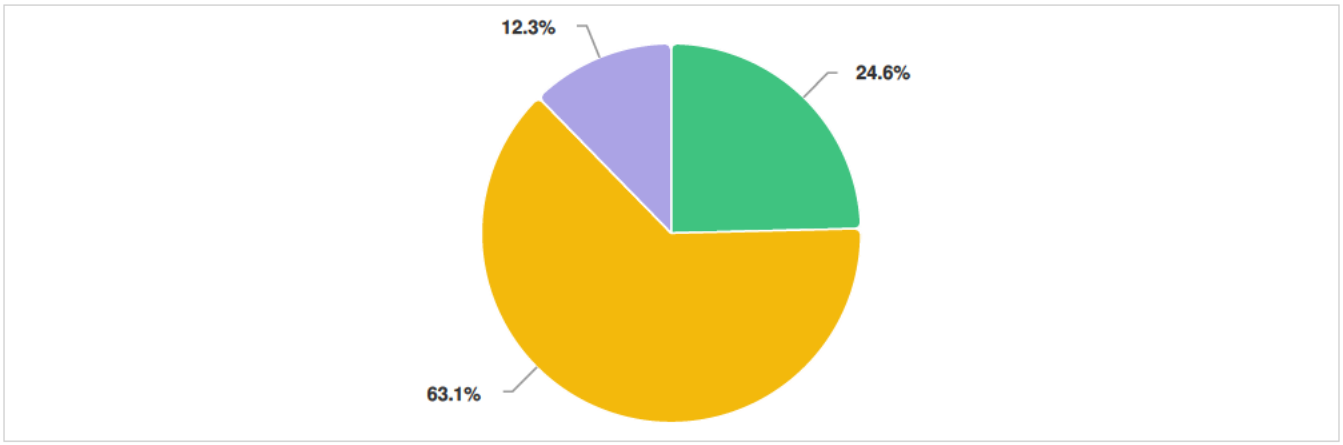
[redacted]
10/16/2026 02:36 PM

We support the:
• inclusion of an additional criterion restricting the relocation of venues and EGMs within areas of high socio-economic deprivation at a minimum,
•reinforcement of strict exclusion zones around high-deprivation areas, schools, churches, social service providers (including violence prevention and mental health and addiction support services),
•use of harm mapping and socio-economic data to guide location decisions and prevent new venues from being established in areas already at higher risk of experiencing gambling harm,
•prohibition of venue clustering within a specified radius (e.g., 1–2 km) to avoid the oversaturation of gambling venues in any one community.

Please refer to Whitiora submission for further details.

Optional question · 46 responses · 24 skipped
Question type : Essay Question

Q8. Do you think the Council should continue allowing new standalone TAB venues within the district, subject to the location restrictions specified in the draft TAB Venue policy 2026?



Question options	responses	%
Yes	16	24.6
No	41	63.1
Don't know	8	12.3

Optional question · 65 responses · 5 skipped
Question type : Radio Button Question

Q9. Is there anything else Council should consider when making decisions about the Draft TAB Venue Policy?

[redacted]

Same as previously stated, a sinking lid is my preference, no new venues/locations or numbers of options.

Not that comes to mind.

The most obvious harm is to addicted humans, but where TAB gets involved, there is also the vast animal cruelty of the racing industry. Greyhound racing was just banned for this reason, and horse racing is no less brutal. Eventually, people will look back on it the same way we do slavery and say - "why did they allow this to happen?" Why not get ahead of history and disallow them now?

TAB can be done online, no need for a venue

TAB is a business so it is required to grow to increase its base. It again preys on the weakest in society.

There are no positives in relation to gambling. We should be restricting it, not increasing it.

Keep outlets to a minimum

I see both sides here. Charities are dependent on gambling but that should change just as alcohol advertising has in sport.

[redacted]

Reduce them to two, plenty of empty spaces at the moment in Rangiora alone

I support retaining the existing TAB Venue Policy, including the ability for standalone TAB venues to operate within the district. I believe the current policy appropriately balances individual choice, regulatory oversight and harm minimisation, and does not require further restrictions at this time

Reduce Tab number. Reduce number liquor stores. Reduce number vape shops

As above

Don't know

No

Because they can do it online no need for more outlets

No need for bricks and mortar gambling venues as freely available online

We do not need a TAB in the community. Please protect our community.

I find it dumb that the nz government has banned off shore gambling sites. Just give the TAB the monopoly like the supermarkets

Gambling is not good for a healthy community.

[redacted]

N/a

-

I do not believe there should be any.

It's much more social than any pokie
It's better odds for the gambler ,so less wasted money
It also helps a huge industry of local workers
Gambling must be expelled in our region.

I oppose allowing any new standalone TAB venues in the Waimakariri District and strongly recommend that Council adopt a cap of zero standalone TAB venues. Commercial sports betting has shifted predominantly online; allowing new physical betting storefronts in local town centres unnecessarily normalises gambling for young people and creates everyday triggers for those experiencing gambling harm. As demonstrated in restricted jurisdictions like Perth, keeping dedicated gambling storefronts out of local suburban shopping areas protects community health and safeguards household financial well-being.

Racing is a large contributor to the local economy and a large employer.

Council should reduce all gambling venues.

Now that betting is online stand alone TABs are not really a growing area of business.

[redacted]

There's enough of these kiosks in the pubs in the Waimakariri already.

Please refer to the Prevention Minimisation of Gambling Harm Territorial Local Authority Policy Working Group Submission for further details.

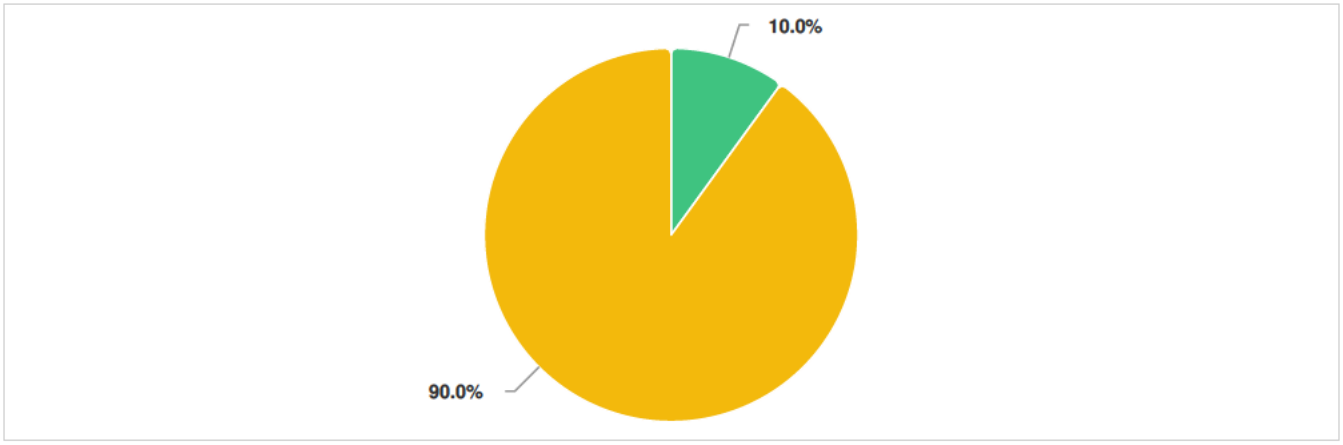
We consider that WDC should include the same protections offered for the Class 4 Venue Policy to this policy.

- Venue Density and Socio-Economic Deprivation advice,
- Māori Impact & Cultural Proximity advice, and
- Localised Evidence & Data gaps (should an application be consented).

Please refer to Whitiora submission for further details.

Optional question · 31 responses · 39 skipped
Question type : Essay Question

Q10. Would you like to be heard by the hearing panel regarding your submission?



Question options	responses	%
Yes	7	10.0
No	63	90.0

Optional question · 70 responses · 0 skipped
Question type : Radio Button Question

Feedback: Waimakariri District Council Review of the Class 4 Gambling Venue Policy and Totalisator Agency Board (TAB) Venue Policy.

Submitted by: Prevention Minimisation of Gambling Harm (PMGH) Territorial Local Authority (TLA) Policy Working Group.

On behalf of PMGH: Dr Charles Egwuba, Co-Chair.

September 2026

Introduction to PGF Services

PGF Services delivers gambling harm treatment and public health services nationwide. We provide free counselling, advice and support to gamblers and their families. Our organisation is a charitable trust operating nationally with services delivered under contract to Te Whatu Ora and funded from the gambling levy.

This is a joint feedback by the 'Prevention Minimisation of Gambling Harm (PMGH) Territorial Local Authority (TLA) Policy Working Group', which is a Te Waipounamu (South Island) Gambling Harm Collaborative Alliance (TIGA) of community gambling harm providers (**Problem Gambling Foundation Ltd** (PGF Services), **Purapura Whetū Trust, Asian Family Services, Te Kāika (Ōtākou Health), Te Piki Oranga, and Mapu Maia)**, working together to reduce gambling-related harm across Te Waipounamu.

Social Services Waimakariri has agreed in principle to support this submission, with 25 members agreeing to the submission and 6 abstaining due to conflicts of interest.

The feedback is in response to the council's Class 4 Gambling Venue Policy and Totalisator Agency Board (TAB) Venue Policy. As a working group, we are united by a shared purpose to provide public health and clinical services that contribute to the wellbeing of whānau and communities.

Class 4 Gambling

Class 4 gambling (pokies in pubs, clubs, and TABs) is the most harmful form of gambling in Aotearoa New Zealand.

As a continuous form of gambling, electronic gaming machines (EGMs or 'pokies') enable players to place hundreds of bets in a matter of minutes. You do not have to wait for the horses to finish a race, a roulette wheel to stop spinning, or for the weekly Lotto draw – just press a button and in mere seconds you have a result.

It is important to consider that all gambling is not the same. Although pokies are a legal form of entertainment in New Zealand, they are highly addictive and have been specifically designed to be very absorbing and encourage people to participate in continuous gambling.

Waimakariri District and Class 4 Gambling

As at December 2025, Waimakariri District had 11 Class 4 gambling venues and 163 gaming machines, a slight decrease from 165 machines earlier in 2025. The number of venues has remained stable for several years.

	Venues	Gaming Machines
Prior Quarter	11	163
Current Quarter	11	163
Δ	0	0
% Change	0.00%	0.00%

From June 2026, compared to the prior quarter, the number of gaming machines and venues in Waimakariri District has not changed.

Figure 1: Gaming Machines and Venues in Waimakariri District

Gaming Machine Profits (GMP)
The Waimakariri District continues to experience high levels of pokie losses. The December 2025 yearly recorded:

- **Rolling 12-month GMP:** $10,402,596.94 (up 1.0%)

These figure show a consistent upward trend in losses, despite a stable number of venues and machines. The June 2026 data confirms that GMP continues to rise, despite no growth in the pokie network.

Change Over Time

From March to December 2025, the number of gaming machines decreased slightly (–2 machines, –1.2%: 165 to 163), while venues remained unchanged. However, GMP continued to increase, indicating higher spending per machine and sustained demand for pokies.

The June 2026 quarter reinforces this trend: no change in venues or machines, yet GMP increased by nearly $182,000 in one quarter.

This pattern aligns with national evidence showing that even stable pokie networks can generate increasing losses over time.

Yearly GMP (Year Ending)

	Nominal		Inflation Adjusted	
Dec-2024	$10,300,736.70		$7,860,396.76	
Dec-2025	$10,402,596.94		$7,718,873.5	
Δ	$101,860.24	1.0%	-$141,523.26	-1.8%

Quarterly GMP

	Nominal		Inflation Adjusted	
Mar-2025	$2,402,816.33		$1,802,112.25	
Dec-2025	$2,773,652.38		$2,037,316.69	
Δ	$370,836.05	15.4%	$235,204.44	13.1%

Figure 2: Gaming Machine Profits (GMP) in Waimakariri District



Figure 3: GMP Per Quarter

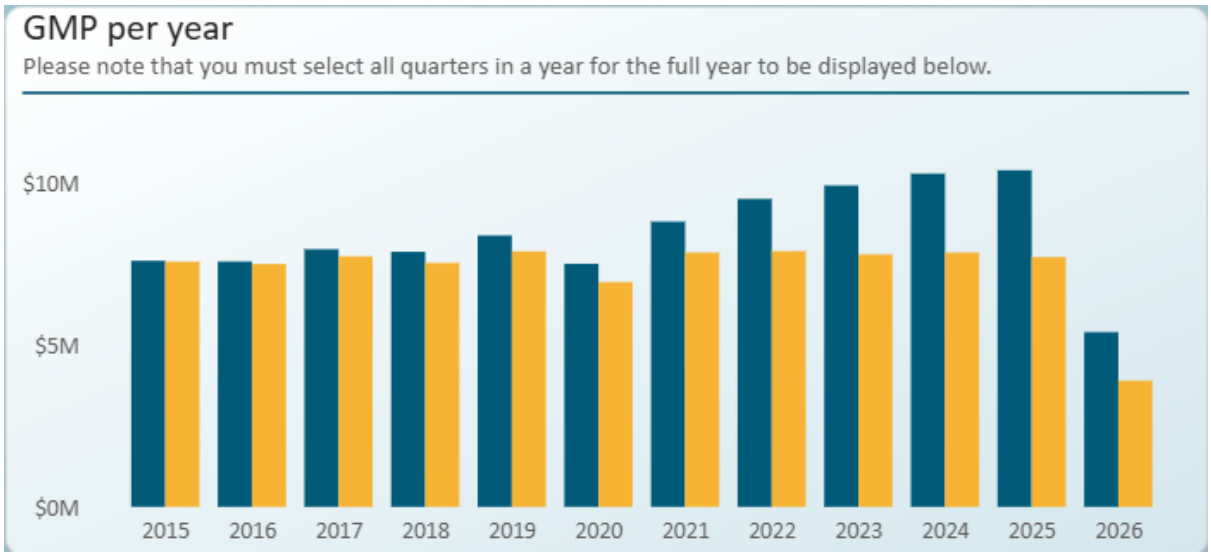


Figure 4: Waimakariri District GMP from 2015 to 2025 (DIA, 2026)

Society Name	Venue Type	Venue Name	Venue Physical Address	Count of EGM	Count of Jackpot
The Lion Foundation 2008	Tavern	Craft Bar and Kit	UNITS 3-4, KAIAPOI CROSSING, 77 HILTON STREET KAIAPOI CANTERBURY 7630	9	1
Kaiapoi Workingmens Club & M S A Inc	Non-Commercial: Workingmen's	Kaiapoi WMC an	113 Raven Quay KAIAPOI 7630	18	1
Kiwi Gaming Foundation	Tavern	Kaikanui Tavern	67 Williams Street KAIAPOI 7630	18	2
The Lion Foundation 2008	Tavern	Mainstreet Sport	37 HIGH STREET RANGIORA CANTERBURY 7400	18	2
Youthtown Incorporated	Tavern	MANDEVILLE TA	99 RAVEN QUAY KAIAPOI CANTERBURY 7630	9	1
Oxford Workingmens Club & MSA Inc	Non-Commercial: Workingmen's	Oxford Workingn	160 High Street OXFORD 7430	12	1
The Lion Foundation 2008	Tavern	PINEACRES RES	740 MAIN NORTH ROAD KAIAPOI CANTERBURY 7630	9	1
Aotearoa Gaming Trust	Hotel	Plough Hotel	398 High Street RANGIORA 7400	18	3
Rangiora Returned Services Association Club	Non-Commercial: RSA Club	Rangiora RSA Cl	82 Victoria Street RANGIORA 7400	18	1
Aotearoa Gaming Trust	Tavern	The Brook Bar ar	16 SOUTHBROOK ROAD RANGIORA CANTERBURY 7400	18	4
Kiwi Gaming Foundation	Tavern	Woodend Tavern	51 Main North Road Woodend, CANTERBURY 7610	16	1

Figure 5: Current Quarter Licensed Venues (DIA, 2026)

Gambling Harm, Deprivation and inequity

National-level evidence (Ministry of Health and DIA) shows that non-casino gaming machines (Class 4 pokies) are among the most harmful forms of gambling, with a high proportion of people experiencing low, moderate or severe harm.

Harm includes:

- Financial stress and debt
- Relationship breakdown
- Family violence
- Mental distress
- Reduced participation in work or study

Māori, Pacific peoples, and people living in high-deprivation areas are disproportionately affected. According to the Ministry of Health, only 16% of people experiencing moderate to high gambling harm ever access support services, meaning the true scale of harm is significantly under-reported.

In Waimakariri, the combination of:

- A stable but dense network of 11 venues,
- High annual losses exceeding $10.4 million,
- Concentration of venues in medium-high and high deprivation areas,

strongly suggests that a significant share of losses is coming from residents who can least afford it, with flow-on effects for whānau, local social services, and community wellbeing, and crucially that gambling harm is occurring at levels not reflected in service utilisation data.

The distribution of pokie venues in Waimakariri highlights a significant equity concern. According to the 2025 and 2026 deprivation analysis[1]:

- **64% of venues (7 out of 11)** are located in **medium-high or high deprivation areas**.
- **No venues** are located in low-deprivation neighbourhoods.

This mirrors national patterns where pokies are disproportionately concentrated in more deprived communities, contributing to higher levels of gambling harm among residents who can least afford financial losses.

The clustering of venues in medium-high and high-deprivation areas suggests that a substantial share of the district's $10.9 million annual losses comes from households experiencing greater financial vulnerability.

Policy Context in Waimakariri District

Waimakariri District Council's Class 4 Gambling Venue Policy (2022) sets out objectives to:

- Control the growth of gambling.
- Prevent and minimise harm caused by gambling.
- Allow responsible participation in gambling.

Key policy features include:

- A cap of **1 machine per 260 adults.**
- Restrictions on signage and visibility.
- Requirements for host responsibility policies.
- **Relocation of venues is permitted**, provided the new site replaces an existing venue and meets policy criteria.

Unlike many councils, Waimakariri does not have a sinking lid policy. Relocations are allowed, meaning machines can move into new neighbourhoods, potentially increasing exposure and harm in vulnerable communities.

Impact of Gambling Harm on the Community

As national and regional services for the prevention and minimisation of gambling harm in Aotearoa New Zealand, PMGH have first-hand experience supporting gamblers and affected others in navigating the impact that harmful gambling has had on their lives.

It is estimated that about one in five people in New Zealand will experience harm in their lifetime due to their own or someone else's gambling.[2] The impact of harmful gambling is diverse, affecting multiple domains of health and wellbeing, including physical, social, emotional, and mental health. However, according to the Ministry of Health client intervention data, only nine clients were assisted in the Waimakariri District in the 2022/23 financial year.

It is important to note that the Ministry of Health's *Strategy to Prevent and Minimise Gambling Harm* states that "needs assessment and outcomes monitoring reports show that **only 16%** of potential clients for gambling support services (that is, people whose reported harm results in a moderate to

[1] Gambling Group Regulatory Services (2026): Gaming Machine Profits (GMP) Quarterly Report – December 2026
[2] Ministry of Health, *Strategy to prevent and minimise gambling harm 2022/23 to 2024/25*. Wellington: Ministry of Health; 2022.

high PGSI score) actually access or present at these services", and that this low service use is also evident for other forms of addiction.[3]

While the Ministry of Health's client intervention data is not an accurate measure of the prevalence of gambling harm in New Zealand, it can tell us the rate of harm from different classes of gambling amongst those who have sought help. Data for 2022/23 shows that of the 4,411 individuals who received full intervention support for their own or someone else's gambling, 1,986 (45.0%) were for Class 4 EGMs.[4]

Moreover, gambling harm disproportionately impacts Māori and Pacific peoples, and these populations have been identified in the Ministry of Health's *Strategy to Prevent and Minimise Gambling Harm 2022/23 to 2024/25* as bearing a burden of harm that greatly outweighs that being experienced by other groups.

The 2020 Health and Lifestyles Survey results indicated that Māori were 3.13 times more likely to be moderate-risk or high-risk gamblers than non-Māori and non-Pacific peoples, and Pacific peoples were 2.56 times more likely to be moderate-risk or high-risk gamblers than non-Māori and non-Pacific peoples.[5] According to the 2023 Census, 9.9% and 1.6% of Waimakariri District's population are Māori and Pasifika, respectively.[6] Consideration of how Class 4 gambling inequitably impacts these groups must be deliberated and addressed.

Sinking Lid Policy

Councils play an important role in addressing the harm caused by Class 4 gambling by adopting gambling venue policies which regulate the number and location of Class 4 pokies.

According to research conducted by the Auckland University of Technology's New Zealand Work Research Institute, sinking lid policies are among the most effective policies for reducing pokie spending and problem gambling expenditure by 13%. Moreover, territorial local authorities (TLAs) who adopted restrictions above and beyond those mandated by the Gambling Act 2003 experienced less gambling harm than those TLAs who did not.[7] Currently, just over half (55%), or 36 councils in Aotearoa New Zealand, have adopted a sinking lid policy.

We, the PMGH, commend Waimakariri District Council for taking the time to undertake a robust community impact assessment and to engage with gambling harm organisations to gain an understanding of the full spectrum of harm that pokies cause. Waimakariri District Council does not currently have a sinking lid, and relocations are permitted. This means the pokie footprint can shift into new areas, potentially increasing harm.

[3] Ministry of Health. Strategy to prevent and minimise gambling harm 2019/20 to 2021/22. Wellington; 2019.
[4] Ministry of Health. *Gambling harm intervention services data.* Wellington: Ministry of Health; 2024. Retrieved from: https://www.health.govt.nz/our-work/mental-health-and-addiction/addiction/gambling-harm/service-user-data/gambling-harm-intervention-services-data
[5] Te Hiringa Hauora. Results from the Health and Lifestyles Survey 2020. Wellington: Te Hiringa Hauora; 2021.
[6] Statistics New Zealand. *2023 Census place summaries – Waimakariri District.* 2025. Retrieved from: Waimakariri District, Place and ethnic group summaries | Stats NZ
[7] Erwin C, Lees, K., Pacheco, G., & Turco, A. *Capping problem gambling in NZ: The effectiveness of local government policy interventions.* Auckland: New Zealand Work Research Institute.; 2020.

PMGH further commends the Council for its commitment to harm minimisation. We encourage the Council to strengthen its policy by adopting a **sinking lid with no relocations allowed**. This is the most effective approach available to reduce pokie expenditure and prevent harm.

Council's Proposal to Retain Current Per Capita Policy

We note that Council's proposal to retain its current per capita policy could lead to a significant increase in pokie machines.

There are currently 163 machines in Waimakariri District. The proposed policy would allow a maximum of 197 - an increase of 34 machines. Therefore, there is potential for the number of machines to grow by almost 20%, which is a significant increase.

Population growth does not create an automatic case for more pokies. Per-capita formulas make sense for infrastructure with clear social utility – more people create demand for schools, housing, transport and health services. Pokie machines are fundamentally different: they are a high-risk, high-harm product. There is no equivalent social need to maintain one machine for every 260 residents.

The 1:260 ratio should therefore be a ceiling, not a target continually replenished as Waimakariri grows. If population increases while machines remain at 163, falling machine density is a harm-minimisation gain – not a problem Council needs to correct.

The question is not whether we can prove precisely how much harm another 30+ machines will cause. What evidence demonstrates Waimakariri needs another 30+ machines in the first place?

Class 4 Gambling Community Grants

Class 4 Trusts and Societies are required to return 40% of the GMP to the community via grants or applied funding. However, it cannot be guaranteed that money lost to pokies in the district is returned to community groups in the same district, as there is no geographical mandate. For example, of the $10,402,596.94 lost in Waimakariri District in 2025, only $1,956,866 was returned as community grants.[8] This is around 18.81% of the amount lost in 2025. This means that over 80% of the money lost on pokies leaves the district, either to national trusts, operating costs, or other destinations, while the full social cost of harm remains local.

[8] Department of Internal Affairs. *Granted Dashboard - Grants by District.* Wellington: Department of Internal Affairs; 2025. Retrieved from: https://www.granted.govt.nz/dashboard.html

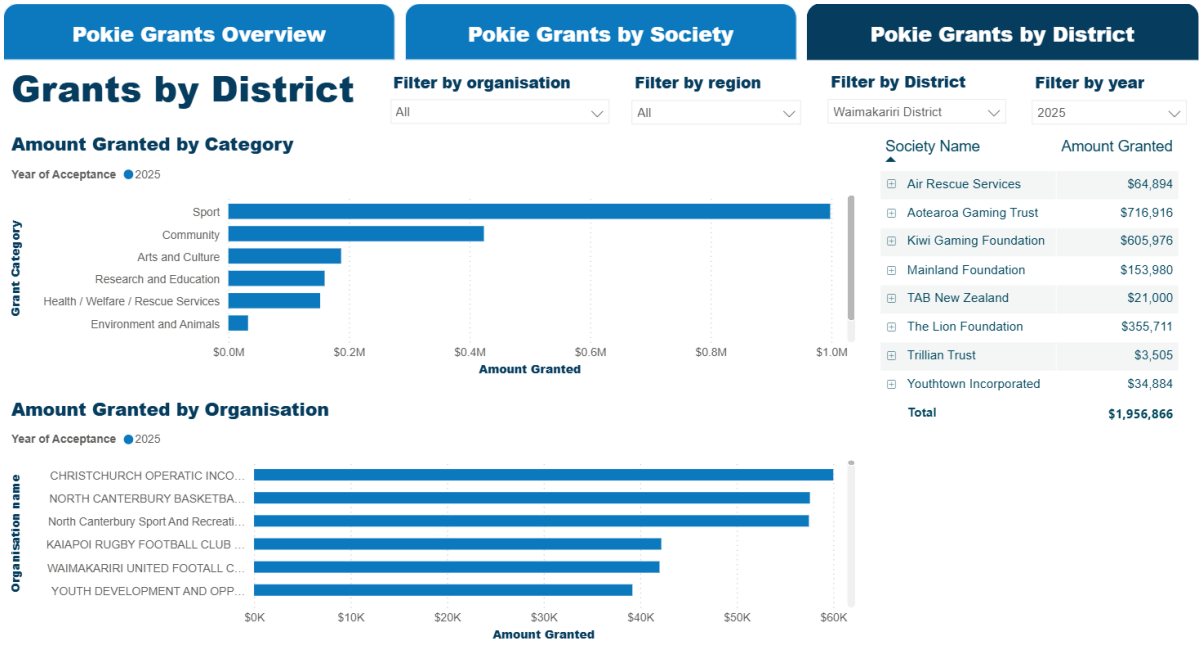


Figure 6: Community Grants Distribution Waimakariri District

While pokie grants may support local community groups, sports, and services, it is important to remember where the money is coming *from* rather than where the money is *going*. Evidence has repeatedly shown that the distribution of Class 4 gambling funds is inequitable, as funds are less likely to return to the communities in which they were raised. Reports from the Ministry of Health reveal that pokies in the most deprived areas provide over half of the total Class 4 gambling expenditure.[9] The Department of Internal Affairs (DIA) have also acknowledged that "this means that there is more exposure and access to pokie gambling, normalising gambling in communities who can least afford it and leading to gambling harm."[10]

As at March 2025, approximately 50 - 80% of Class 4 venues in Aotearoa New Zealand are located in medium-high or very-high deprivation areas. In Waimakariri District, "most venues are in areas with moderate to high socio-economic deprivation", if not 100%.[11]

A report commissioned by the DIA, *Assessment of the effects of Class 4 gambling on wellbeing in New Zealand,* revealed that "one of the most striking features of the data is that [qualitative and quantitative analyses] both indicate that Class 4 gambling tends to magnify community disadvantage. The evidence strongly suggests that it transfers wealth from more deprived communities to less deprived communities".

[9] Allen & Clarke. Informing the 2015 gambling harm needs assessment: Final report for the Ministry of Health. Wellington: Ministry of Health; 2015.

[10] Department of Internal Affairs. Reducing pokies harm – Public discussion document. Wellington: Department of Internal Affairs; 2022.

[11] Department of Internal Affairs. *Gaming machine profits (GMP Dashboard).* Wellington: Department of Internal Affairs; 2025. Retrieved from: Gaming Machine Profits (GMP) Dashboard - Dataset - data.govt.nz - discover and use data

Overall, there is a strong redistributive effect where less deprived communities (decile 1-5) provide **26% of the GMP but receive 88% of the grants**. Conversely, more deprived communities (decile 6-10) provide **74% of the GMP but receive only 12% of the grants**.[12]

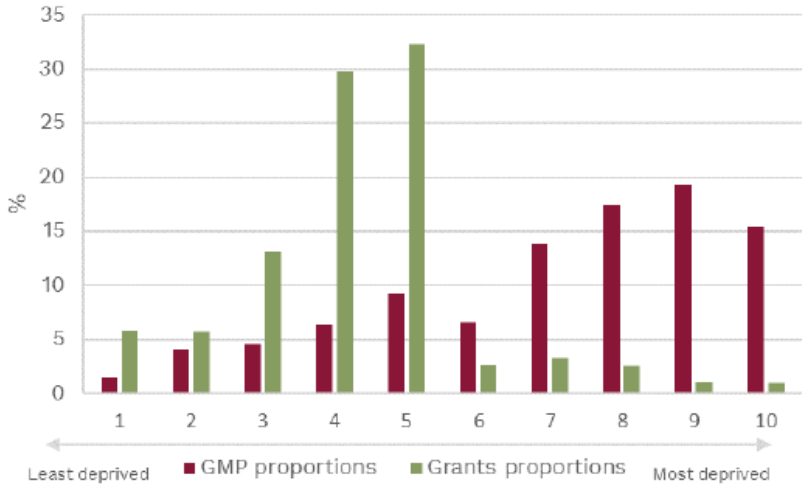


Figure 7: The origin of GMP and the destination of Class 4 grants by socio-economic decile (BERL, 2020)

Community grants have real value, but they do not establish a need for more machines. If additional community funding justifies expansion, we are effectively arguing for additional gambling losses to fund community activity.

We also challenge the suggestion that maintaining sporting and community funding requires maintaining or increasing local pokie density. The new regulated online casino regime provides for an amount equivalent to 4% of gross gambling revenue for community funding, alongside a 1.24% problem-gambling levy.

That does not make online gambling harmless. It demonstrates that community funding and local pokie density are separate policy choices.

[12] Cox M, Hurren K, Nana G. Assessment of the effects of Class 4 gambling on Wellbeing in New Zealand: Final Report. Wellington: Business and Economic Research Limited; 2020.

Signed by,



Charles Egwuba

Co-Chair – "The PMGH TLA Policy Working Group"

PGF Services



Mahlon Saumalu

Co-Chair – "The PMGH TLA Policy Working Group"

Te Huinga Kōtuku – Purapura Whetū

Hana Edwards-Craig

Member – "The PMGH TLA Policy Working Group"

Te Kāika (Ōtakou Trust)

Areposeta Timo

Member – "The PMGH TLA Policy Working Group"

Mapu Maia

Brenda McQuillan

Member - “The PMGH TLA Policy Working Group”

Te Piki Oranga

Health New Zealand
Te Whatu Ora

6 October 2026

Waimakariri District Council
215 High Street
Rangiora 7440

Tēnā koutou

Technical Advice on the Class 4 Gambling Venue Policy

1. This technical advice has been compiled by the National Public Health Service (NPHS) Te Waipounamu region, Health New Zealand – Te Whatu Ora. NPHS Te Waipounamu provides services to the South Island including Waimakariri District.

2. NPHS recognises its responsibilities to improve, promote and protect the health of people and communities of Aotearoa New Zealand under the Healthy Futures (Pae Ora) Act 2022 and the Health Act 1956.

3. Pae Ora requires the health sector to protect and promote healthy communities and health equity across different population groups by working together with multiple sectors to address the determinants of health.

4. NPHS is focused on the achievement of equitable health outcomes. We use the Ministry of Health – Manatū Hauora definition of equity:

> *In Aotearoa New Zealand people have differences in health that are not only avoidable, but unfair and unjust. Equity recognises different people with different levels of advantage require different approaches and resources to get equitable health outcomes.*[1]

5. We welcome the opportunity to comment on Council's Class 4 Gambling Venue Policy. This document reiterates feedback we gave in September 2025 during the early engagement phase of policy development.

6. Health and wellbeing are influenced by a wide range of factors beyond the health sector. These factors are often referred to as the 'social determinants of health', and can be described as the environmental, economic and social conditions in which people are born, grow, live, work, age and play.[2]

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1 Ministry of Health – Manatū Hauora (2024, July 2). Achieving equity. https://www.health.govt.nz/about-ministry/what-we-do/achieving-equity

2 Public Health Advisory Committee. (2004). The Health of People and Communities. A Way Forward: Public Policy and the Economic Determinants of Health. Public Health Advisory Committee.

7. The diagram[3] below illustrates that these determinants of health are complex and interlinked. Initiatives to improve health outcomes and overall quality of life must involve organisations and groups beyond the health sector, such as local government and businesses, if they are to have a collective impact.[4]

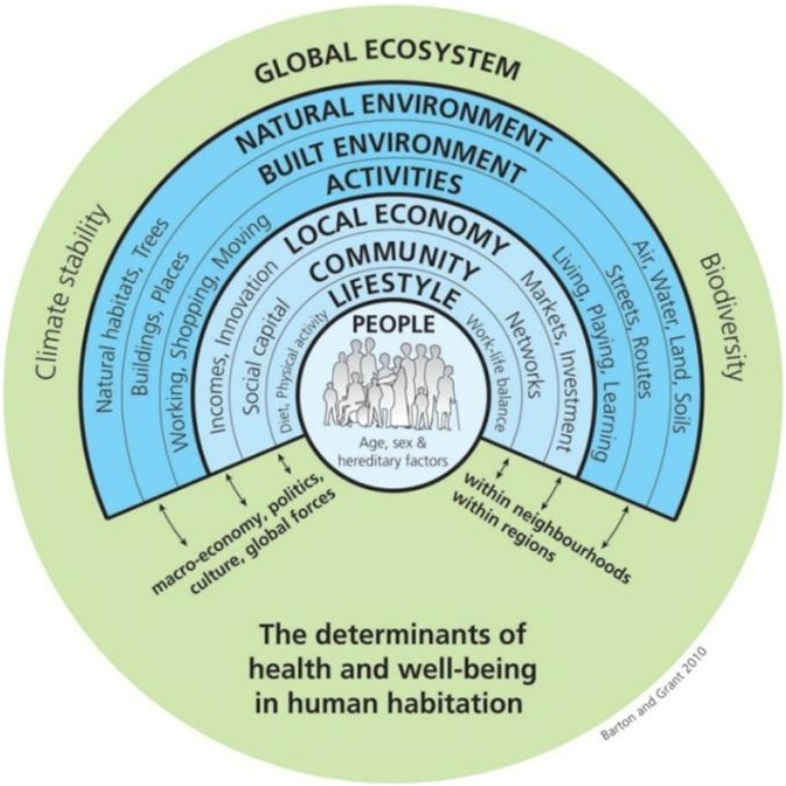


Figure 1: Social determinants of health

Gambling harm and health

8. As highlighted in our earlier advice, gambling harm is a significant public health issue that affects not only individuals who gamble, but also their families, whānau, and wider communities.[5] Gambling harm may include physical and mental health impacts, family violence, relationship breakdown, disruptions to work or study, financial hardship, and crime. These harms are often linked to financial stress, social isolation, and family conflict, which compound over time and reduce wellbeing.[6]

9. Recent national data show that gambling harm is widespread. One in five New Zealand adults are affected by gambling harm at some point in their lives, either through their own or others' gambling. The NZ Gambling Survey 2023/24 shows 8.3% of New Zealanders

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3 Barton, H. & Grant, M. (2006). A health map for the local human habitat. *The Journal of the Royal Society for the Promotion of Health, 126(6),* 252-253. https://journals.sagepub.com/doi/10.1177/1466424006070466

4 McGinnis J.M., Williams-Russo P. & Knickman JR. (2002). The case for more active policy attention to health promotion. Health Affairs, *21(2),* 78-93. https://www.healthaffairs.org/doi/abs/10.1377/hlthaff.21.2.78

5 Wardle, H., Reith, G., Langham, E., & Rogers, R. D. (2019). Gambling and public health: We need policy action to prevent harm. BMJ, 365, l1807. https://doi.org/10.1136/bmj.l1807

6 Browne M, Tulloch C, Dellosa G, et al. (2025). Economic and Social Costing of Gambling in Aotearoa New Zealand 2023-24. Wellington: Ministry of Health.

experienced some level of gambling harm in the past 12 months, including 2.4% at moderate or high risk.[7]

10. Gambling harm extends well beyond the person who gambles. An estimated 381,000 people report experiencing second-hand harm within their households or families. Importantly, harm is not limited to those identified as problem gamblers, as nearly 50% of all gambling-related harm is experienced by people considered low-risk gamblers.[7] This shows that gambling harm is both widespread and often less visible, reinforcing the need for a whole of population approach to prevention and harm reduction.

11. Gambling harm is not evenly distributed in New Zealand and disproportionately affects certain population groups. Māori, Pacific, Asian peoples, disabled people, and young people are all more likely to experience moderate-risk or problem gambling than the general population. National data show Māori and Pacific people are more than twice as likely, and disabled people over four times as likely, to experience harmful gambling.[7,8]

12. These inequities reflect broader social and structural factors, including socioeconomic deprivation. Many of the groups most affected are more likely to live in communities with higher exposure to gambling opportunities, particularly electronic gaming machines. Evidence shows that both gambling participation and expenditure are higher in more deprived areas, where the risk of harm is greater.[9] This demonstrates that gambling is not simply an individual choice, but a significant equity issue, where harm is concentrated among populations already experiencing disadvantage.

13. Class 4 gambling machines (pokies) are widely recognised as one of the most harmful forms of gambling in New Zealand. Pokies are strongly associated with harm because of their design and operating environments, which encourage continuous play, rapid repetition, and reinvestment of winnings. These features increase the likelihood of harmful and persistent gambling behaviour.[7]

14. In 2023/24, pokies accounted for $1,037 million or over one third of total gambling expenditure ($2,792 million).[10] Spending is also highly concentrated with around 37% of total gambling losses coming from just 14% of people who play gaming machines.[7] This reflects the intensity of pokie machine use and its strong link to gambling harm. This is further reflected in service data, where pokies are the primary form of gambling among people accessing gambling harm services.[11]

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7 Ministry of Health. (2025). Strategy to prevent and minimise gambling harm 2025/26 to 2027/28. https://www.health.govt.nz/system/files/2025-09/strategy-prevent-minimise-gambling-harm-2025-26-2027-28-online-v2.pdf

8 Russell AMT, Browne M, Hing N, Rockloff M, Newall P, Dowling NA, Merkouris S, King DL, Stevens M, Salonen AH, Breen H, Greer N, Thorne HB, Visintin T, Rawat V, Woo L. Electronic gaming machine accessibility and gambling problems: A natural policy experiment. J Behav Addict. 2023 Aug 18;12(3):721-732. doi: 10.1556/2006.2023.00044. PMID: 37594879; PMCID: PMC10562817.

9 Department of Internal Affairs. (2025). Gaming machine profits (GMP) Quarterly Report – December 2025. Retrieved 11 June 2026, from Microsoft Power BI.

10 Department of Internal Affairs. (n.d.). Gambling expenditure statistics. https://www.dia.govt.nz/gambling-statistics-expenditure

11 Ministry of Health. (n.d.). Gambling harm intervention services data. https://www.health.govt.nz/monitoring-statistics/statistics-and-data-sets/gambling-harm/gambling-harm-services-data

Class 4 gambling in Waimakariri District

15. As highlighted in the Social Impact Assessment, there are 163 pokie machines across 11 venues in the Waimakariri District, and the number of venues and machines has decreased over time between 2005 and 2025, following a similar pattern to the national picture.

16. Gaming Machine Profits (GMP) were approximately $10.4 million in the Waimakariri District in the year ending December 2025. This equates to approximately $28,500 being lost per day to Class 4 gambling in the district. GMP has continued to grow in the district in recent years; increasing from approximately $9.9 million in 2023 to $10.3 million in 2024.[12]

17. GMP is all the money generated through the use of Class 4 gambling, less the amount paid back as prizes. The figure of $10.4 million is the money that was lost in 2025, so the total money spent on gaming machines was actually much higher when winnings are considered.

18. In the Waimakariri District, the majority of Class 4 gaming machines and venues are in areas with moderate to high socioeconomic deprivation (deciles 7 to 10). Out of the 11 venues in the district, 7 are in deprivation deciles 7 to 10 (Figure 2).[12]

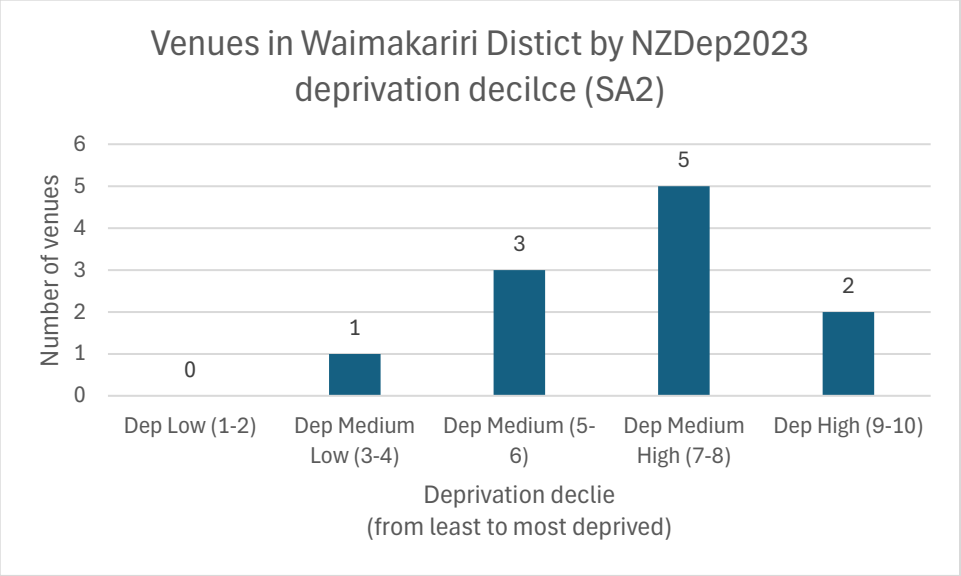


Figure 2: Class 4 gambling venues in Waimakariri District by NZDep2023 deprivation decile

19. The concentration of venues in deprived communities highlights the inequitable exposure of socioeconomically deprived communities to gambling. Problem gambling is three times higher in deprived neighbourhoods when compared with those in the lower deprivation quintiles.[13] This is reflected in the significantly higher gambling expenditure in deprived areas when compared to more affluent ones. For example, people living in the most deprived areas spend on average up to three times more on Class 4 gambling than those in the least

[12] Department of Internal Affairs. (2026). Gaming Machine Profits (GMP) Quarterly Report – June 2026. Retrieved 25 August 2026 from Microsoft Power BI.

[13] Pearce, J., Mason, K., Hiscock, R., & Day, P. (2008). A national study of neighbourhood access to gambling opportunities and individual gambling behaviour. Journal of Epidemiology and Community Health (1979-), 62(10), 862–868.

deprived areas.[14] This is particularly important in the context of Waimakariri District, where currently most of the gaming venues and machines are located in moderate or high deprivation areas.

Community grants

20. Gambling is often framed as providing community benefit through grant funding, and therefore it is argued that local gambling policies should be more permissive to return funding to the community. However, the evidence shows that only a small proportion of gambling revenue is returned to communities, with most revenue going towards venue operating costs.[15] This means the community benefits of gambling are often overstated and do not outweigh the significant harms.

21. Gambling also diverts household spending away from other goods and services. New Zealand research indicates that if Class 4 gambling expenditure were redirected into other sectors such as retail or local services, it could generate greater economic activity and support more sustainable employment.[16]

22. Importantly, gambling funding is derived from gambling losses, a significant proportion of which comes from individuals and communities experiencing harm. National evidence shows that a large share of gambling expenditure is generated by a relatively small group of users, many of whom are at higher risk of harm.[11]

23. While the Gambling Act requires at least 40% of net proceeds to be returned to community purposes, there is no legislative requirement that these funds are redistributed to the communities from which they were generated. Of the $10.4 million lost in Waimakariri District in 2025, only $1,956,866 (approximately 19%) was returned to organisations based in Waimakariri District.[12,17]

24. The proceeds of gambling generated in Waimakariri District may be distributed to communities outside the district, including at regional or national levels, while the social cost of Class 4 gambling remains local. Evidence shows that the distribution of Class 4 gambling funds is inequitable because much of this funding comes from the most deprived communities, while the recipients tend to be from more affluent communities. This transfer of wealth indicates that Class 4 gambling tends to magnify community disadvantage.[18]

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[14] Bellringer, M. E., Janicot, S., & Ikeda, T. (2024). Changes in some health and lifestyle behaviours are significantly associated with changes in gambling behaviours: Findings from a longitudinal New Zealand population study. Addictive Behaviors, 149.

[15] Francis, L., & Livingstone, C. (2020). Gambling's community contributions: Does the community benefit?. Addiction Research & Theory, 28(5), 365-378. https://doi.org/10.1080/16066359.2019.1663834

[16] Hogan, S., & Siddharth, P. (2020). The retail employment and tax costs of Class 4 gambling in New Zealand. New Zealand Institute of Economic Research. https://www.nzier.org.nz/hubfs/Public%20Publications/Client%20reports/final_report_-_diverting_gambling_losses_22_june.pdf

[17] Department of Internal Affairs. (2026). Explore Pokie data. Retrieved 26 August 2026 from https://www.granted.govt.nz/dashboard

[18] Cox, M., Hurren, K., & Nana, G. (2019). A proposed approach for assessing the effects of gambling on wellbeing in New Zealand

25. Figure 3 shows the strong redistributive effect of class 4 community grants where less deprived communities (decile 1-5) provide 26% of the GMP but receive 88% of the grants. Conversely, more deprived communities (decile 6-10) provide 74% of the GMP but receive only 12% of the grants.[19]

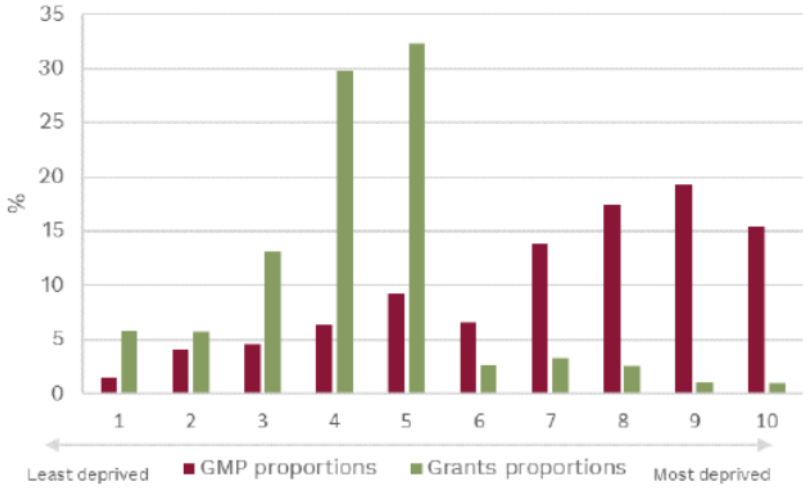


Figure 3: The origin of GMP and the destination of class 4 grants by socio-economic decile

26. While community grants can provide some benefit, the broader social and economic harms associated with gambling, including financial hardship, reduced wellbeing and increased pressure on social services, are likely to outweigh these benefits. This highlights the need to reduce reliance on gambling-derived funding and to pursue more sustainable, less harmful models of community investment. As stated in the Social Impact Assessment, the economic costs of gambling outweigh the financial benefits to Waimakariri.

27. The return of gambling revenue through grants is often used to justify the presence of gaming venues and machines. However, this view may not reflect public sentiment. The New Zealand Gambling Survey found that 46.2% of respondents felt that raising money through gambling does more harm than good.[20]

[19] Cox M, Hurren K, Nana G. Assessment of the effects of Class 4 gambling on Wellbeing in New Zealand: Final Report. Wellington: Business and Economic Research Limited; 2020.

[20] Ministry of Health. (2024). New Zealand Gambling Survey 2023/24 [Data set]. Health New Zealand – Te Whatu Ora

Specific Comments

28. NPHS Te Waipounamu commends Council for conducting a comprehensive Social Impact Assessment to understand the potential harms that Class 4 gambling causes in the district. We acknowledge Council's work engaging with a range of stakeholders to inform the Social Impact Assessment.

29. NPHS Te Waipounamu strongly recommends that Council implements a sinking lid policy. As stated in our previous feedback, we recommend that Council adopts a sinking lid policy that bans the establishment of any new Class 4 or TAB venues.

30. A sinking lid policy gradually reduces the number of gaming venues and machines overtime by restricting new licenses and replacements. A sinking lid policy is one of the most effective policy interventions available to reduce the number of pokie machines, expenditure on pokie machines and the associated gambling harm.[21] Gambling availability is a key driver of gambling participation and expenditure, therefore maintaining a sinking lid approach remains important to reduce exposure and associated harm.

31. By adopting a sinking lid policy, Waimakariri District Council would join the growing number of local authorities adopting sinking lid policies. Currently, over half (55%) of councils in Aotearoa New Zealand have adopted a sinking lid policy. Councils that implement sinking lid policies have seen reductions in the number of gaming machines, venues, and overall Class 4 gambling expenditure.[22]

32. Our primary recommendation is to adopt a sinking lid policy. If Council decides not to adopt a sinking lid, we recommend introducing an absolute cap of 163 Class 4 gaming machines. This would maintain the current number of Class 4 gaming machines in the district and prevent any growth in the Class 4 gambling ecosystem.

33. We do not support the proposal to maintain the per capita cap on gaming machines in the district. The maximum number of permitted machines has increased in the proposed policy because the Waimakariri population has grown. Currently, there are 163 machines in Waimakariri, and the proposed policy allows up to 197 machines, meaning the number of machines could grow by 34. This is almost a 20% increase in the number of gaming machines and could lead to increased gambling opportunities and therefore more gambling harm.

34. We note that the current policy allows Class 4 venues and machines to relocate. We recommend that Council either bans relocations or prohibits relocations to areas with high levels of socioeconomic deprivation (e.g. deprivation deciles 7 to 10). Allowing the relocation of Class 4 gambling can contribute to the concentration of venues and machines in deprived areas, and potentially expose new communities to Class 4 gambling.

35. NPHS Te Waipounamu wishes to be heard with respect to this technical advice.

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[21] Erwin, C., Lees, K., Pacheco, G., & others. (2020). Capping problem gambling in NZ: The effectiveness of local government policy intervention.
[22] Erwin, C., Pacheco, G., & Turcu, A. (2022). The effectiveness of sinking lid policies in reducing gambling expenditure. Journal of Gambling Studies, 38(3), 1009-1028.

Health New Zealand
Te Whatu Ora

Ngā mihi,



Vince Barry
Regional Director
National Public Health Service
Te Waipounamu Region



Dr Cheryl Brunton
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The Gaming Machine Association of New Zealand's Submission on Waimakariri District Council's Gambling Venue Policy

Introduction

1. The Gaming Machine Association of New Zealand ("the Association") represents the vast majority of the gaming machine societies that operate in New Zealand. The Association wishes to provide Waimakariri District Council with pertinent information regarding gaming machine gambling to help council to make a balanced, evidence-based decision.

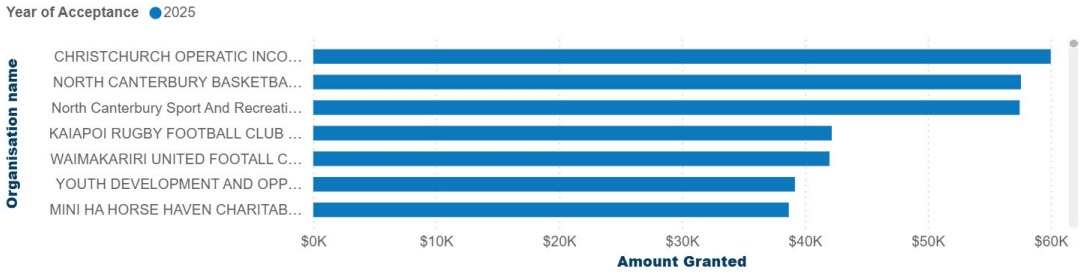
Summary

2. The Association supports option 3, the per capita cap policy.

3. It is noted that changes to the existing relocation policy fall outside the scope of this consultation. Any such changes would therefore require a separate consultation process.

Local Data and Information

4. The amount of grants made to Waimakariri District-based organisations is posted on the granted.govt.nz website. In 2025, grants totalling **$1,956,866** were made to the Waimakariri District:



5. In addition to the external grants, club venues use the proceeds from the machines to support their members and their club facilities. Three of the 11 venues that operate gaming machines in the Waimakariri District are club venues: the Kaiapoi Workingmen's Club & MSA Inc with 18 gaming machines, the Oxford Workingmen's Club & MSA Inc with 12 gaming machines, and Rangiora Returned Services Association with 18 gaming machines.

6. Local gaming venue numbers have declined. In March 2015, the Waimakariri District had 12 gaming venues. In June 2026, the District had 11 gaming venues.

7. Problem gambling presentations from persons based in the Waimakariri District are low. The Ministry of Health keeps a record of the number of people in each territorial authority who seek help via the phone, text, email or face-to-face counselling services that are

available. The Waimakariri District presentation data[1] (Table 10 – excludes brief interventions) are as follows:

2020/21	new clients 4	total clients seen 8
2021/22	new clients 3	total clients seen 7
2022/23	new clients 8	total clients seen 9

Benefits from Gaming Machines - Gambling is an Enjoyable Activity

8. Gambling is a popular form of entertainment that most New Zealanders participate in. The 2025 New Zealand Gambling Survey[2] found that 64.1% of adult New Zealanders had participated in some form of gambling in the previous 12 months (estimated to be 2,760,000 New Zealanders aged 15 and over).



9. The majority of people who gamble do so because they find it an enjoyable activity. This was observed by Suits (1979, p. 155)[3], who stated:

> Gambling is a recreational activity or a kind of participation sport from which the principal satisfaction derives from the activity itself and from the ebb and flow of wins and losses rather than from ultimate outcome - the net amount won or lost. For most gamblers, the purpose of gambling is not to get rich, but to "have fun," to experience "excitement," or to have "something to look forward to," and they

1 https://www.health.govt.nz/statistics-research/statistics-and-data-sets/problem-gambling/gambling-harm-services-data#toc-0-1

2 https://kupe.healthpromotion.govt.nz/nzgs/participation-frequency-and-expenditure/any-gambling/any-gambling-activity/

3 Suits, D. (1979). The Elasticity of Demand for Gambling. The Quarterly Journal of Economics, 93(1), 155–162.

> view payment for this recreation in the same light as others look on outlays for theatre tickets, vacation trips, or a night on the town.

10. Gambling for the non-addicted gambler may be an avenue for socialising, stress relief and a way of having fun. Contrary to how it may appear from a non-gambler's perspective, gamblers do not necessarily anticipate they will make money from gambling. Parke (2015)[4] stated:

> Players mostly realise that they are paying for a leisure experience. They are not expecting to be paid, except for a small minority, who are going to earn an income as a professional gambler.

Gaming Machines – Key Facts

11. Gaming machines have been present in New Zealand communities since the early 1980s. Initially the machines were operated without a gaming licence. The first gaming licence was issued to Pub Charity on 25 March 1988, over 38 years ago.

12. New Zealand has a very low problem gambling rate by international standards. The March 2025 New Zealand National Gambling Survey[5] found that the combined rate of moderate-risk gambling and problem gambling was 2.4% of the adult population (aged 15+). This equates to approximately 104,000 adults. A subsequent OIA request[6] revealed that this was comprised of 0.5% problem gambling and 1.9% moderate risk gambling. The problem gambling rate is for all forms of gambling, not just gaming machine gambling.

13. All gaming machine societies contribute to a problem gambling fund. This fund provides over $25 million per annum to the Ministry of Health to support and treat gambling addiction and to increase public awareness. The funding is ring-fenced and not able to be redirected to other health areas.

14. An excellent, well-funded problem gambling treatment service exists. The problem gambling helpline is available 24 hours a day, 365 days per year. Free, confidential help is available in 40 different languages. Free face-to-face counselling is also available, and specialist counselling is available for Māori, Pasifika and Asian clients. An anonymous, free text service (8006) is available. Support via email is also available (help@pgfnz.org.nz).

Existing Gaming Machine Safeguards

15. Adopting a more restrictive policy is not necessary given the significant measures that are already in place to minimise the harm from gaming machines.

16. Gamblers are now only permitted to make one cash withdrawal per day. If a second cash

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4 Parke, J. (2015). Gambling, leisure and pleasure: Exploring psychosocial need satisfaction in gambling. Presentation at the KPMG eGaming summit. https://assets.kpmg/content/dam/kpmg/pdf/2016/07/im-esummit-report-2015.pdf.

5 https://kupe.healthpromotion.govt.nz/nzgs/gambling-harm/problem-gambling-severity-index/

6 https://www.gamblinglaw.co.nz/download/OIA_Problem_Gambling_Rate_March_2025.pdf

withdrawal is made, the venue staff are required to talk to the player about their gambling and complete a two-page report about the person's gambling. That report must then be reviewed by the venue manager within seven days.

17. ATMs are excluded from all gaming rooms. ATMs at gaming venues must be in direct line of sight from the main bar area or main customer service area.

18. Gaming machines cannot be visible from outside the venue.

19. Venue staff are required to undertake three formal sweeps of the gaming room per hour and keep a detailed record of each sweep.

20. Limits exist on the type of venues that can host gaming machines. The primary activity of all gaming venues must be focused on persons over 18 years of age. For example, it is prohibited to have gaming machines in venues such as sports stadiums, internet cafes, and cinemas.

21. There is a statutory age limit that prohibits persons under 18 years of age playing a gaming machine.

22. There are very restrictive limits on the amount of money that can be staked and the amount of prize money that can be won. The maximum stake is $2.50. The maximum prize for a non-jackpot machine is $500.00. The maximum prize for a jackpot-linked machine is $1,000.00.

23. All gaming machines in New Zealand have a feature that interrupts play and displays a pop-up message. The pop-up message informs the player of the duration of the player's session, the amount spent, and the amount won or lost. A message is then displayed asking the player whether they wish to continue with their session or collect their credits.

24. Gaming machines in New Zealand do not accept banknotes above $20.00 in denomination.

25. All gaming venues have a harm minimisation policy.

26. All gaming venues have pamphlets that provide information about the characteristics of problem gambling and how to seek advice for problem gambling.

27. All gaming venues have signage that encourages players to gamble only at levels they can afford. The signage also details how to seek assistance for problem gambling.

28. All gaming venue staff are required to have undertaken comprehensive problem gambling awareness and intervention training.

29. Any person who advises that they have a problem with their gambling is required to be excluded from the venue.

30. It is not permissible for a player to play two gaming machines at once.

31. All gaming machines have a clock on the main screen. All gaming machines display the odds of winning.

32. The design of a gaming machine is highly regulated and controlled. For example, a gaming machine is not permitted to generate a result that indicates a near win (for example, if five symbols are required for a win, the machine is not permitted to intentionally generate four symbols in a row).

33. It is not permissible to use the word "jackpot" or any similar word in advertising that is visible from outside a venue.

The Current Population-Based Cap is Reasonable

34. The current cap is reasonable given the current environment of high regulation, Waimakariri's population growth, and the expansion of online gambling.

35. There is no direct correlation between gaming machine numbers and problem gambling rates. Over the last 15 years, the problem gambling rate has remained static, despite gaming machine numbers declining by over 25%.

36. The 2012 National Gambling Survey[7] concluded that the prevalence of problematic gambling reduced significantly during the 1990s and has since stayed about the same. The report stated on pages 17 and 18:

> Problem gambling and related harms probably reduced significantly during the 1990s but have since remained at about the same level despite reductions in non-casino EGM numbers and the expansion of regulatory, public health and treatment measures. Given that gambling availability expanded markedly since 1987 and official expenditure continued to increase until 2004, these findings are consistent with the adaptation hypothesis. This hypothesis proposes that while gambling problems increase when high risk forms of gambling are first introduced and made widely available, over time individual and environmental adaptations occur that lead to problem reduction.

37. The New Zealand National Gambling Study: Wave 3 (2014)[8] noted that the problem gambling rate had remained the same over the last 10-15 years despite gaming machine numbers decreasing. The report stated on page 19:

> In contrast to the 1990s, there is no evidence that problem gambling prevalence decreased with decreasing participation rates during the 2000s. When methodological differences between studies are taken into account, it appears that problem gambling prevalence has remained much the same during the past 10 to 15 years.
>
> …gambling participation has decreased substantially in New Zealand during the past 20 years, and problem gambling and related harm has probably plateaued…

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7 https://www.gamblinglaw.co.nz/download/national-gambling-study-report-2.pdf

8 https://www.gamblinglaw.co.nz/download/NZ_National_Gambling_Study_Wave4_2015.pdf

38. Professor Max Abbott is New Zealand's leading expert on problem gambling. In 2006, Professor Abbott published a paper titled *Do EGMs and Problem Gambling Go Together Like a Horse and Carriage?* The paper noted that gaming machine reductions and the introduction of caps generally appear to have little impact on problem gambling rates. Professor Abbott noted:

> EGM reductions and the introduction of caps generally appear to have little impact (page 1).
>
> Over time, years rather than decades, adaptation ('host' immunity and protective environmental changes) typically occurs and problem levels reduce, even in the face of increasing exposure (page 6).
>
> Contrary to expectation, as indicated previously, although EGM numbers and expenditure increased substantially in New Zealand from 1991 to 1999, the percentage of adults who gambled weekly dropped from 48% to 40%. This is of particular interest because it suggests that greater availability and expenditure do not necessarily increase high-risk exposure (page 14).

39. Adopting a more restrictive policy is unlikely to reduce problem gambling, but will, over time, reduce the amount of funding available to community groups based in Waimakariri District. Reducing gaming machine venues reduces casual and recreational play, and therefore reduces machine turnover and the amount of money generated for grant distribution. However, problem gamblers are people who are addicted to gambling. If a new bar is established and the policy prevents that bar from hosting gaming machines, a person who is addicted to gambling will simply travel the short distance to the next bar that has gaming machines, or worse, may move to another form of gambling such as offshore-based internet and mobile phone gambling.

<u>Unintended Consequences – Increase in Internet and Mobile Phone Gambling</u>

40. Any reduction in the local gaming machine offering may have unintended consequences, as this may simply lead to a migration of the gambling spend to offshore internet- and mobile-based offerings. While it is illegal to advertise overseas gambling in New Zealand, it is not illegal to participate in gambling on an overseas-based website or mobile phone application.

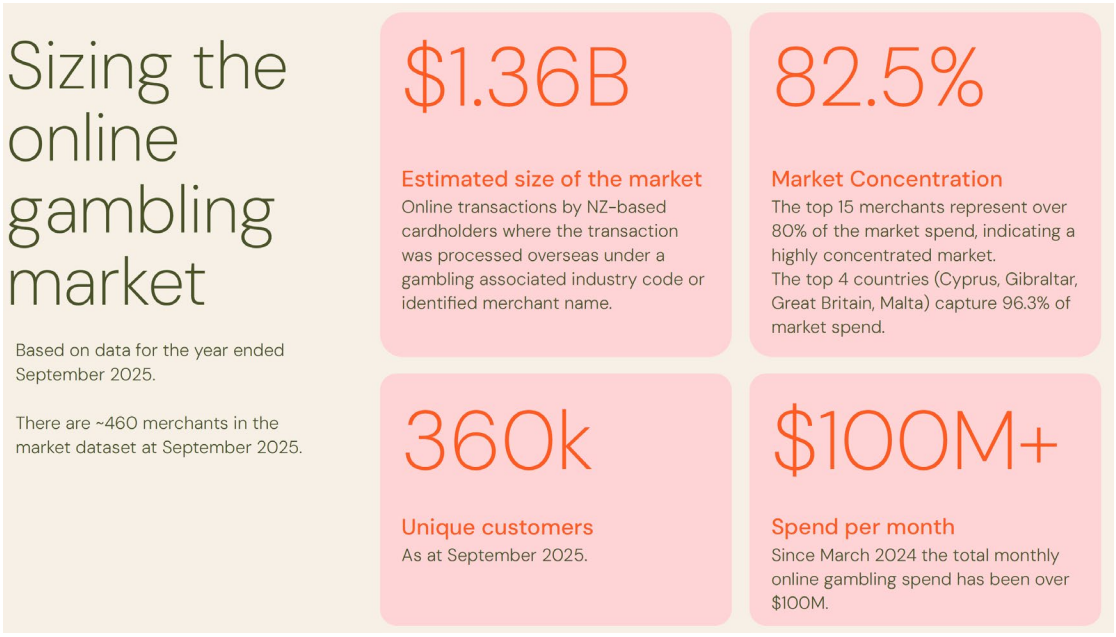


41. It now takes only a simple search and a few minutes to download to your computer, tablet, or mobile phone any type of casino game you desire, including an exact replica of the gaming machine programs currently available in New Zealand venues.

42. The 2020 Health and Lifestyle Survey found that 1 in 4 New Zealand adults participated in some form of online gambling, with 19% participating almost every week.[9]



43. The November 2025 Historical Market Report[10] estimated the New Zealand online gambling market (both sports betting and online casino gambling) to be $1.36b:



44. The November 2025 Historical Market Report[11] found that the New Zealand online gambling market is expanding both in breadth (more customers) and depth (more

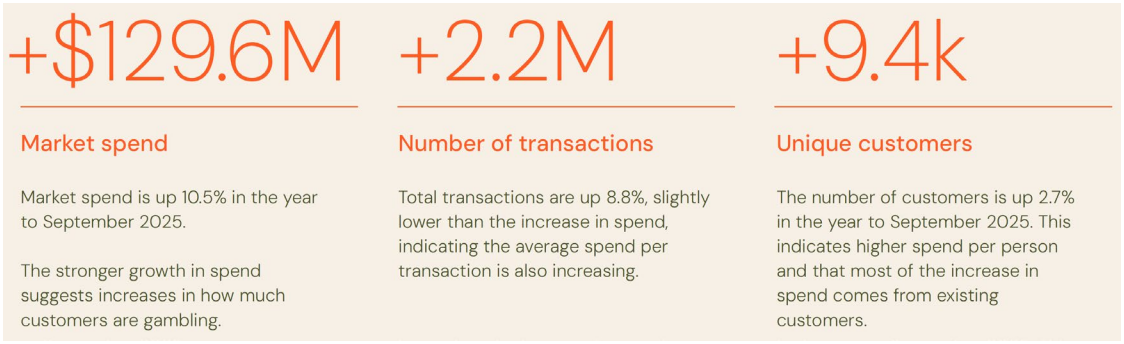
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9 https://www.gamblinglaw.co.nz/download/2020_Health_and_Lifestyles_Survey_report.pdf

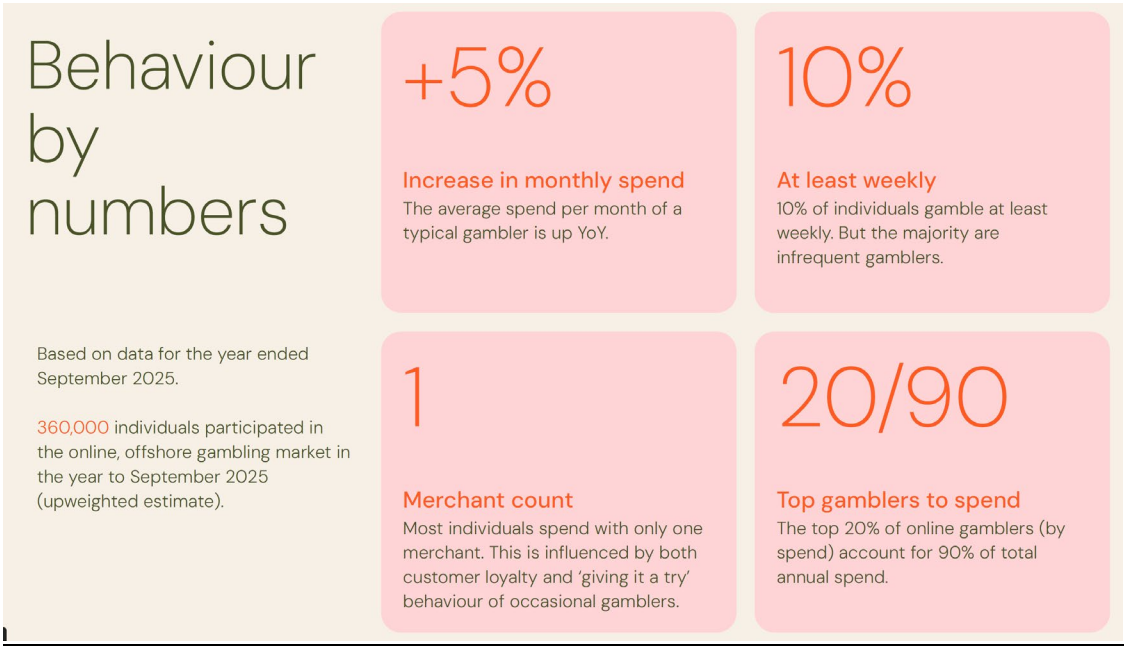
10 https://www.gamblinglaw.co.nz/download/2025-New-Zealand-Market-Insights-Report-Historical-Market-Analysis.pdf

11 https://www.gamblinglaw.co.nz/download/2025-New-Zealand-Market-Insights-Report-Historical-Market-Analysis.pdf

transactions per customer, and higher spend per transaction). Market spend was up 10.5% in the year to September 2025:



45. The November 2025 User Behaviour Report[12] found that in the year ended September 2025, 360,000 individuals participated in online, offshore gambling:



46. The migration from physical Lotto stores and SkyCity was apparent during the Covid-19 lockdowns. When the physical venues were closed, the number of online registered players, and the amount of online revenue, skyrocketed:

'MyLotto':

- 2018 748,000 registered players.
- 2020 1,230,000 registered players.

- 2018 $201m spend.
- 2020 $430m spend.

12 https://www.gamblinglaw.co.nz/download/2025-New-Zealand-Market-Insights-Report-User-Behaviour.pdf

SkyCity online casino:

- 2018 25,661 registered players.
- 2020 48,958 registered players.

- 2018 $254m spend.
- 2020 $793m spend.

47. The Australian National University 2024 study *Gambling Participation in Australia 2024, Trends Over Time, and Profiles Associated with Online Gambling*[13] confirmed the player migration from physical gambling venues to online. The study found at page 6:

> Our data also suggest that these individuals may have 'switched' their gambling activity from venue-based gambling (e.g. EGM gambling) to activities that are readily available online in Australia, such as betting on sports and racing. This may reflect [an] increase in overall online gambling participation that has been observed prior to COVID-19.

48. Offshore-based online gambling poses considerable risks because it:

- Is highly accessible, being available 24 hours a day from the comfort and privacy of your home;
- Has no restrictions on bet sizes;
- Has no capacity for venue staff to observe and assist people in trouble;
- Reaches new groups of people who may be vulnerable to the medium;
- Provides no guaranteed return to players;
- Is more easily abused by minors;
- Has reduced protections to prevent fraud, money laundering or unfair gambling practices; and
- Is currently unregulated, so on-line gamblers are often encouraged to gamble more by being offered inducements or by being offered the opportunity to gamble on credit. For example, many overseas sites offer sizable cash bonuses to a customer's account for each friend that they induce to also open an account and deposit funds.

49. The 2019 New South Wales Gambling Survey[14] found that the problem gambling rate among internet gamblers was twice as high as gamblers who gambled in physical venues.

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13 https://www.gamblinglaw.co.nz/download/Gambling_in_Australia_2024_002.pdf

14 https://www.gamblinglaw.co.nz/download/NSW-Gambling-Survey-2019.pdf

The report stated:

> Internet gamblers were more likely than non-internet gamblers to be moderate-risk and problem (18% compared with 5%). Problem gambling prevalence among internet gamblers was twice as high (4% compared with 2% of non-internet gamblers). Similarly, internet gamblers were more than three times more likely to be in the moderate-risk category (14% compared with 4% of non-internet gamblers).

50. Offshore-based online gambling currently does not generate any community funding for New Zealanders, and currently does not make any contribution to the New Zealand health and treatment services, as no contribution is made to the problem gambling levy.

51. The Government has confirmed its decision to regulate online casino gambling and begin issuing online gambling licences from 1 December 2026. The introduction of a licensing system will allow offshore-based online providers to market and advertise more freely, which is expected to drive significant growth. However, only 4% of their gross revenue will be allocated to community grants. These providers are likely to be entirely based offshore, resulting in no local employment and all profits being removed from New Zealand.

<u>Council Conflicts of Interest</u>

52. It is important that the committee of councillors that determines the gambling venue policy reflects the full views of the community. It has, however, become common for councillors who are involved in community and sporting groups to withdraw from the gambling venue policy deliberation as they consider the receipt of funding by a group that they are associated with constitutes a conflict. It has also been common for councillors with very strong, pre-determined anti-gambling views to refuse to withdraw from the policy deliberation, despite their strongly held views.

53. The Association has sought independent legal advice (copy attached) from Brookfields Lawyers regarding gambling venue policy conflicts. In summary, the key advice is:

- Being a member of a club or organisation that receives funding from a gaming grant will not usually give rise to conflict of interest when it comes to deciding or discussing Council's gambling venue policy, unless that member holds a paid role (e.g., a coach who is paid for that service); and

- Where an elected member, outside of a debate on the issue, has expressed a view on the gambling venue policy that suggests that they do not and cannot have an open mind on the matter, this could give rise to a conflict of interest on the grounds of predetermination.

Oral Hearing

54. Jarrod True, on behalf of the Gaming Machine Association of New Zealand, would like to make a presentation at the upcoming oral hearing.

25 September 2026

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15 March 2021

By Email: chair@gmanz.nz

Gaming Machine Association of New Zealand
c/o Peter Dengate-Thrush
Independent Chair

ATTENTION: Peter-Dengate Thrush

GAMBLING VENUE POLICY - CONFLICT OF INTEREST

We refer to your email instructions of 26 February 2021, seeking our advice regarding councillor conflicts of interest with respect to decision-making on Council's gambling venue policy.

YOUR QUESTIONS

1. You have asked us to advise whether:

   a. Membership of a club or organisation that receives gaming machine grant funding would constitute a conflict of interest that would require the councillor to withdraw from decision-making or discussion regarding a proposed gambling venue policy; and

   b. If Council has itself received gambling grant funding, does this impact on its ability to decide on a gambling venue policy, such that the decision should be made by an independent commissioner?

EXECUTIVE SUMMARY

1. In summary:

   a. If an elected member has a financial interest in a club or organisation that may be impacted by the gambling venue policy, the member must not participate in any discussion or decision-making on the policy. It would be rare for a financial interest to arise in this context, but examples may be where the elected member is in a paid role at a club or organisation, and the role is funded from a gaming grant. A more remote interest may arise where the quantum of membership fees paid to a club or organisation may be impacted by a gaming grant. In those circumstances,

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it may be prudent to seek a decision from the Auditor-General as to whether the potential interest is deemed too remote to influence decision-making.

b. Being a member of a club or organisation that receives funding from a gaming grant will not usually give rise to a conflict of interest when it comes to deciding or discussing Council's gambling venue policy, unless that member holds a paid role (e.g. a coach who is paid for that service).

c. Being a member or a club or organisation that operates a gaming licence will give rise to a conflict of interest, particularly where the elected member serves in an executive role at the club or organisation.

d. Where an elected member, outside of a debate on the issue, had expressed a view on the gambling venue policy that suggests that they do not and cannot have an open mind on the matter, this could give rise to a conflict of interest on the grounds of predetermination.

2. The fact that Council may have previously been the recipient of gaming grant money would not create a conflict of interest when deciding its gambling venue policy. Such democratic decision-making is fundamental to its role and is distinguishable from regulatory or quasi-judicial decision-making where appointment of an independent commissioner may be appropriate to avoid any appearance of bias. The decision-making processes in the Local Government Act 2002 (**LGA**) already impose important requirements to ensure that such decision-making involves consideration of broader community views and not just the interests of Council as an organisation. It would therefore be unnecessary and inappropriate to appoint an independent commissioner because Council initiatives may have previously benefited from gaming grants.

ANALYSIS

3. Under section 101 of the Gambling Act 2003 (**GA**), territorial authorities must, using the special consultative procedure in section 83 of the LGA, adopt a policy that specifies whether class 4 venues may be established in the district, and if so, where they may be located (**the policy**). The policy may also specify any restrictions on the maximum number of gaming machines that may be operated at a class 4 venue and may include a relocation policy.

Does membership of an organisation or club create a conflict of interest for participation in discussion or decision-making on gambling venue policies?

4. It is not uncommon for councillors to be members of organisations and clubs, some of which may receive grant funding from gaming machines. This raises the question of whether membership of such a club or organisation would constitute a conflict of interest that would prevent the councillor from participating in discussion or decision-making regarding the policy.

5. Broadly speaking, a conflict of interest occurs when an elected member is affected by some other interest that he or she has in their private life. There are different types of conflict of interest:

a. Financial conflicts of interest – where the member (or their spouse or partner) has a direct or indirect financial interest in a particular decision, they cannot discuss or vote on the matter.[1]

b. Non-financial conflicts of interest.

Financial conflicts of interest

6. The applicable legislation is the Local Authorities (Members' Interests) Act 1968 (**LAMIA**). While the LAMIA does not define what a financial interest is, section 6(2) outlines a number of examples where a member will be deemed to have a financial interest:

- The member, or his or her spouse, owns 10% or more of the issued capital of an incorporated company or any company controlling that company, that has a pecuniary interest (direct or indirect) in a matter before the local authority or committee; or
- The member, or his or her spouse, is a member of the company and either of them is the managing director or the general manager of the company; or
- The member, or his or her spouse, is a member of a company controlling the company having a pecuniary interest in the matter before the local authority or committee, and either the member, or his or her spouse, is the managing director or the general manager; or
- The member, or his or her spouse, is the managing director or general manager of the company, and either of them is a member of a company controlling that company.

7. Other than these examples, the LAMIA does not define what a "financial interest" is. However, the Auditor-General has described a "financial interest" as "a reasonable expectation of financial loss or gain from the particular decision".[2]

8. It is unlikely that membership alone of a community organisation that receives gaming grant funding would give rise to a financial interest. This is because such organisations and clubs are usually run on a not-for-profit basis. One example where a financial interest could potentially arise would be if the member were in a paid position at the club or organisation, and the funding for that position comes from gaming grants. Another example may be where there is a prospect that membership fees or subscriptions to a club could be affected by the amount of gaming grant funding. However, given that gambling venue policies are relatively high-level in nature and do not directly address matters such as the licensing of particular venues (which involve a separate decision-

[1] Section 6(1) of the Local Authorities (Members' Interests) Act 1968.
[2] Controller and Auditor-General, **Local Authorities (Members' Interests) Act 1968: A Guide for members of local authorities on managing financial conflicts of interest**, June 2020, at 4.15, referring to the definition of a financial interest in **Downward v Babington** [1975] VR 872.

making process, often by Council officers acting under delegated authority), or allocation of gaming grants (which are decided by the organisations that operate gaming licences subject to statutory requirements), any such potential impact is likely to be too speculative or remote to constitute a financial interest in the decision-making on a gambling venue policy.

9. Notwithstanding this view, where an elected member may receive a financial benefit of the kind described above from a club or organisation receiving gaming grant funding, they may as a matter of prudence wish to first obtain an exemption from the Auditor-General under section 6(3)(f) of the LAMIA (on the grounds that the financial interest is too remote or insignificant to be regarded as likely to influence him or her in voting or taking part in the discussion of the policy) before participating in discussion or decision-making on the policy. It is a relatively simple process to apply for such an exemption.

Non-financial conflicts of interest

10. A non-financial conflict of interest is any situation where a member is not affected financially by a decision but is affected in some other way that may constitute bias or the appearance of bias. Non-financial conflicts of interest are relevant to the avoidance of bias in decision-making. As opposed to financial interests, which can create personal liability for an elected member, bias is a matter of Council's accountability to the public. The avoidance of bias is part of the administrative law principles of natural justice, which require the Council to act fairly in reaching its decisions. The fairness principle has been described in these terms:[3]

> In exercising that discretion, as in exercising any other administrative function, they [members] owe a constitutional duty to perform it fairly and honestly … What is a fair procedure to be adopted at a particular enquiry will depend upon the nature of its subject matter.

11. The test for whether an interest may give rise to an apparent bias has been stated by the Court of Appeal as being where circumstances:[4]

> …might lead a fair-minded lay observer to reasonably apprehend that the judge might not bring an impartial mind to the resolution of the instant case.

12. Unlike a financial conflict of interest, a potential non-financial conflict does not automatically exclude a member from participating in a decision. It will depend on how serious the conflict is. The Auditor-General has suggested a number of factors that may be relevant to an assessment of whether a potential conflict is serious enough to exclude a member from participation in decision-making. They include:[5]

- The type or size of the person's other interest;
- The nature or significance of the particular decision or activity being carried out by the public organisation;
- The extent to which the person's other interest could specifically affect, or be affected by, the public organisation's decision or activity; and

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[3] **Bushell v Secretary of State for the Environment** [1981] AC 75, 95.
[4] **Muir v Commissioner of Inland Revenue** [2007] 3 NZLR 495.
[5] Controller and Auditor-General, **Managing conflicts of interest: A guide for the public sector**, June 2020, at 4.31.

- The nature or extent of the person's current or intended involvement in the public organisation's decision or activity.

13. In our view, in the context of decision-making on a gambling venue policy, the mere fact that an elected member is also a lay member of an organisation or club that receives gaming grant funding is unlikely to give rise to a conflict of interest. This is because of the level of remoteness from any possible benefit or loss associated with the decision-making. In most cases, the contents of a gambling venue policy will not directly impact on funding that has or may be received by a club or organisation from gaming machine grants. The purpose of the policy is to specify whether class 4 venues may be established, and if so their location. It can also specify restrictions on the number of gaming machines that may operate at a class 4 venue. Such matters do not necessarily impact directly on whether a club or organisation may receive gaming grant funding, and if so, the amount of any such grant. Funding decisions are made by the organisations who operate the gaming machines, not the Council. The fact that a member, by virtue of membership of a club or organisation that has received gaming grants, has knowledge or experience of the beneficial impacts that gaming grants can have on the community does not give rise to a conflict of interest. To the contrary, it may contribute to a fair and balanced consideration of the issues arising when making decisions on a gambling venue policy. This would be consistent with the purpose of the of the GA, which is *inter alia* to ensure that money from gambling benefits the community and to facilitate community involvement in decisions about the provision of gambling.[6]

14. It is important to distinguish between membership of a club or organisation that receives gaming grants, and membership of a club or organisation that holds a gaming licence. In our view, while the former would not give rise to a conflict of interest in decision-making on a gambling venue policy, there is a much greater likelihood that the latter could give rise to a conflict of interest. This is particularly the case if the elected member holds an executive role in the club or organisation that operates a gaming licence. This is because, while a gambling venue policy does not specify whether or not a particular club or organisation is able to obtain a gaming licence *per se*, the policy may affect the eligibility of a club or organisation to hold a licence. As such, participation in the discussion or decision-making by a member of any such club or organisation could create an appearance of bias and therefore a conflict of interest.

15. Elected members should also always be mindful of avoiding predetermination, i.e., approaching decision-making with a closed mind. Elected members are entitled (and expected) to bring their previous knowledge and experiences to decision-making, but to approach any decision with an open mind. This means that elected members should be cautious about being vocal, other than in the course of Council debates, about particular views in a manner that may suggest that they do not and cannot have an open mind on a particular matter. This is because a conflict of interest may arise as a result of possible predetermination (i.e. actual or perceived bias).

16. In summary:

[6] Section 3 of the GA.

a. If an elected member has a financial interest in a club or organisation that may be impacted by the gambling venue policy, the member must not participate in any discussion or decision-making on the policy. It would be rare for a financial interest to arise in this context, but examples may be where the elected member is in a paid role at a club or organisation, and the role is funded from a gaming grant. A more remote interest may arise where the quantum of fees paid to a club or organisation may be impacted by a gaming grant. In those circumstances, it may be prudent to seek a decision from the Auditor-General as to whether the potential interest is deemed to remote to influence decision-making.

b. Being a member of a club or organisation that receives funding from a gaming grant will not usually give rise to a conflict of interest when it comes to deciding or discussing Council's gaming venue policy.

c. Being a member or a club or organisation that operates a gaming licence will give rise to a conflict of interest, particularly where the elected member serves in an executive role at the club or organisation.

d. Where an elected member, outside of a debate on the issue, has expressed a view on the gambling venue policy that suggests that they do not and cannot have an open mind on the matter, this could give rise to a conflict of interest on the grounds of predetermination.

Would Council be conflicted in deciding a gambling venue policy because it has previously received gaming grants?

17. Council initiatives will frequently fall within the second category of the definition of an "authorised purpose" for which gaming proceeds may be used, as set out in section 4 of the GA i.e., "a non-commercial purpose that is beneficial to the whole or a section of the community". Notwithstanding the eligibility for Council initiatives to receive gaming grants, Parliament conferred territorial authorities with the responsibility of formulating a gaming venue policy for their districts. We do not consider that any conflict of interest would arise in relation to decision-making on a gambling venue policy because the Council may have previously been awarded gaming grants. This is because:

    a. While individual elected members are subject to the LAMIA which prevents them from participating in decision-making where they have a financial interest, Council as an entity is not subject to the LAMIA.

    b. Caselaw recognises the inevitability of a degree of conflict within councils when exercising certain statutory functions. It is established, for example, that a council may object to its own district plan, prosecute itself, and apply to itself for a resource consent.

    c. The standard of impartiality for a Council is that it must approach its duty of inquiring into submissions with an open mind.[7] Given the requirement to undertake a special consultative process and the diverse views of individual members, it is unlikely that the fact that certain projects

[7] **Lower Hutt City Council v Bank** [1974] 1 NZLR 545 at 550.

undertaken by Council have benefited from gaming grants would unduly influence Council decision-making on its gambling venue policy. For the same reasons outlined above in relation to individual members, the connection between gaming grant money and decision-making on gambling venues is too remote to constitute a conflict of interest. In any event, compliance with the statutory rules in the LGA regarding decision-making by local authorities[8] and the general principles relating to local authorities[9] are intended to ensure that Council decision-making is open, transparent, and has regard to the diversity of community interests, notwithstanding the many facets and activities undertaken by Council.

18. We note that Council is not undertaking a quasi-judicial role when formulating a gambling venue policy. There is greater need to avoid the appearance of bias when it comes to regulatory or quasi-judicial decision making (such as considering a resource consent application). In those circumstances, where there is an apparent conflict in Council's interests, it is common for Council to delegate its decision-making to an independent commissioner. To that end, the Resource Management Act 1991 (**RMA**) specifically allows for the appointment of independent commissioners to decide consent applications. However, while Council may delegate its decision-making on a gambling venue policy to a particular committee or sub-committee of Council, it would be unnecessary (and in our view, inappropriate) to delegate such decision-making to an independent commissioner.

Yours faithfully
BROOKFIELDS



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[8] Section 76 of the LGA.
[9] Section 14 of the LGA.



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Waimakariri District Gambling Venue Policy Review – Kiwi Gaming Foundation's Submission

Introduction

Kiwi Gaming Foundation has one venue in the Waimakariri District: Kaikanui Tavern, 67 Williams Street, Kaiapoi with 18 gaming machines.

Summary of Position

Kiwi Gaming Foundation recommends that the current population-based cap be retained (option 3).

The Foundation notes that changes to the current relocation policy fall outside the scope of this consultation.

The Current Cap is Appropriate

Kiwi Gaming Foundation receives grant requests that exceed the amount of local funding generated. Retaining a policy that allows for a small amount of additional growth will help to keep the current level of community funding sustainable and avoid an even higher level of funding unavailability.

The population-based cap is reasonable given the significant community funding that is generated from the gaming machines, the positive economic impact of the machines, and the growth of online gambling.

Community Funding

In 2025, Kiwi Gaming Foundation made grants totalling **$605,976** to Waimakariri District-based community groups.[1]

The total amount of gaming machine funding to Waimakariri District-based community groups in 2025 totalled **$1,956,868.**

Gaming societies are the only gambling operators that consistently support grassroots organisations. Other gambling providers, including Lotto NZ, TAB NZ, land-based commercial casinos, and offshore online platforms, do not provide comparable community funding.

[1] www.granted.govt.nz

There is no realistic alternative to this funding. The Council cannot replace millions of dollars in grants, and grassroots organisations cannot rely on central government or commercial sponsorship to fill the gap.

A 2022 survey by the Gaming Machine Association of New Zealand[2] found:

- Over 92% of responders felt it was either impossible or very unlikely that Class 4 funding could be replaced by Government funding (i.e., subsidies or grants).

- Over 86% of responders felt it was either impossible or very unlikely that Class 4 funding could be replaced by funding from other charitable trusts.

- Over 89% of responders felt it was either impossible or very unlikely that Class 4 funding could be replaced by funding directly from community members.

If funding were reduced:

- 74.9% said it would mean reduced programme delivery, due to less resources being available.

- 61.9% said it would mean reduced services (fewer offerings available to the community).

- 59.7% said it would mean increased costs for members (higher entry fees or subscription fees).

- 21.9% said a reduction in funding would risk the closure of their non-profit organisation.

Entertainment and Employment

Gambling is a mainstream entertainment activity. The 2025 New Zealand Gambling Survey[3] found 64.1% of adults had gambled in the past year, representing approximately 2.76 million people.

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2 https://www.gamblinglaw.co.nz/download/Grant_Recipient_Survey_2022.pdf

3 https://kupe.healthpromotion.govt.nz/nzgs/participation-frequency-and-expenditure/any-gambling/any-gambling-activity/



Only 0.5% of adults are estimated to be problem gamblers.

Gaming venues also create employment for hospitality staff, service technicians, and grant administrators. A 2009 survey[4] estimated that 515 full-time equivalents were employed directly or indirectly by gaming societies.

Wellbeing Impact

The 2021 TDB Advisory report[5] found that gambling in New Zealand delivered a net positive wellbeing impact of between $1.74 billion and $2.16 billion annually.

Machine Numbers and Harm

Reducing machine numbers has not reduced gambling harm. Over the past decade, machine numbers have dropped by 25%, yet problem gambling rates have plateaued. Restrictive policies risk reducing community funding and accelerating the migration of gambling spend to online gambling.

Online Gambling Risks

Online gambling is growing rapidly. The 2020 Health and Lifestyle Survey found that 1 in 4 adults gambled online, with 19% doing so weekly.

Online gambling is problematic because:

- No funds are currently generated for local community grants.
- Very little tax revenue is generated for the New Zealand Government.

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4 KPMG and Ministry of Health (2013): Gambling Resource for Local Government. Wellington: Ministry of Health, https://www.gamblinglaw.co.nz/download/Ministry_of_Health_-_KPMG_-_Gambling_Resource_for_Local_Government_2013.pdf

5 https://www.gamblinglaw.co.nz/download/Gambling_in_New_Zealand.pdf

- No funding is currently provided to problem gambling treatment services; i.e., no problem gambling levy is currently paid.

- No local employment is created.

- It is highly accessible (people can gamble from the privacy of their own bedroom, 24 hours a day, 365 days a year).

- It has a high speed of play.

- There are no bet size restrictions.

- There are no venue staff to provide supervision, advice, and support.

- It is easily abused by minors.

- There is no guaranteed return to players.

- Excessive gambling is encouraged by the frequent use of inducements to gamble, such as player rebates and bonuses.

Hearing

Kiwi Gaming Foundation does not wish to make an oral presentation. Please have regard to our written submission.

Sheldon Bell
Chief Executive

Kiwi Gaming Foundation

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2 October 2026

Waimakariri Class 4 Gambling Policy

Public Consultation

Thank you for giving NZCT the opportunity to be involved in the public consultation on your Class 4 Gambling Policy. Engaging with the community and key stakeholders provides for balanced and effective policy making.

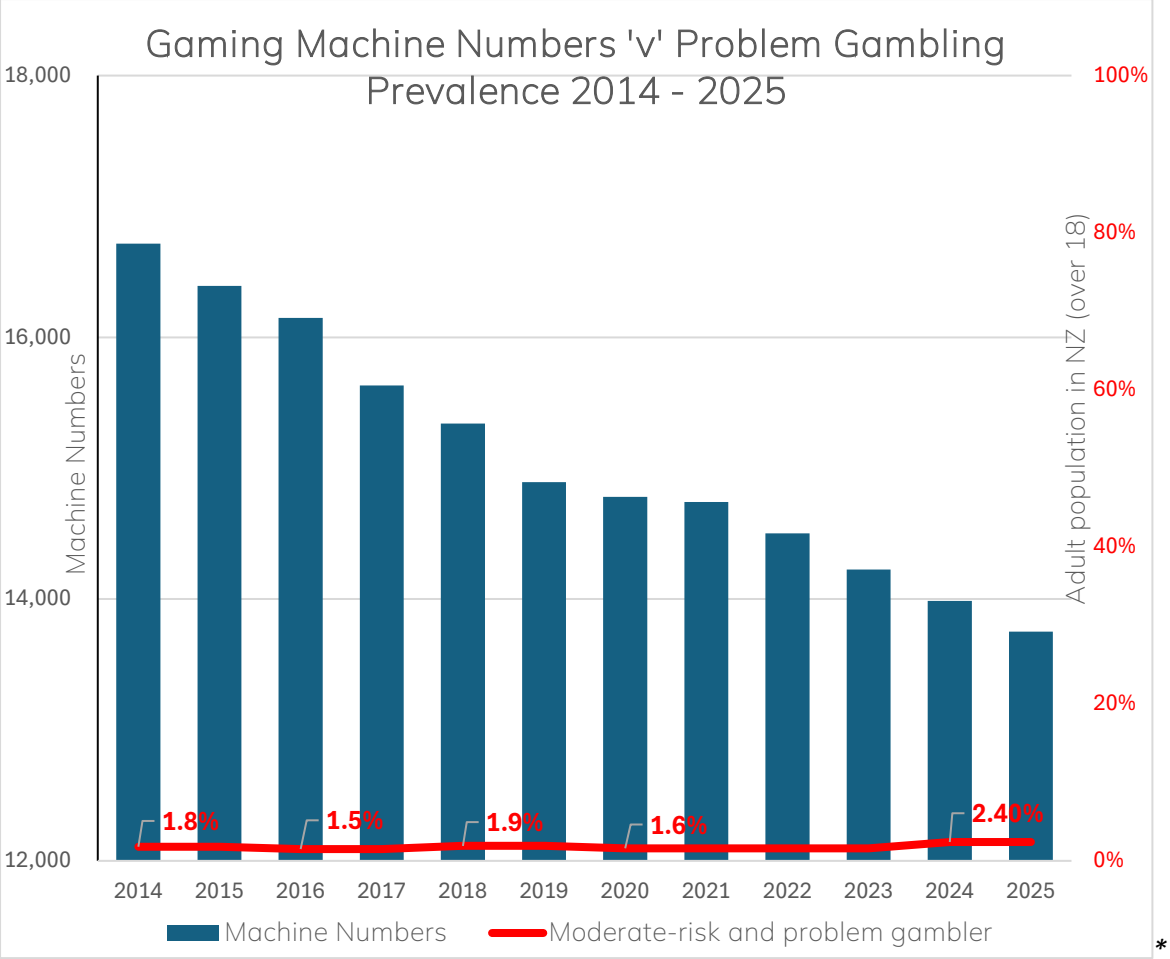
NZCT supports the current population-based cap and flexible relocation policy

NZCT supports Council's current population-based cap of 38 EGMs per 10,000 residents (aged 18 and over) as it provides your district with a popular form of entertainment that also delivers extensive community funding benefits. The status quo relocation policy is sensible and should be retained. A workable relocation provision allows venues to move to more suitable premises, protects operators from onerous lease terms, and supports re-establishment following unforeseen disruptions such as fire or natural disaster.

Sinking lids don't reduce gambling harm

Despite substantial reductions in machine numbers over time, national data does not show a corresponding reduction in problem gambling rates.

Since 2003 when the Gambling Act (2003) was promulgated, many councils have implemented sinking lid policies, leading to a reduction of 11,470 pokie machines nationwide (a 45% decrease; DIA). As the graph below illustrates, since 2014, there has been a reduction of 2,966 machines nationwide (an 18% decrease; DIA). Despite this, Health NZ reports that the rate of problem gambling and those at moderate risk of gambling harm (all gambling types) has remained stable over the same period, fluctuating only slightly between 1.8% in 2014 and 2.4% in 2024.



Note: the problem gambling rate measures ALL forms of gambling – pokies make up approximately half of the 2.4% of moderate-risk and problem gamblers shown above.[1]

NZ has a low problem gambling rate

In response to an OIA request, the Ministry of Health explains that the 2024 percentage split for moderate-risk gamblers and high-risk (problem) gamblers is as per the table below. [2]

	Total
Problem Gambling Severity Index (PGSI)	**% (95CI)**
High-risk (problem) gambler	0.5*(0.2-0.8)
Moderate-risk gambler	1.9 (1.5-2.5)

**Health NZ states that the result should be viewed as unreliable, and caution should be used when interpreting the result, as Relative Standard Error is between 0.25 and 0.5.*

[1] Gambling harm intervention services data | Ministry of Health NZ

[2] **Ministry of Health Response to NZCT OIA request 16th April 2025 (attached as appendix)*

It is important to note that moderate-risk gamblers and problem gamblers are by definition distinctly different.

The Canadian Problem Gambling Index (CPGI) which the Ministry of Health uses as the template for its Problem Gambling Severity Index (PGSI), characterises 'problem gamblers' as people who experience harm[3] and goes on to explain that 'Moderate risk' gamblers are defined as people who '*may or may not have experienced adverse consequences from gambling."*

For clarity, this is stating that moderate risk gamblers are at moderate risk (or in other words have a moderate chance) of experiencing harm at some level from their gambling. This is different to the incorrect interpretation you may see in submissions which describe the category as people who uniformly suffer moderate levels of harm.

Some submissions may also explain that 'low risk' gamblers also experience harm at low levels. But again, the PGSI states that *"…[t]his group likely will not have experienced any adverse consequences from gambling."*… at all.

Problem gambling in context

New Zealand's rate of problem gambling (not inclusive of moderate risk) is low by international standards as the following table and study shows.[4]

Comparing National Problem Gambling Prevalence Rates

Jurisdiction	Year	Problem Gambling Rate
USA	2015	4.60%
South Africa	2013	3.20%
Macau	2005	2.50%
Czech Republic	2014	2.30%
Cyprus	2012	2.20%
Northern Ireland	2010	2.20%
Canada	2005	2.00%
Hong Kong	2012	1.90%
Hungary	2012	1.90%
Germany	2015	1.70%
Brazil	2010	1.30%
Italy	2010	1.27%
Denmark	2012	0.90%
Iceland	2015	0.80%
Great Britain	2012	0.70%
Finland	2014	0.60%
South Korea	2013	0.50%
Singapore	2015	0.50%
France	2015	0.50%
Australia	2016	0.40%

[3] Canadian Problem Gambling Index: Final Report Feb 19, 2001

[4] Calado F, Griffiths MD. Problem gambling worldwide: An update and systematic review of empirical research (2000-2015). Journal of Behavioural Addictions 2016; 5(4): 592-613. Doi:10.1556/2006.5.2016.073

Norway	2009	0.40%
Sweden	2014	0.30%
New Zealand	2015	0.20%

Relatively few New Zealanders are classified as problem gamblers under PGSI measures. The majority of gambling participation falls outside categories associated with measurable harm.

For comparison, whilst problem gambling in New Zealand occurs at a rate of 0.5% - with pokies making up approximately half (0.25%) of that figure [5] - the rate of hazardous drinking (have drunk hazardously in a way that can harm themselves or others[6]) is 16.6% of adults, which is equivalent to about 720,000 people[7].

Despite the rate of hazardous alcohol consumption being sixty-six (66) times greater than problem Class 4 gambling, policy responses generally do not seek to eliminate alcohol availability, recognising that most adults can enjoy it responsibly. Alcohol is regulated through licensing, trading hours and host responsibility, not by seeking to reduce the number of bars.

The comparison illustrates the importance of proportional and evidence-based policy responses.

A sinking lid Council gaming policy would ultimately eliminate the availability of a legal and popular form of gambling entertainment for the 99.5% of adult New Zealanders who are not problem gamblers.

Historical and international policy experience suggests that prohibition approaches can result in unintended consequences and is not an effective tool for minimising harm. Eliminating gaming rooms over time does not address the root causes of problem gambling, especially since individuals can now easily shift to online gambling, which is available 24/7, has fewer controls as physical in-venue Class 4 gaming environments, and currently provides no return to the community in the form of grants.

Whilst co-morbidity can occur between problem gambling and other negative behaviours, The New Zealand Gambling Study Wave 4 (2015) states that there is no evidence for causative effects from problem gambling to those other negative experiences. It states that although problem gambling is "*highly co-morbid with substance use disorders and other behavioural addictions, as well as with mood, anxiety and personality disorders…*" [8] the "*…relationships between gambling and other mental health disorders are complex, prospective studies have found that substance use, substance use disorders and behavioural addictions are robust predictors of problem gambling onset…*"[9] and not the reverse.

[5] Gambling harm intervention services data | Ministry of Health NZ
[6] Alcohol Resources — Key facts about drinking in New Zealand
[7] https://www.health.govt.nz/publications/annual-update-of-key-results-202324-new-zealand-health-survey
[8] Pg 26 - https://www.health.govt.nz/system/files/2018-08/national-gambling-study-report-6-aug18.pdf
[9] Pg 26 - https://www.health.govt.nz/system/files/2018-08/national-gambling-study-report-6-aug18.pdf

The Class 4 sector is heavily regulated

Despite the number of problem gamblers being very small, the Class 4 sector works hard to minimise harmful behaviours. The Class 4 sector contributes over half of the annual $20 million problem gambling levy that funds a nationwide network of problem gambling services. Additionally, NZCT alone invests $650,000 annually in harm minimisation initiatives, including staff training, resources, and technology.

Gaming rooms operate within strict harm minimisation regulations, with staff trained to identify and intervene when they observe signs of harm. For example, venue staff must undertake record-keeping sweeps of gaming rooms three times an hour to monitor for, and act on, signs of harm. Furthermore, venue staff must discuss with a customer their gambling activity should a customer attempt to make a second withdrawal of money in a day from an in-venue ATM for the purposes of additional in-venue Class 4 gambling.

Responsible management and enhanced Harm Minimisation Regulations

The regulatory framework for Class 4 gambling ensures gaming lounge activities are managed with transparency and accountability.

In 2023 there were updates to these regulations that have strengthened oversight, further promoting responsible gambling practices and enhancing community trust.

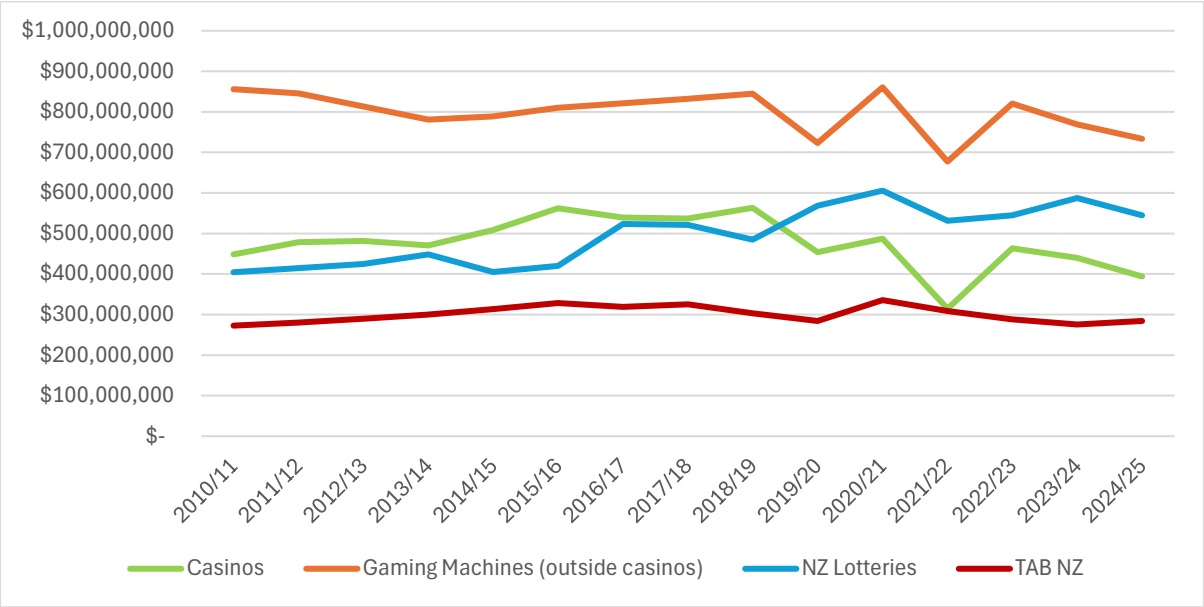
The decline of Class 4 and rise of online gambling

Class 4 no longer accounts for the largest share of annual gambling expenditure in New Zealand. Inflation adjusted Class 4 spending since 2010/11 has dropped 14% to $1.02 billion in the year to September 2025[10], and is down 0.8% (-$8.6 million) year on year. Meanwhile, online casino gambling expenditure has grown from nearly zero in 2010/11 to $1.36 billion in the year ending September 2025[11] and is up 10.5% (+$129.6 million) year on year. Lotto is also enjoying strong growth experiencing a 31% increase over the same period.

[10] https://www.dia.govt.nz/gambling-statistics-expenditure

[11] DIA x Dot Historical Market Analysis pages 9 and 10

Inflation Adjusted Gambling Expenditure[12]



NB: Online casino gambling data is missing from this graph as the DIA are not currently aggregating this with other gambling sector data.

Reducing Class 4 expenditure does not reduce harm

Claims that sinking lid policies have led to a 13% reduction in harm misinterprets research that indicated sinking lids decreased expenditure (not harm) by 13%. There is no evidence that indicates that there is a 1:1 correlation between expenditure and harm. Interestingly, the same research also found that per capita caps had the same effect on expenditure[13].

Sinking lid policies do however pose a significant risk to the sustainability of pokie grants. Pokie grants are essential for supporting non-profit organisations to foster happier, healthier, and more connected communities. In 2025, Class 4 societies awarded $1,956,866 [14][15]in grants within Waimakariri.

[12] *DIA Gambling Expenditure Statistics Report*
[13] https://www.health.govt.nz/publications/capping-gambling-in-nz-the-effectiveness-of-local-government-policy-interventions
[14] Granted.govt.nz
[15] See Appendix 2 - for possible reasons why the amount distributed by Class 4 societies in Waimakiri does not match 40% of the gaming machine proceeds (GMP) generated in Waimakiri.

Entertainment value

Class 4 gambling rooms offer recreational and social opportunities for residents. These hospitality establishments provide entertainment options and foster social connectivity in a way that online gambling does not, all whilst generating vital community funding.

Gambling has a net positive wellbeing benefit

In New Zealand, gambling in all its forms contributes net positive well-being benefits of approximately $2 billion annually[16]. This value is the sum of its entertainment value, the resulting government revenue, the problem gambling levy, and the globally unique provision of community grants that inject money into a community's not-for-profit sector and the local retail and service industries that support it.

Sustainable class 4 policy

Retaining the current policy allows for growth, and a flexible relocation policy helps ensure that gaming remains a safe, responsible, and enjoyable form of entertainment for residents, that currently contributes an annual benefit of $1,956,866 to the Waimakariri community.

By balancing growth with responsible oversight, the policy can continue to foster entertainment opportunities and social connection for Waimakariri residents, while sustaining vital funding for local initiatives.

[16] TDB Advisory Report 2021 Page 87

Appendix 1

Ministry of Health OIA request – Split of problem gamblers to moderate risk gamblers

MINISTRY OF HEALTH
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16 April 2025

Jo Salisbury

By email: jo.salisbury@nzct.org.nz
Ref: H2025063518

Tēnā koe Jo

Response to your request for official information

Thank you for your request under the Official Information Act 1982 (the Act) to the Ministry of Health – Manatū Hauora (the Ministry) on 19 March 2025 for information regarding the latest New Zealand Gambling Survey. Please find a response to each part of your request below:

> *Looking for some clarification please following the latest gambling survey release by Health NZ - Kupe - Data Explorer. Please can we have the split of problem gamblers to moderate risk gamblers as they have been combined in the same category.*
> *We've noticed that the survey has combined moderate risk gamblers and problem gamblers to get a total of 2.4% or 104,000 people. Can you please provide the split here as per previous reports?*

The percentage splits for moderate-risk gamblers and high-risk (problem) gamblers are provided in the table below.

	Total	**Male**	**Female**
Problem Gambling Severity Index (PGSI)	**% (95CI)**	**% (95CI)**	**% (95CI)**
High-risk (problem) gambler	0.5 ^ (0.2-0.8)	0.7 ^ (0.2-1.4)	0.3 ^ (0.1-0.6)
Moderate-risk gambler	1.9 (1.5-2.5)	2.2 (1.5-3.1)	1.7 (1.1-2.6)

^Indicates result should be viewed as unreliable, and caution should be used when interpreting the result, as Relative Standard Error is between 0.25 and 0.5.

Appendix 2

Possible reasons why the amount distributed by Class 4 societies in Waimakariri does not match 40% of the gaming machine proceeds (GMP) generated in Waimakariri.

1. **GST.** The 40% minimum is worked out on gross proceeds excluding GST. Published GMP figures include GST. Note that other taxes and levies, such as gaming machine duty and the problem gambling levy, along with all operating costs come out of the remaining 60%.
2. **Granted.org coding.** Granted.org doesn't always show the full funding picture. Due to limitations in how the DIA aggregates Class 4 grants data, grants awarded to more than one region e.g. Waimakariri and neighbouring TLAs are only coded to a single TLA, so grants drawing funds from and benefiting Waimakariri may not always appear in your district's grants list.
3. **Clubs.** Clubs who operate Class 4 gaming machines have their GMP captured in the DIA's GMP data for each TLA, but the funds such clubs apply to their own purposes do not appear in Granted.org. which effect the 40% calculations.
4. **Not enough applications.** Occasionally there are simply not enough quality applications to award funds to in a given TLA. If this occurs, NZCT's policy is to roll over residual funds at financial year end into the next financial year. Funds raised in Waimakariri remain ringfenced for allocation in Waimakariri until spent.
5. **Not enough funds generated.** The 40% requirement is applied to societies on a national scale and does not always scale down to a given TLA. In some TLAs, venues may not generate a gross profit of 40% which makes returning 40% of profit impossible. In such circumstances, the only way to achieve a 40% return would be to increase Class 4 gambling expenditure in the TLA.

   Although a community return of 40% of gross profit may not be achievable, NZCT returns **100% of net profit** back into the region that it is generated in (apart from a small amount allocated to causes of nationwide significance).

Summary check: if the amount distributed doesn't match 40% of GMP

Have you…	What to check	✓
Taken GST out of the GMP figure? (point 1)	Published GMP includes GST. Divide it by 1.15 before working out 40%.	☐
Looked for grants coded to another TLA? (point 2)	Grants covering more than one region are coded to a single TLA in Granted.org. Check neighbouring TLAs, e.g. [insert neighbouring TLA], for grants that also benefit Waimakariri.	☐
Allowed for club GMP? (point 3)	Club proceeds are in the DIA's GMP figure, but what clubs spend on their own purposes isn't in Granted.org.	☐
Checked for funds being rolled over? (point 4)	Unspent funds stay ringfenced for Waimakariri and carry into the next financial year.	☐
Considered whether venues generate enough profit? (point 5)	The 40% rule applies nationally. In some TLAs, venues don't generate enough profit to make a 40% local return possible.	☐

WHITIORA

TO: **WAIMAKARIRI DISTRICT COUNCIL**

RE: **CLASS 4 GAMBLING AND TAB VENUES DRAFT POLICIES**
FEEDBACK FROM WHITIORA

DATE: **SEPTEMBER 2026**

INTRODUCTION

Waimakariri District Council (WDC) has sought feedback on its statutory review of gambling policies. Whitiora provides strategic policy advice on behalf of rūnanga interests. We have completed our review of the draft policies and considered the accompanying Social Impact Assessment provided by WDC.

PURPOSE OF THE STRATEGY

The stated purpose is to manage venue availability and minimise gambling harm. We have weighed up the recommendation of maintaining the status quo policy as a 'balanced' approach noting that it permits a net increase of thirty-four additional electronic gaming machines (EGMs) in our communities. We have considered the evidence and potential implications of the options presented and for this review have made comment around three areas we consider relevant.

WHITIORA AND EXPECTATIONS

- **Harm Minimisation:** Support for additional protections to be included in considering new applications, relocations, or club mergers.
- **Equity:** Active, ongoing, and extended policy protection across communities at higher risk of harm.
- **Evidence-Based Policy:** Proactive elimination of data blind spots.

GENERAL COMMENTS

Tēnā koutou,

Thank you for the opportunity to provide feedback on the statutory Class 4 Gambling and Totalisator Agency Board (TAB) venues draft policies with respect to the takiwā of Te Ngāi Tūāhuriri.

Alignment with Other Policies and Rūnanga priorities

We want to acknowledge the significant effort that has gone into shaping this draft. We commend the Social Impact Report, which we consider to be thorough, rigorous, and logically sound.

Section 5.3 & 5.5: Venue Density and Socio-Economic Deprivation

The data reveals that 63.6% of active venues are clustered in socio-economic deprivation deciles 7–10. These machines extracted $10.3 million in nominal player losses in 2024 alone with only 16% of that wealth returned to the district via community grants. We do not consider this a balanced economic return relative to the harm caused.

Therefore, we support the:

- inclusion of an additional criterion restricting the relocation of venues and EGMs within areas of high socio-economic deprivation *at a minimum*,
- reinforcement of strict exclusion zones around high-deprivation areas, schools, churches, social service providers (including violence prevention and mental health and addiction support services),
- use of harm mapping and socio-economic data to guide location decisions and prevent new venues from being established in areas already at higher risk of experiencing gambling harm,
- prohibition of venue clustering within a specified radius (e.g., 1–2 km) to avoid the oversaturation of gambling venues in any one community.

Section 5.3.2: Māori Impact & Cultural Proximity

Māori shoulder 31.5% of national problem gambling costs despite making up only 15% of the population. Furthermore, māori experience a 2.0% problem gambling prevalence rate - the highest of any demographic. We consider that this is an under-representation of the full cost of problem gambling both at a National and District level. We therefore strongly support the continued exclusion of gambling facilities within special zones such as nohoanga and Pegasus.

Social Impact Report: Localised Evidence & Data gaps

We hold significant concerns over the heavy reliance on national statistics due to a lack of local-level data regarding gambling harm in the district. We appreciate that the policy analyst has garnered as much reliable evidence as available. However, we consider that proceeding to the next renewal period under a total data blind spot as a misstep for WDC.

The consistent increase in gambling profit generated from the district, coupled with a corresponding drop-off in residents accessing gambling harm treatment since 2014, requires special comment.

We consider it *vital that Council undertake targeted work to assess*:

- the specific extent of gambling harm within the district,
- insights into the drop off in harm reduction access and attendance,
- any other metrics pertinent to the Councils' decision-making process.

TAB Venue Policy

Section 5.2

We consider that WDC should include the same protections offered for the Class 4 Venue Policy to this policy.

- Venue Density and Socio-Economic Deprivation advice,
- Māori Impact & Cultural Proximity advice, and
- Localised Evidence & Data gaps (should an application be consented).

CONCLUSION

In conclusion, Whitiora would be happy to discuss any of the above matters further.

As currently drafted, Whitiora continues to have concerns in relation to the purpose and implementation of the policy but has erred in favour of the status quo with strong recommendations around exclusionary zones, harm minimisation and specific, localised evidence gathering related to gambling harm and the potential of unmet need.

Nāku noa, nā,

Amber Clarke (nee Pūrutī)

Pouherenga Tangata. Whitiora Centre Limited

Waimakariri District Council Gambling Venues Policy Review 2026

Community Clubs, Venue Policy Settings and Community Outcomes

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1. INTRODUCTION

Clubs New Zealand appreciates the opportunity to submit on the Waimakariri District Council Draft Class 4 Gambling Venue Policy.

Clubs New Zealand represents more than 300 clubs throughout New Zealand, including three clubs within the Waimakariri District that operate Class 4 gaming machines:

- Rangiora RSA Club
- Kaiapoi Working Men's Club & MSA
- Oxford Workingmen's Club & MSA

The three Clubs New Zealand member clubs that operate Class 4 gaming in the district collectively serve more than 9,400 members through Rangiora RSA and Kaiapoi Working Men's Club alone, while also providing facilities, services and support to countless community organisations, sporting groups, service organisations and local residents. These clubs are important community hubs that contribute significantly to the social fabric of the Waimakariri District.

Collectively these clubs provide important social, recreational and community facilities for thousands of local residents and contribute significantly to community wellbeing through volunteerism, affordable hospitality, sporting participation, veteran support, community meeting spaces and local events.

2. OVERALL POSITION

Clubs New Zealand supports the Council's proposal to retain the current Class 4 Gambling Venue Policy with only minor administrative amendments.

We acknowledge the Council's responsibility under the Gambling Act 2003 to consider both the benefits and harms associated with gambling and support a balanced approach that recognises harm minimisation while also recognising the important community benefits generated through Class 4 gaming activities.

3. THE ROLE OF CLUBS IN WAIMAKARIRI

While Class 4 gaming is often discussed solely in terms of gambling activity, it is important to recognise that club-based gaming operates within not-for-profit associations whose primary purpose is community connection.

The three Clubs New Zealand member clubs operating gaming machines within the district provide a wide range of community benefits extending well beyond gaming activity itself.

Rangiora RSA alone has a membership of more than 5,300 people and provides meeting and event space for approximately 30 community organisations every month at no or reduced cost. It also provides welfare support to veterans and assists a wide range of sporting and cultural club sections.

Kaiapoi Working Men's Club has over 4,000 members and hosts or supports a diverse range of community activities, including volunteer fire brigade groups, community organisations, sporting clubs, cultural groups and charitable events.

Oxford Workingmen's Club applies gaming proceeds directly to community-focused purposes including support for local sporting organisations, community activities, training, entertainment and maintaining facilities that serve the wider Oxford community.

These clubs are not commercial gambling operators. They are community institutions that reinvest earnings back into their members and their communities.

4. LOCAL IMPACT IN WAIMAKARIRI

The contribution made by just three Clubs New Zealand member clubs within the Waimakariri District demonstrates the significant role that club-based gaming plays in supporting local communities.

During their most recent financial years:

- Rangiora RSA generated gaming income of $988,480, resulting in net gaming proceeds of $609,734 and authorised purposes expenditure of $590,912.
- Kaiapoi Working Men's Club generated gaming income of $1,076,947, resulting in net gaming proceeds of $599,931 and authorised purposes expenditure of $605,971.
- Oxford Workingmen's Club generated gaming income of $378,974.98, resulting in net gaming proceeds of $185,009.30, all of which was applied to authorised purposes.

Together, these three clubs generated almost $2.45 million in gaming income and more than $1.39 million in net gaming proceeds. Importantly, nearly $1.38 million was returned to authorised community purposes and club activities that directly benefit local people and organisations.

These clubs returned approximately fifty six percent (56%) to authorised purposes. Those funds remain within the local community, supporting community facilities, sporting organisations, veteran welfare, events and recreational opportunities across the Waimakariri District rather than being distributed outside the region.

These figures illustrate that gaming revenue is not simply supporting the operation of clubs. It is helping to sustain facilities, services, programmes, welfare activities, sporting organisations, community events and social opportunities that would otherwise be difficult to fund.

5. WHY CLUBS ARE DIFFERENT

Clubs New Zealand encourages Council to recognise the distinction between not-for-profit clubs and purely commercial hospitality venues.

Clubs operate under a unique model. They are governed by elected committees, supported by volunteers, accountable to their members and exist primarily to serve their communities.

Unlike commercial operators, any surplus generated by clubs is reinvested back into facilities, programmes and services that benefit members and the wider community. Gaming revenue is therefore part of a broader community ecosystem where proceeds support local activities, facilities and services rather than private profit.

This distinction is particularly important when considering the social contribution made by clubs as gathering places, meeting venues, providers of affordable recreation, supporters of local sport and, in the case of RSAs, providers of welfare and support services for veterans and their families.

6. CLUB MERGERS

While Clubs New Zealand supports the proposed policy, we encourage Council to recognise that not all Class 4 venues operate under the same ownership and governance model.

Member-based clubs operate on a fundamentally different basis to commercial hospitality venues. Clubs are governed by elected committees, exist for community benefit, and reinvest surpluses into facilities, services and activities that support their members and the wider community.

For this reason, Clubs New Zealand encourages Council, to consider including definitions or explanatory provisions that recognise the unique nature of club-licensed premises. This would provide greater clarity should matters such as venue relocations, amalgamations or club mergers arise in the future.

Under the Gambling Act, club mergers are a specific mechanism designed to support the long-term sustainability of community clubs. Unlike commercial transfers, club mergers can reduce duplication, strengthen community facilities, improve financial sustainability and ensure community assets remain available for future generations.

Recognising the distinction between commercial gambling venues and clubs would provide greater certainty for both Council and community organisations while acknowledging the unique contribution clubs make to the social infrastructure of the district.

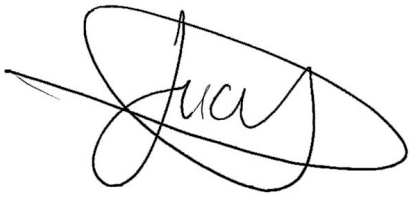
7. CONCLUSION

Clubs New Zealand supports the Council's proposal to retain the existing Class 4 Gambling Venue Policy with only minor administrative amendments. We believe the draft policy appropriately balances the need to minimise gambling-related harm while recognising the legitimate role that Class 4 gaming plays in supporting valuable community outcomes.

We encourage Council, as part of its final deliberations, to continue recognising the significant contribution that club-based gaming makes to the social fabric of the Waimakariri District and the important role that clubs play as community hubs, meeting places and providers of recreational, sporting and social opportunities for local residents.

The experience of Rangiora RSA, Kaiapoi Working Men's Club and Oxford Workingmen's Club demonstrates that community clubs are fundamentally different from commercial gambling venues. They are not-for-profit associations that exist to strengthen their communities, and gaming proceeds remain an important tool that helps them continue delivering those benefits.

Thank you for the opportunity to submit on the Draft Class 4 Gambling Venue Policy.



Lucy Waterreus
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Formal Public Consultation on the Draft Class 4 Gambling Venue Policy and Totalisator Agency Board Venue Policy - Officer Analysis and Recommendations

1. Consultation Methodology

Public consultation on the draft Class 4 Gambling Venue Policy 2026 and draft Totalisator Agency Board (TAB) Venue Policy 2026 was undertaken from 8 September to 9 October 2026. Feedback was sought through direct emails to key stakeholders who provided feedback during the review process, including problem gambling service providers, corporate societies, and grant recipients, as well as through email distributions to Let's Talk Waimakariri subscribers.

Public feedback was sought on the following policy matters:

Draft Class 4 Gambling Venue Policy 2026

- Whether new Class 4 gambling venues should continue to be permitted within the district.
- Retention of the current per capita cap of one electronic gaming machine (EGM) per 260 residents aged 18 years and over (38 EGMs per 10,000 residents aged 18 years and over).
- Retention of the current venue relocation policy.
- Any other matters Council should consider when making its final decision on the draft policy.

Draft TAB Venue Policy 2026

- Whether new standalone TAB venues should continue to be permitted within the district.
- Any other matters Council should consider when making its final decision on the draft policy.

2. Overview of Submissions

- A total of 70 submissions were received, comprising 63 submissions through the Engagement HQ platform and 7 submissions received by email.
- Most submissions were received from individual residents (58 submissions, 83%), while 12 submissions (17%) were received from organisations.
- Of the 12 organisational submissions, one was a joint submission from the Problem Gambling Harm Territorial Local Authority Policy Working Group and Social Services Waimakariri. While counted as a single submission, it represented the views of a number of organisations including the Problem Gambling Foundation, Purapura Whetū Trust, Asian Family Services, Te Kāika (Ōtākou Health Limited), Te Piki Oranga, and Mapu Maia.
- A full list of organisations that made submissions is provided in Appendix 1.

3. Framework for Assessing Submissions

In assessing submissions, officers considered the following aspects:

- **whether the matters raised supported the Council's preferred options:** the submission supported the proposed policy approach and provided reasons for retaining it.
- **whether the matters raised warranted amendment to the Draft Policies:** the submission identified a matter that officers considered justified a change to the Draft Policies.
- **whether the issues could be more appropriately addressed through explanatory material, guidance, or implementation practices:** the matter raised was valid but did not require a policy change and could be addressed through additional information, guidance, or implementation measures.
- **whether the matters raised were already addressed through national legislation or regulatory requirements:** the matter raised was important but fell within the scope of national legislation, regulations, or regulatory agencies rather than Council's gambling policies.
- **whether the issues related to operational or enforcement matters outside the scope of the Policies:** the matter raised related to day-to-day management, compliance, monitoring, or enforcement rather than policy settings.
- **whether the matters raised fell outside the scope of the review:** the submission raised issues that were unrelated to the policies under review.
- **whether there was sufficient evidence to support a policy change:** the matter raised was acknowledged, but officers considered there was insufficient evidence or justification to support an amendment to the Draft Policies.

4. Summary of analysis and officer recommendations

Policy Section/Clause	Results of analysis	Recommendations	Additional notes
New Class 4 Venue Establishment Provisions	• Of the 70 submitters, 44 (63%) opposed and 24 (34%) supported the proposal. Key reasons for opposition included: • concerns about gambling-related harm; • the disproportionate impacts of gambling on vulnerable communities; and • views that existing gambling opportunities in the district are sufficient.	• Available evidence indicates that indicators of problem gambling in the district remain low. • There has been no significant growth in Class 4 gambling availability in the district over the last three years. ***No amendment to the draft Policy is recommended.***	Changing the draft policy to prohibit the establishment of new Class 4 venues would effectively require Council to move from the proposed per-capita cap approach to a sinking lid policy. A sinking lid policy generally does not permit the establishment of new Class 4 venues and would represent a significant departure from the notified draft policy. Such a change would likely require further consultation. An alternative approach is an absolute cap policy, which sets a fixed maximum number of Class 4 venues or gaming machines. Under an absolute cap, new venues may be established while the cap has not been reached. Once the cap is reached, any further venue establishment would generally only be possible if capacity becomes available, for example through the closure of an existing venue, and subject to the specific provisions of the policy and the requirements of the Gambling Act 2003.
Current Per Capita Cap	• Of the 70 submitters, 41 (59%) opposed retaining the	Indicators of problem gambling within the district remain comparatively low.	These figures are based on census population counts rather than annual resident adult population estimates,

(1 EGM per 260 adults, equivalent to a cap of approximately 38 EGMs per 10,000 adults)	current per-capita cap of 1 EGM per 260 adults, while 27 (39%) supported its continuation. The main reasons for opposition were: • a preference for a sinking lid policy and the view that the current cap is too high; • concerns regarding gambling harm and addiction; and • a preference for prohibiting EGMs entirely.	There has been no significant growth in Class 4 gambling availability in the district over the last three years. The current per-capita cap was adopted in 2022. The continuation of this cap, together with population growth and a slight decline in the actual number of EGMs in the district, has reduced actual EGM availability from approximately 36 EGMs per 10,000 adults in 2022 to 31 EGMs per 10,000 adults in 2026. ***No amendment to the draft Policy is recommended.***	with 2018 Census data used for 2022 and 2023 Census data used for 2026. Using annual resident adult population estimates for the relevant years would likely result in a lower EGM availability rate per 10,000 adults, as they would better reflect population growth occurring between census periods.
Relocation Policy	• Of the 70 submitters, 28 (40%) supported retaining the current relocation rules for Class 4 gambling venues, while the remaining submitters were evenly split between opposing the rules and being unsure (21 submitters, 30% each). The main reason for opposition was concern about gambling harm and a preference for reducing or eliminating gambling opportunities.	There is no clear evidence that the current relocation settings are undermining the policy objectives in Waimakariri. Relocation does not increase the number of venues or EGMs and may help reduce the concentration of venues in some areas. ***No amendment to the draft Policy is recommended.***	-

5. Analysis of Responses on the Establishment of New Class 4 Gambling Venues

Question 1. Do you think the Council should continue to allow new Class 4 gambling venues within the district, subject to the location restrictions specified in the draft policy?

Question 2. Please tell us the reason for you answer above

Relevant Policy Section: 5.5 New Class 4 Venue Establishment Provisions

Officer Analysis and recommendations

All submitters responded to this question. The results indicate a strong level of support for strengthening the rules relating to Class 4 gambling within the district. A majority of submitters (44, 63%) opposed continuing to allow new Class 4 gambling venues within the district, while 24 submitters (34%) supported continuing to allow new venues (Figure 1). One submission opposing this proposal was jointly submitted by seven organisations and service providers:

I. Problem Gambling Foundation Ltd
II. Purapura Whetū Trust (Māori health, wellbeing and social service provider, Canterbury)
III. Asian Family Services
IV. Te Kāika (Ōtākou Health)
V. Te Piki Oranga
VI. Mapu Maia
VII. Social Services Waimakariri

Two submitters (3%) indicated that they did not know.

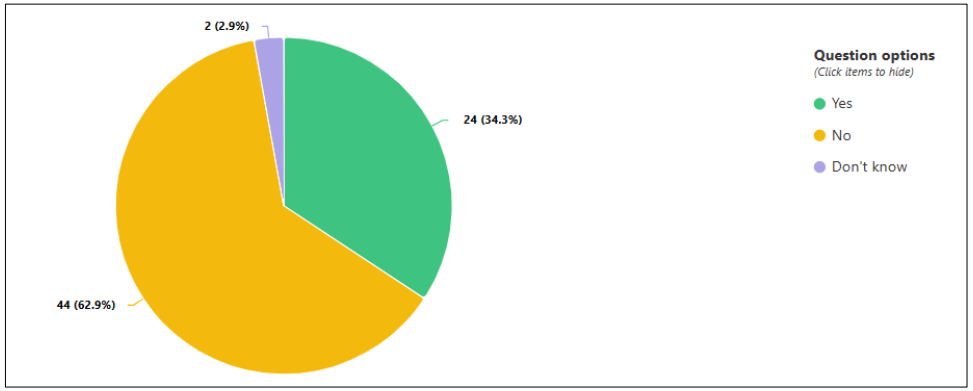


Figure 1: Submitter views on the proposed approach to new Class 4 venue establishment provisions (n[1]=70)

Submitters' reasons for opposing the establishment of new Class 4 gambling venues (Table 1) were grouped under seven themes, as outlined below. Some submitters raised concerns that related to more than one theme.

1. Gambling causes addiction, family harm, financial losses, and wider social harm (27, 61%)
This was the most frequently cited concern.

2. Gambling disproportionately affects vulnerable people, including low-income households (12, 27%)

3. Existing gambling opportunities are already sufficient (11, 25%)

[1] n = Sample size/Number of submitters

4. Gambling provides little or no community benefit (10, 23%)

5. Preference for a sinking lid approach to reduce the number of venues over time (6, 14%)

6. Additional physical venues are unnecessary because online gambling already provides access (2, 5%)

7. Concerns about gambling and alcohol being co-located, as alcohol consumption may contribute to riskier decision-making and increase the likelihood of gambling-related harm (2, 5%)

Note: Percentages do not total 100% because some submitters' comments reflected multiple themes.

Recommendation/s -Officers acknowledge the concerns raised by submitters regarding the adverse impacts of Class 4 gambling. These issues were also identified through the social impact assessment undertaken as part of the policy review. Further information is available in the Social Impact Assessment of Gambling in Waimakariri (TRIM 260624149960).

In Waimakariri, the availability of Class 4 gambling, measured by the number of electronic gaming machines (EGMs), has remained relatively stable since the 2022 policy review, with a small overall decline in machine numbers. Available evidence also indicates that indicators of problem gambling in the district remain low. Analysis of Council's customer complaint and enquiry database prior to development of the draft Policy did not identify community demand for additional restrictions on Class 4 gambling. Therefore, the available district-level evidence does not justify a more restrictive regulatory approach at this time.

In addition, officers had regard to the potential benefits associated with Class 4 gambling, including grant funding distributed to community organisations and the recreational value that some residents derive from gambling activities. Officers also considered the potential effects of significantly restricting access to Class 4 gambling opportunities, including the possibility that some gambling activity may shift to online gambling platforms.

Accordingly, no amendment to the draft Policy is recommended.

Table 1: Submitter comments opposing provisions allowing the establishment of new Class 4 gambling venues

Respondent No	Response ID	Submission comment/s
1	6854504	Because we already have more than enough gambling facilities. We don't need any more social harm that they cause.
2	6859744	Gambling is addictive and many who participate can least afford it. Fewer opportunities rather than more is my preference
3	6860039	No, there is already plenty of locations
5	6862631	No comments
6	6864379	They are a blight on society.
7	6864385	No, gambling, especially slot machines, have no benefit and simply take money from the easily influenced. They're actively harmful to society.
8	6864394	No. No good comes from gambling, at all, ever.
9	6864399	Honestly the last thing this community needs,
11	6864408	Gambling is terrible for families and the individuals.
13	6864412	I am totally against gambling. If people want to gamble, they can do so at home online. I'm opposed to public gambling outlets altogether.
14	6864427	Enough if not too many gambling opportunities already.
15	6864431	Gambling should not be expanded; it preys on the weak in the hope of riches.
16	6864435	There are no positives in relation to gambling. We should be restricting it, not increasing it.
17	6864437	Gambling should be discouraged. The reasons are obvious and well known.

18	6864457	No comments.
19	6864461	Gambling affects the most vulnerable people in our community so a sinking lid policy is what I would prefer.
20	6864466	There are sufficient venues already.
22	6864491	Gambling is an addiction, it ruins families and, in the majority, the only winners are the machines (where they are housed) The council should take a massive lead here and stop even considering it. However, if they fail to heed the call, then it comes to a vote All councillors and Mayoral team who are involved in the vote should be named as for or against so come the next election the people of Waimak can see how responsible their representatives are.
25	6864550	I like to play the pokies. But- had a son in law who gambled away his marriage. There is too much advertising of TAB on TV. Stick with existing number of pokies- down size number if opportunity arises.
26	6864561	We already have gambling establishments where liquor is served and this is totally unethical bearing in mind the liquor licencing act is so strict. When people are under the influence of alcohol they are more likely to gamble way more than they can afford its unacceptable to put that temptation in peoples way. Online gambling is readily available and causing harm to families and the community.
28	6864632	There are plenty already.
29	6864707	Not interested in gambling hard earned money away.
30	6864723	Because there is a big problem for those who cannot manage their money there are enough gambling outlets now without increasing the supply.
31	6864742	Gambling is as bad as using drugs, its side effects cause family and social harm. Can involve a criminal element
32	6864753	I don't approve of gambling.
33	6864782	Causes poor/addicted people to lose money - need to stop it.
34	6864881	Only in a replacement of one if one is removed.
35	6864892	Gambling adds nothing to a community; it adds risks to vulnerable people. I feel it degrades a community by feeding addiction problems.
37	6864984	The evidence of the harm caused by gambling is clear and evidenced. The amount of money being removed from our residents is significant relative to the value contributed to the economy. The income of the people in our community is low - only 10% earning over $100k. In the current climate of cost-of-living crisis, many are finding it challenging to survive. In times of stress people look for opportunities to escape or make a quick buck. Gambling makes many lives worse - well beyond the person with the addiction. I personally identified fraud in a business driven by a gambling addiction and that person went to jail, the business was harmed financially and the impact on other staff (not to mention his family) was widespread. This was not a reported problem gambler who would appear in statistics. This was hidden. The social impact report wildly understates the impact of problem gambling. I also was personally impacted by a young person (under 18) with a gambling addiction, and it destroyed family relationships as well as causing financial harm. The benefits quoted are overstated e.g. staffing is minimal. The work is light touch and unlikely to result in incremental headcount changes. These people are performing other roles. There is very little social benefit to gambling. These people sit focused on the screen with limited engagement with those in the room. Kids are fascinated by these gambling rooms - the colours, the screens and the noise. It is completely wrong. Cigarettes aren't allowed pictures, colours, branding and must be hidden now. Do the same with these machines - black and white screens, minimal graphics, no sound effects, no jackpot signs. We cannot allow this to continue simply because community bodies rely on funding. Relying on the monies generated from the financial harm inflicted on others is not an acceptable answer. That's like saying that we can't ban smoking because the government relies on the tax income.
39	6864995	Awful harm to a close family member. Very destructive.
40	6865009	Not necessary to have any more.
41	6865243	It is too easy for people to gamble away money they cannot afford,
43	6865350	Gambling is a net negative to people and the economy
44	6865371	Any gambling is harmful.
46	6866141	Gambling is addictive and as such damages families and wider society.

50	6866457	There's enough already. Every pub and club has them don't need more
51	6866537	Gambling brings many sins in our society people.
52	6866613	We don't need any more gambling venues. Most gambling sites can be accessed online.
53	6867318	Retaining the current policy with only minor administrative updates fails to address the ongoing social and financial harm caused by Class 4 electronic gaming machines (pokies) in our community Pokies are widely recognized as the most damaging form of venue-based gambling. Western Australia demonstrates the power of this approach, where banning suburban pokie machines—restricting them solely to Perth's central casino—has successfully protected local communities and drastically reduced neighbourhood gambling harm. Maintaining existing venue caps allows high levels of machine density to persist indefinitely. I strongly urge the Council to adopt a strict Sinking Lid Policy (with no relocation or merging permissions), ensuring that as venue licenses surrender or lapse, total machine numbers across the Waimakariri District systematically and permanently decrease over time to protect local families and vulnerable residents. Follow Perth's example and take the lead in protecting our community members, it can be done and it has a good long- term impact.
56	6869163	Gambling can become addictive. All gaming machines and online gambling platforms are highly designed to engage and reward gambling with the use of noises and icons etc, that can be difficult for a person to disengage from. People seldom leave a gaming platform wishing they had spent more time or money there! They usually leave feeling regret and shame. Recreation facilities other than gambling can be more positive for the community.
57	6869251	Gambling never does a community any good.
60	6870677	I think gambling is an issue and no more places should be open.
65	6878848	Detailed submission submitted via email (TRIM 261013323532) Gambling harm is a significant public health issue that affects not only individuals who gamble, but also their families, whānau, and wider communities. Gambling harm may include physical and mental health impacts, family violence, relationship breakdown, disruptions to work or study, financial hardship, and crime. These harms are often linked to financial stress, social isolation, and family conflict, which compound over time and reduce wellbeing. Recent national data show that gambling harm is widespread. One in five New Zealand adults are affected by gambling harm at some point in their lives, either through their own or others' gambling.
69	6879283	Detailed submission submitted via email (TRIM 261013321854) A joint submission that represents views of following seven organisations'/service groups. I. Problem Gambling Foundation Ltd II. Purapura Whetū Trust (Māori health, wellbeing and social service provider, Canterbury) III. Asian Family Services IV. Te Kāika (Ōtākou Health) V. Te Piki Oranga VI. Mapu Maia VII. Social Services Waimakariri Key points relevant to the question: Unlike many councils, Waimakariri does not have a sinking lid policy. Relocations are allowed, meaning machines can move into new neighbourhoods, potentially increasing exposure and harm in vulnerable communities. It is estimated that about one in five people in New Zealand will experience harm in their lifetime due to their own or someone else's gambling. The impact of harmful gambling is diverse, affecting multiple domains of health and wellbeing, including physical, social, emotional, and mental health. However, according to the Ministry of Health client intervention data, only nine clients were assisted in the Waimakariri District in the 2022/23 financial year.

		Gambling harm disproportionately impacts Māori and Pacific peoples, and these populations have been identified in the Ministry of Health's Strategy to Prevent and Minimise Gambling Harm 2022/23 to 2024/25 as bearing a burden of harm that greatly outweighs that being experienced by other groups. According to the 2023 Census, 9.9% and 1.6% of Waimakariri District's population are Māori and Pasifika, respectively. Consideration of how Class 4 gambling inequitably impacts these groups must be deliberated and addressed.

Submitter responses supporting the proposed new Class 4 venue establishment provisions (Table 2) were categorised into six themes, as presented below:

1. Community funding (8 submissions, 33%)
2. Preference to support growth and meet the needs of a growing district (8 submissions, 33%)
3. Preference for regulation rather than complete prohibition (7 submissions, 29%) – One submitter recommended preventing new venues from being established in areas of high socio-economic deprivation where the risk of gambling harm may be greater.
4. Gambling is a legitimate form of entertainment (5 submissions, 20%)
5. Concerns about unintended consequences of restrictive policies (4 submissions, 17%)
6. Personal choice and adult freedom (3 submissions, 12%)

Note: Percentages do not total 100% because some submitters' comments reflected multiple themes.

Recommendation/s

Officers acknowledge the reasons submitted in support of the proposed new Class 4 venue establishment provisions.

The draft policy assists in achieving the purpose of regulating Class 4 gambling within the district to minimise gambling-related harm while providing flexibility for responsible gambling activities.

No amendment to the draft policy is recommended.

Table 2: Submitter comments supporting provisions allowing the establishment of new Class 4 gambling venues

Respondent No	Response ID	Submission comment/s
4	6862471	The population in increasing and availability of gambling opportunities should mirror that growth. Class 4 gambling provides tangible benefit to the community.
10	6864407	No comments.
12	6864411	No comments.
21	6864482	No comments.
23	6864534	No comments.
24	6864535	I support allowing new Class 4 gaming venues in the Waimakariri District, provided they operate under the strict controls and harm minimisation measures outlined in the Council's policy. While gambling can have negative impacts for some individuals, Class 4 gaming venues also deliver significant benefits to local communities through the distribution of grants to sports clubs, community organisations,

		cultural groups, and charitable initiatives. Many community groups rely on this funding to deliver programmes, maintain facilities, purchase equipment, and create opportunities for local residents. The Council's review of the policy recognises both the benefits and potential harms associated with gambling and seeks to maintain an appropriate balance between the two. As Waimakariri continues to grow, there is merit in allowing appropriately located and well-regulated gaming venues that contribute to the local economy and help retain community funding within the district. New venues are subject to clear policy requirements regarding location, licensing, and suitability, ensuring that gambling activity remains a secondary component of hospitality venues rather than their primary purpose. Allowing carefully managed growth in the sector provides adults with access to regulated entertainment options while generating funding that can be reinvested directly into community wellbeing, sport, recreation, and social development across the district.
27	6864583	Fairness to new communities
38	6864985	Because people should be free to spend their money as they wish.
42	6865279	No comments.
45	6865522	Its a personal choice to use facilities such as these and the grant funding opportunities for the wider area clubs and schools will be a positive to ensure that teams, clubs and schools can access resources, attend tournaments etc. as a result of gaming machine grant funding.
47	6866300	Because Gambling is another harmful addiction that creates family violence and abusive relationships within our communities. It takes money away from families and people starve and go without everyday needs in order for people to support their addiction.
48	6866306	Obviously, the council has evaluated the lesser of the 3 levels under consideration. Not a great supporter of the vagaries of gambling it is realised that the councils proposal is better than it going underground and then attached to gangsterism .
54	6867671	As long as the venues used continue to be monitored for the correctness and legality of their operations and that the profits continue to back to the local community for social improvements and gambling awareness
55	6868540	The Gaming machines give a lot of fun and pleasure to the majority of users. The proceeds from the machines are a significant help to many local sporting groups and others.
58	6869274	It is important that the local council has the authority to decide on class 4 venues and numbers of machines as it knows best the size and needs of a fast growing area.
59	6870120	Yes, I think any person above 22 years should be able to gamble, if they are willing to do so.
61	6872281	Good to have a variety of entertainment in a growing district.
62	6873934	Yes, I think we have the balance right with the numbers of venues & machines available
63	6874520	No comments.
64	6877818	No comments.
66	6879209	Detailed submission submitted via email (TRIM 261013321888) Key points relevant to the question: Retaining the current policy allows for growth and ensures that gaming remains a safe, responsible, and enjoyable form of entertainment for residents, while currently contributing an annual benefit of $1,956,866 to the Waimakariri community.
67	6879246	Detailed submission submitted via email (TRIM 261016335145). Key points relevant to the question: Gambling is a popular form of entertainment that most New Zealanders participate in. Any reduction in the local gaming machine offering may have unintended consequences, as this may simply lead to a migration of the gambling spend to offshore internet- and mobile-based offerings. While it is illegal to advertise overseas gambling in New Zealand, it is not illegal to participate in gambling on an overseas-based

		website or mobile phone application.
68	6879249	Detailed submission submitted via email (TRIM 261016335152). Key points relevant to the question: Reducing machine numbers has not reduced gambling harm. Over the past decade, machine numbers have dropped by 25%, yet problem gambling rates have plateaued. Restrictive policies risk reducing community funding and accelerating the migration of gambling spend to online gambling.
70	6881278	Detailed submission submitted via email (TRIM 260914278551). Key points relevant to the question: Accepts new venues under the current policy framework but seeks stronger restrictions on their location and approval. For example, the submission recommends exclusion zones and harm-minimisation measures, including preventing venues from being located near sensitive sites such as schools, churches, social service providers, and areas of high socio-economic deprivation. It also supports using harm mapping and deprivation data to guide decisions and prevent venue clustering.

5. Analysis of Submissions on Retaining the Current Per Capita Cap

Question 3 - Do you support continuing the current per capita cap of one electronic gaming machine (EGM) per 260 residents aged 18 years and over to manage the number of EGMs in the district? Please note that this is equivalent to 38 EGMs per 10,000 residents aged 18 years and over.

Question 4- Please tell us the reason for your answer above.

Relevant Policy Section: 5.2 Per Capita Cap Policy

Officer analysis and recommendations

Of all submitters who responded to this question, the largest proportion (41, 59%) did not support continuing the current per capita cap, which is Council's preferred option (Figure 2). Twenty-seven submitters (39%) considered the proposed option appropriate, while two submitters (3%) indicated that they had no view on the matter.

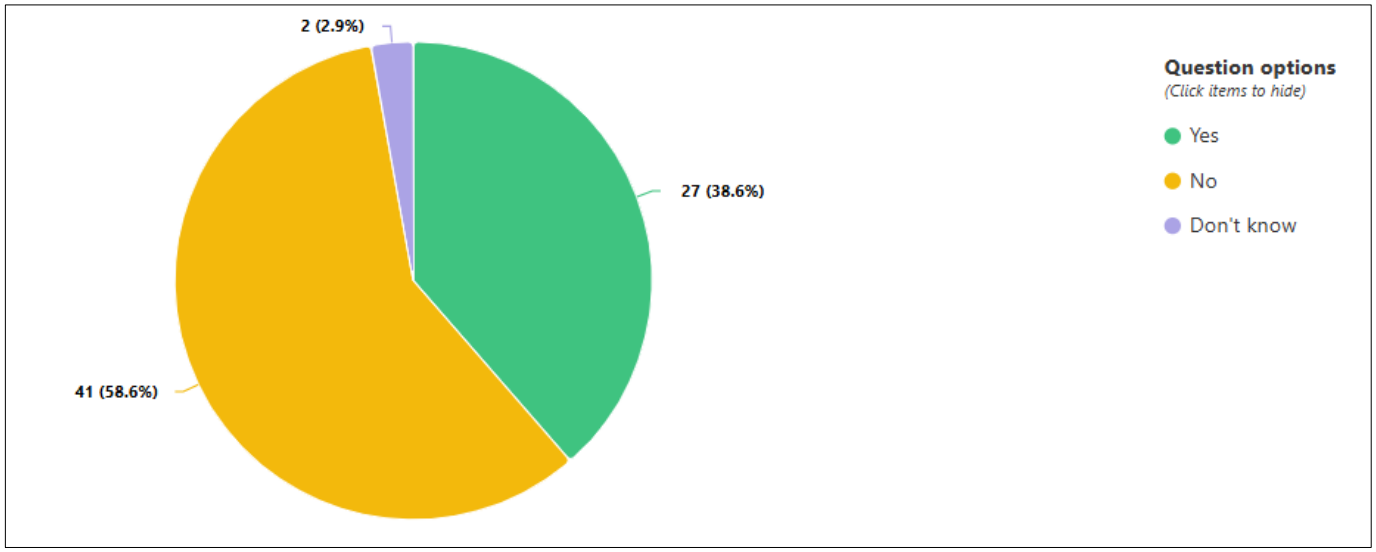


Figure 2: Submitter views on maintaining the current limit of 38 EGMs per 10,000 residents aged 18 years and over (n=70)

Reasons for opposing the current per capita cap

The reasons submitters gave for not supporting the current per capita cap were grouped under the following themes:

1. Preference for a sinking lid policy and view that the current cap is too high (20, 51%)
2. Gambling harm and addiction concerns (15, 37%)
3. Preference for banning EGMs entirely (6, 15%)
4. Support for increased availability or personal choice (4, 10%) – A small number of submitters opposed continuing the current cap because they favoured greater access to gaming opportunities and emphasised individuals' right to make their own gambling choices.
5. Preference for online gambling instead of local EGMs (1, 2%)

Note: Percentages do not total 100% because some submitters' comments reflected multiple themes.

The impact of the current per capita cap is best understood by considering several factors together, rather than relying solely on the cap itself. These factors provide a broader picture of the potential and actual availability of Class 4 gambling within the district and can be assessed through comparison of the following measures:

a) **Current per capita cap** – The maximum number of EGMs permitted per 10,000 adults under the policy.

b) **Adult population (based on the 2023 Census)** – Changes in the district's adult population directly affect the maximum number of EGMs permitted under the per capita cap.

c) **Actual number of EGMs operating in the district** – The number of EGMs currently operating in the district is lower than the maximum number permitted under the policy.

d) **Actual EGM density** – The number of EGMs per 10,000 adults based on the machines currently operating in the district. This provides a measure of actual EGM availability in practice.

The current per capita cap was introduced during the 2022 review. While population growth has increased the maximum number of EGMs that could be permitted under the per capita cap, the number of operating EGMs has slightly decreased from 165 in 2022 to 163 in 2026. As a result, actual EGM density has reduced from approximately 36 EGMs per 10,000 adults in 2022 to 31 EGMs per 10,000 adults in 2026. This indicates that EGM availability relative to the adult population decreased between 2022 and 2026 (Table 3). Accordingly, continuation of the current per capita cap, combined with limited growth in EGM numbers and a growing adult population, has resulted in lower Class 4 gambling availability than would otherwise have occurred under the policy. This suggests that the existing policy settings are continuing to achieve a degree of restraint without the need for additional restrictions at this time.

Table 3: Comparison of EGM Availability Under the Current Per Capita Cap, 2022 and 2026

Measure	2022	2026	Change
Adult population (18+)	45,165	51,864	+6,699
Per capita cap	1 EGM per 260 adults (38 EGM: 10,000 adults[2])	1 EGM per 260 adults (38 EGM: 10,000 adults)	No change
Maximum EGMs permitted under cap	172	197	+25
Actual EGMs operating in the district	165	163	-2
Actual EGM density (EGMs per 10,000 adults)	36 (round up)	31 (round up)	-5.1

Recommendation/s - Officers also note that problem gambling rates within the district remain comparatively low and there is no clear evidence of growth in EGM numbers or venue expansion under the current policy settings. On this basis, officers consider that the existing per capita cap continues to provide an appropriate balance between limiting EGM availability and accommodating population growth. **Accordingly, no amendments to the draft policy are recommended at this time.**

Officers acknowledge that future growth in EGM numbers could alter this position. Should the district experience a significant increase in EGM numbers or gambling-related harm indicators over the next three years, Council may need to reconsider the appropriateness of the current per capita cap and assess whether more restrictive policy settings are warranted as part of the next policy review, currently scheduled for late 2029.

[2] As the number of machines is generally expressed as a whole number, rounding was applied, resulting in a cap of 38 EGMs per 10,000 adults.

Reasons for supporting the current per capita cap

The reasons submitters gave for supporting the continuation of the current per capita cap were grouped under the following themes:

1. Current cap is appropriate and balanced (16, 59%)
2. Harm minimisation through regulation (7, 26%)
3. Supports controlled growth alongside population growth without unnecessary restrictions (6, 22%)
4. Community funding benefits (5, 19%)
5. Concern that stricter policies could shift gambling online or into unregulated environments (5, 19%)
6. Existing availability is sufficient (4, 11%) – Four submitters supported retaining the current per capita cap but also commented that the existing availability of EGMs is sufficient and that they did not wish to see any increase in machine numbers. This reflects a distinction between support for the current policy framework and views on future EGM growth. While the per capita cap would allow some additional EGMs as the population grows, these submitters appeared to support the cap as an appropriate and balanced policy setting rather than expressing support for further expansion of EGM numbers.
7. Supports personal choice and recreational gambling (2, 7%)

Note: Percentages do not total 100% because some submitters' comments reflected multiple themes.

Recommendation/s - The policy review process, including the Social Impact Assessment of Gambling in Waimakariri, considered the issues raised by submitters. The draft Policy appropriately balances harm minimisation objectives with population growth and community considerations. **Accordingly, no amendments to the draft Policy are recommended.**

Comments received from submitters explaining their reasons for opposing or supporting the proposal are presented in Tables 4 and 5, respectively.

Table 4: Comments received from submitters not supporting the proposed per capita cap policy

Respondent No	Response ID	**Submission comment/s**
1	6854504	Because we already have too many. If anything the numbers should be reduced.
2	6859744	I'd prefer a slowly sinking lid approach.
3	6860039	Should be less
6	6864379	As above - They are a blight on society.
7	6864385	I would only support 0 (outside casinos anyway).
8	6864394	The appropriate amount of EGMs is zero. They are carefully designed by corporations to be as addictive and predatory as possible.
9	6864399	too high per cap
11	6864408	Electronic gambling machines should be banned
12	6864411	There should be more
13	6864412	Already stated above. Don't encourage gambling. Don't like public gambling

14	6864427	Gambling causes harm for so many of our communities and so should be kept to a minimum
16	6864435	No, the number should be reduced.
17	6864437	Keep reducing the cap
18	6864457	No comments
19	6864461	See above - Gambling affects the most vulnerable people in our community so a sinking lid policy is what I would prefer.
21	6864482	Costs out weight the benefits. Work on a reduction policy - trimming the numbers at each venue by say 1 per year. Increase by say 50 per year.
22	6864491	Lower it, see above - Gambling is an addiction, it ruins families and in the majority the only winners are the machines (where they are housed) The council should take a massive lead here and stop even considering it. However, if they fail to heed the call, then it comes to a vote All councillors and Mayoral team who are involved in the vote should be named as for or against so come the next election the people of Waimak can see how responsible their representatives are
25	6864550	Need to reduce number if pokies
26	6864561	We have more than enough access to gambling online
28	6864632	Gambling is often addictive and harmful to the individual and their families, not just in a financial way. Aim to lessen the number over time.
29	6864707	as previous - Not interested in gambling hard earned money away
30	6864723	As stated above they are bad news people get addicted
31	6864742	The ratio should be decreased
32	6864753	I don’t approve of gambling
33	6864782	Causes poor/addicted people to lose money - need to stop it. They are programmed to be addictive, with an expected return of 0.9, so are guaranteed in the long term to lose all money.
37	6864984	The harm report has recommendations from all gambling harm organisations that a sinking lid policy is recommended and there seems to be referenced to evidence around this. This has been ignored by the draft policy. Make positive change for the community and adopt a sinking lid policy.
39	6864995	Any EGM is too many. They do no good.
40	6865009	i think that this is to many EGM.
42	6865279	No we could make it so there are more per person
44	6865371	s.2.-Any gambling is harmful
46	6866141	I do not support there being any gambling machines.
50	6866457	Per capita isn't relevant to the harm It just ads more places for gambling addiction as the region grows Makes more harm.
51	6866537	Gambling machines will destroy life of society residents.
53	6867318	We need to replace these machines with real community activities especially for our elderly and young people, The existing Waimakariri policy caps pokie machines based on a ratio (e.g., 1 machine per 260 adults). Because Waimakariri (Rangiora, Kaiapoi, Pegasus, Rolleston area) is experiencing steady population growth, this population-based cap allows new gaming machines to be added to the district as the resident population grows. Removing population-tied increases entirely and replacing them with a strict numerical cap or a Sinking Lid Policy. Growth in resident numbers should not automatically create room for additional pokie licenses.
55	6868540	The per capita rate should be increased to allow venues the ability to have a variety of games and be able to introduce new games. Need greater use of machines to have greater proceeds for local sporting groups. Lotto outlets are more blatant in their positioning and advertising which takes money out of the Community.
56	6869163	The human brain does not mature fully until age 25. Addictions and behaviours formed earlier in life are more difficult to modify and change as they become the normal behaviour for the young person. The minimum age for gambling should be 25 years
57	6869251	People waste their hard earned money on these machines. Times are going to get tougher soon with a world wide depression.
65	6878848	Te Waipounamu strongly recommends that Council implements a sinking lid policy. As stated in our previous feedback, we recommend that Council adopts a sinking lid policy that bans the establishment of any new Class 4 venues in the district. A sinking lid policy gradually reduces the number of gaming venues and machines overtime by restricting new licenses and replacements. A

		sinking lid policy is one of the most effective policy interventions available to reduce the number of pokie machines, expenditure on pokie machines and the associated gambling harm.21 Gambling availability is a key driver of gambling participation and expenditure, therefore, maintaining a sinking lid approach remains important to reduce exposure and associated harm. By adopting a sinking lid policy, Waimakariri District Council would join the growing number of local authorities adopting sinking lid policies. Currently, over half (55%) of councils in Aotearoa New Zealand have adopted a sinking lid policy. Councils that implement sinking lid policies have seen reductions in the number of gaming machines, venues, and overall Class 4 gambling expenditure. Our primary recommendation is to adopt a sinking lid policy. If Council decides not to adopt a sinking lid, we recommend introducing an absolute cap of 163 Class 4 gaming machines. This would maintain the current number of Class 4 gaming machines in the district and prevent any growth in the Class 4 gambling ecosystem. We do not support the proposal to maintain the per capita cap on gaming machines in the district. The maximum number of permitted machines has increased in the proposed policy because the Waimakariri population has grown. Currently, there are 163 machines in Waimakariri, and the proposed policy allows up to 197 machines, meaning the number of machines could grow by 34. This is almost a 20% increase in the number of gaming machines and could lead to increased gambling opportunities and therefore more gambling harm. Please refer to the written submission for further details (TRIM 261013323532).
69	6879283	We note that Council's proposal to retain its current per capita policy could lead to a significant increase in pokie machines. There are currently 163 machines in Waimakariri District. The proposed policy would allow a maximum of 197 - an increase of 34 machines. Therefore, there is potential for the number of machines to grow by almost 20%, which is a significant increase. Population growth does not create an automatic case for more pokies. Per-capita formulas make sense for infrastructure with clear social utility – more people create demand for schools, housing, transport and health services. Pokie machines are fundamentally different: they are a high-risk, high-harm product. There is no equivalent social need to maintain one machine for every 260 residents. The 1:260 ratio should therefore be a ceiling, not a target continually replenished as Waimakariri grows. If population increases while machines remain at 163, falling machine density is a harm-minimisation gain – not a problem Council needs to correct. The question is not whether we can prove precisely how much harm another 30+ machines will cause. What evidence demonstrates Waimakariri needs another 30+ machines in the first place? Please refer to the written submission for further details (TRIM 261013321854)
38	6864985	Doesn't make a difference if there is 1 machine or 100 in a venue
45	6865522	I assume that by advocating for the initial questions this question serves to be the other side of the coin. Again while these machines can have a negative impact to select members of society this is a personal choice, same as going to the pub or buy vapes, smokes etc. addictive but not compulsory...

Table 5: Comments received from submitters supporting the proposed per capita cap policy

Respondent No	Response ID	
4	6862471	It sets a limit on the overall availability of gaming machines which is sensible and is based in logical reasoning.
10	6864407	No comments
15	6864431	We have them but don't need to grow them.
20	6864466	No comments
23	6864534	No comments

24	6864535	I support allowing new Class 4 gaming venues in the Waimakariri District and continuing the current policy of one gaming machine per 260 residents aged over 18 years. I believe this approach provides a sensible balance between harm minimisation and the significant benefits that Class 4 gaming funding delivers to local communities. Community grants generated through gaming machine proceeds provide vital support for sports clubs, community organisations, arts groups, and charitable initiatives, many of which would struggle to access alternative sources of funding at the same level. The current policy framework also ensures that gaming venues are subject to appropriate regulatory controls and location requirements, helping to manage potential social impacts while still allowing community organisations to benefit from funding generated locally. As Waimakariri continues to experience population growth, maintaining the current ratio of one machine per 260 adults is a practical and measured approach that allows gaming opportunities to grow proportionately with the community rather than imposing arbitrary restrictions. Retaining this per capita provision helps ensure that community grant funding keeps pace with the needs of a growing district while supporting local hospitality venues and maintaining consumer choice for adults who choose to participate in this form of entertainment. I believe the existing policy has struck an appropriate balance between controlling gambling growth and preserving the substantial community benefits that gaming machine funding provides, and therefore I support its continuation.
27	6864583	It's enough gambling is a social issue.
34	6864881	There is no need to encourage more gambling by providing more venues. If one is interested in gambling, the venues that provide that are in ample supply
35	6864892	I think it is a reasonable ratio
36	6864967	No comments
41	6865243	There is no need to have more
43	6865350	AS much cap as possible
47	6866300	The less machines the less opportunities for people to gamble. I personally think the number of machines per venue should be lowered and the times they operate.
48	6866306	see above
52	6866613	Don't increase the number of EGMs. I wouldn't mind if the number was decreased.
54	6867671	It appears that the number of gaming machines per head of population is about right
58	6869274	This policy is working very well and enables the council the space to add venues as required in this growing community.
59	6870120	See my answer for question number 2. I also think this capped 38 EGM per 10000 residents isn't preventing people to gamble.
60	6870677	I don’t not think there should be an increase
61	6872281	No comments
62	6873934	Yes, I think the number of machines is about right.
63	6874520	No comments
64	6877818	Clubs New Zealand supports the Council's proposal to retain the existing Class 4 Gambling Venue Policy with only minor administrative amendments. We believe the draft policy appropriately balances the need to minimise gambling-related harm while recognising the legitimate role that Class 4 gaming plays in supporting valuable community outcomes. Please refer to the written submission for further details (TRIM 261012309767).
66	6879209	 Supports retaining the current cap because it allows for controlled growth while maintaining gaming as a regulated and responsible form of entertainment. Provides significant community benefits, with gaming grants contributing approximately $1.96 million annually to the Waimakariri community. Problem gambling rates in New Zealand are low, and the vast majority of people gamble without experiencing serious harm. The Class 4 gaming sector is heavily regulated, with strict harm minimisation requirements, staff training, and funding for

		problem gambling services. A sinking lid policy is unlikely to reduce gambling harm, as people may shift to online gambling, which has fewer controls and does not provide community grants. Reducing gaming machines could threaten community funding for local non-profit organisations and community groups. Gaming venues provide social and entertainment benefits that online gambling does not. Supports evidence-based regulation rather than restrictive policies, arguing that current controls effectively manage risks while preserving community benefits. Please refer to the written submission for further details (TRIM 261013321888).
67	6879246	The current cap is reasonable given the current environment of high regulation, Waimakariri's population growth, and the expansion of online gambling. There is no direct correlation between gaming machine numbers and problem gambling rates. Over the last 15 years, the problem gambling rate has remained static, despite gaming machine numbers declining by over 25%. The 2012 National Gambling Survey7 concluded that the prevalence of problematic gambling reduced significantly during the 1990s and has since stayed about the same. Adopting a more restrictive policy is unlikely to reduce problem gambling, but will, over time, reduce the amount of funding available to community groups based in Waimakariri District. Reducing gaming machine venues reduces casual and recreational play, and therefore reduces machine turnover and the amount of money generated for grant distribution. However, problem gamblers are people who are addicted to gambling. If a new bar is established and the policy prevents that bar from hosting gaming machines, a person who is addicted to gambling will simply travel the short distance to the next bar that has gaming machines, or worse, may move to another form of gambling such as offshore-based internet and mobile phone gambling. Please refer to the written submission for further details (TRIM 261016335145).
68	6879249	Kiwi Gaming Foundation receives grant requests that exceed the amount of local funding generated. Retaining a policy that allows for a small amount of additional growth will help to keep the current level of community funding sustainable and avoid an even higher level of funding unavailability. The population-based cap is reasonable given the significant community funding that is generated from the gaming machines, the positive economic impact of the machines, and the growth of online gambling. Please refer to the written submission for further details (TRIM 261016335152).
70	6881278	Support continuation of the existing policy framework, subject to stronger safeguards and monitoring. Although the current per-capita cap is supported, it is not considered the preferred approach, as it allows an increase in the number of EGMs. Please refer to the written submission for further details (TRIM 260914278551).

6. Analysis of Submissions on the Relocation Policy

Question 5 - The current policy allows Class 4 gambling venues to be relocated under certain conditions. Do you think the current relocation rules should remain the same?
Question 6 - Please tell us the reason for your answer above.

Relevant policy section: 5.5 Relocation policy

Officer analysis and recommendations

All submitters responded to this question. The largest proportion of submitters (28, 40%) supported retaining the current relocation rules for Class 4 gambling venues (Figure 3). An equal proportion of submitters opposed retaining the current rules (21, 30%) and indicated that they did not know whether the rules should remain the same (21, 30%).

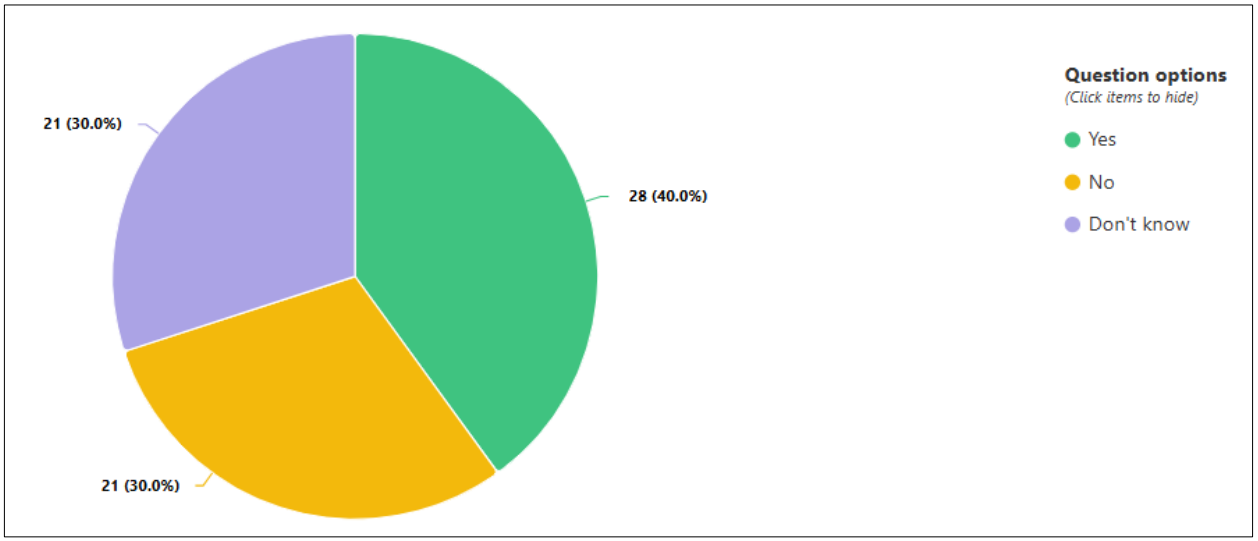


Figure 3: Submitter views on retaining the current relocation policy (n=70)

Reasons for supporting the current relocation policy

Those who supported retaining the current relocation policy provided the following reasons:

1. Perceived the current relocation policy as appropriate (14, 50%).
2. Considered relocation to be a fair and practical business provision that enables movement to more suitable locations (5, 18%).
3. Supported retaining the policy to help maintain community funding (1, 4%).
4. Supported relocation but suggested additional location restrictions and harm-minimisation measures (1, 4%).
   Additional location restrictions suggested included:
   - Inclusion of an additional criterion restricting the relocation of venues and EGMs into areas of high socio-economic deprivation, at a minimum.
   - Reinforcement of strict exclusion zones around high-deprivation areas, schools, churches, and social service providers (including violence prevention, mental health, and addiction support services).
   - Prohibition of venue clustering within a specified radius (e.g., 1-2 km) to avoid the oversaturation of gambling venues in any one community.

Two submitters who supported retaining the current relocation policy expressed concern that any changes to the policy would be outside the scope of the current consultation (Response IDs 6879249 and 6879246), as the Statement of Proposal presented retention of the current relocation policy as Council's preferred approach.

Although two submitters selected support for retaining the current relocation policy, their comments did not provide a clear rationale for supporting the policy (Response ID 6864707 and 6866300). Instead, the comments reflected general concerns about gambling and the availability of gambling venues.

Table 6 presents comments from submitters who supported the current relocation policy.

Reasons for opposing the current relocation policy

Reasons for not supporting the retention of the current relocation policy were:

1. Concerns about gambling harm and a preference for reducing or eliminating gambling (19, 90%).
2. Support for tighter location and regulatory controls (2, 10%).
   It was suggested that the current relocation policy be strengthened by prohibiting the relocation of venues into socio-economically deprived areas (e.g. deprivation deciles 7-10).
3. The current relocation policy is too restrictive (1, 5%).

Table 7 presents comments from submitters who opposed the current relocation policy.

Recommendation/s - Officers acknowledge the comments provided by submitters. There is no clear evidence that the current relocation settings are undermining the policy objectives in Waimakariri. Relocation does not increase the number of venues or EGMs and may help reduce the concentration of venues in some areas. **Based on this, no amendments to the draft policy are recommended.**

Table 6: Comments from submitters who supported the current relocation policy

Respondent No	Response ID	Submission comment/s
1	6854504	There is no good reason to change.
4	6862471	Allowing relocations maintains a consistent level of community funding. Legislation prevents new venues from operating more than 9 gaming machines. Venues licensed before October 2001 possess "grandfather" entitlement to operate up to 18 gaming machines. Generally speaking, those venues are the workhorses of the sector, generating larger amounts of community funding. Events such as fire, earthquake, lease expiry and demolition fall outside of an operator's control, yet they can have a devastating effect on their business. That damage is exacerbated in situations where an operator loses the ability to continue operating a significant portion of their business.
6	6864379	No comments
10	6864407	No comments
12	6864411	No comments
15	6864431	I have no problem with the status quo just growth.

17	6864437	Yes - provided there is no increase in availability or visibility
20	6864466	Relocation requires the new location to fully comply with the policy.
23	6864534	No comments
24	6864535	I support retaining the ability for Class 4 gaming venues to be relocated, subject to appropriate conditions and Council approval. Relocation provisions provide flexibility for venue operators when circumstances change, while ensuring that any new location remains suitable and complies with policy requirements. This approach allows gaming activity to be moved to more appropriate premises where necessary, without increasing the overall number of gaming machines or undermining the policy's harm minimisation objectives. As Waimakariri continues to grow, maintaining both the current machine-to-population ratio and sensible relocation provisions will help ensure that community funding remains available to support local sport, recreation, community development, and charitable activities across the district.
26	6864561	Its more than enough considering the availability of online gambling advertised on tv contently
27	6864583	Rules seem sensible now.
29	6864707	as above - Not interested in gambling hard earned money away
34	6864881	Fair to relocate if the venue is suitable and meets the council's standards
42	6865279	No comments
43	6865350	If they have it they should not have it taken away from just relocation
47	6866300	Less places to game the better
54	6867671	Sometimes, venues no longer meet the licensing criteria required, for whatever reason. It needs to be made fairly straightforward under those circumstances to be able to shift to appropriate vetted venues
58	6869274	Sometimes this is necessary and venues should not be unfairly penalized.
60	6870677	As long as there are conditions
61	6872281	No comments
62	6873934	No comments
63	6874520	No comments
64	6877818	No comments
66	6879209	The status quo relocation policy is sensible and should be retained. A workable relocation provision allows venues to move to more suitable premises, protects operators from onerous lease terms, and supports re-establishment following unforeseen disruptions such as fire or natural disaster.
67	6879246	Supports the proposal. It is noted that changes to the existing relocation policy fall outside the scope of this consultation. Any such changes would therefore require a separate consultation process. Please refer to the written submission for further details (TRIM 261016335145).
68	6879249	Supports the proposal. The Foundation notes that changes to the current relocation policy fall outside the scope of this consultation. Please refer to the written submission for further details (TRIM 261016335152)
70	6881278	We support the relocation with following restrictions •inclusion of an additional criterion restricting the relocation of venues and EGMs within areas of high socio-economic deprivation at a minimum, reinforcement of strict exclusion zones around high-deprivation areas, schools, churches, social service providers (including violence prevention and mental health and addiction support services)

		• use of harm mapping and socio-economic data to guide location decisions and prevent new venues from being established in areas already at higher risk of experiencing gambling harm • prohibition of venue clustering within a specified radius (e.g., 1–2km) to avoid the oversaturation of gambling venues in any one community. Please refer to the written submission for further details (TRIM 260914278551).

Table 7: Comments from submitters who opposed the current relocation policy

Respondent No	Response ID	Submission comment/s
2	6859744	Prefer a sinking lid, so relocation requests are an ideal time to sink the lid!
8	6864394	If you close, you close. End of story.
11	6864408	Abolish them
13	6864412	I prefer Option 2 of the gambling amendments.
22	6864491	Need the places to be set away from garages and supermarkets to be a controlled centre for the Lotto and a similar set up to cover PRIVATE clubs only
25	6864550	Don't relocate. Reduce number if pokies
30	6864723	Get rid of them all
32	6864753	I don’t approve of gambling
33	6864782	Shouldn’t be allowed anywhere
37	6864984	I believe all gambling harm organisations recommended against this. Why is this ignored?
40	6865009	these should not be allowed to be relocated
44	6865371	s. 2.-Any gambling is harmful
46	6866141	I do not believe we need gambling venues in Waimakariri
50	6866457	We should be looking at keeping gambling where it is, relocating is a good opportunity to decrease gambling. We do to need gambling everywhere. I'm a gambler even i think there's too much temptation
51	6866537	Gambling machines should be withdrawn in our region.
53	6867318	No relocation, If a venue shuts down or moves, the licence to operate those pokie machines should expire completely rather than being transferred to a new suburban location. Explicitly incorporating Deprivation Index mapping into planning rules. Council should prohibit any new or relocated venue within high-deprivation mesh blocks or within a set radius (e.g., 200–500 metres) of pawnshops, quick-loan lenders, or social service providers.
55	6868540	Current rules are far too restrictive,
56	6869163	There should be a grandfathering policy for venues. As one venue closes, the license should be cancelled
57	6869251	I don't support gambling in any shape.
65	6878848	We note that the current policy allows Class 4 venues and machines to relocate. We recommend that Council either bans relocations or prohibits relocations to areas with high levels of socioeconomic deprivation (e.g. deprivation deciles 7 to 10). Allowing the relocation of Class 4 gambling can contribute to the concentration of venues and machines in deprived areas and potentially expose new communities to Class 4 gambling. Please refer to the written submission for further details (TRIM 261013323532).
69	6879283	Allowing relocation means the pokie footprint can shift into new areas, potentially increasing gambling-related harm. Please refer to the written submission for further details (TRIM 261013321854).

7. Analysis of Other Matters Relevant to the Draft Class 4 Gambling Venue Policy

Question 7- Is there anything else Council should consider when making decisions about the Draft Class 4 Gambling Venue Policy?

This question provided submitters with an opportunity to raise any additional matters they felt Council should consider when making decisions on the Draft Class 4 Gambling Venue Policy. A total of 44 comments were received, of which 8 were either outside the scope of the policy and/or Question 7, or sought clarification on specific regulatory and operational matters. The remaining 36 comments, which were relevant to Question 7, are presented in Table 5.

Most comments received reiterated views already expressed in response to Questions 2, 4 and 6. The responses therefore reinforce the key issues identified throughout the consultation process. The main matters submitters emphasised Council should consider were:

1. Gambling harm and protection of vulnerable people (25, 69%)

2. Location-based harm minimisation (5,14%) -Key matters raised under this theme included regulating the proximity of Class 4 gambling venues to sensitive sites such as schools, libraries, and community service centres, as well as preventing the establishment or relocation of venues in socio-economically deprived areas.

3. Community benefits and retaining current policy settings/increase gambling availability (7, 19%)

4. Avoiding overly restrictive rules (2, 6%) - Some submitters expressed the view that gambling is a matter of personal choice and that additional restrictions would not necessarily reduce gambling behaviour.

5. Potential impact of online gambling (1, 3%) - Some submitters raised concerns that reducing access to Class 4 gambling venues may encourage greater participation in online gambling.

6. Operational impacts of further restrictions (1, 3%) – One submitter representing the gaming sector raised concerns that further reductions in the number of venues or gaming machines could concentrate gambling activity in fewer venues, potentially creating operational challenges and increasing patron demand at remaining venues.

Table 8 presents matters raised by submitters for Council's consideration when making decisions on the Draft Class 4 Gambling Venue Policy, while Table 9 presents comments received for Question 7 that are outside the scope of the question, along with explanatory notes.

Recommendation/s - Officers acknowledge all matters raised by submitters in response to Question 7. Regulating the proximity of Class 4 gambling venues to sensitive sites and restricting venue locations in areas of higher socio-economic deprivation are reasonable considerations in the development of gambling venue policies, as these factors may increase the exposure of vulnerable groups, including young people and those experiencing financial hardship, to gambling-related harm.

Based on the available evidence, there is currently insufficient evidence of a significant issue within the district that would justify introducing additional restrictions beyond those proposed in the draft policy. **Accordingly, no amendments to the draft policy are recommended in response to the matters raised under Question 7.**

Table 8: Matters Council should consider when making decisions about the Draft Class 4 Gambling Venue Policy

Respondent No	Response ID	Submission comment/s
1	6854504	The harm that gambling causes.

4	6862471	Not that comes to mind.
8	6864394	Gaming is incredibly addictive (by design), and harmful.
11	6864408	Destroying families of those who gamble
12	6864411	There should be more
15	6864431	The possibility of greater harm.
22	6864491	Forget their memberships of the places thst house gambling units
23	6864534	Before any change thought needs to be given to the impact a reduction in venues/machines would have on the community services and charity space. Unfortunately they rely on the proceeds of this industry. Any change needs to consider how in the longer term the community is able to resource these vital community groups that with out them both local and central government would need to find ways to maintain the services they provide.
24	6864535	Overall, I support retaining the current Class 4 Gaming Venue Policy, including the provision of one gaming machine per 260 residents over the age of 18 and the ability for venues to relocate under approved conditions. The existing policy provides an appropriate balance between minimising gambling harm and enabling substantial community benefits through grant funding. As Waimakariri continues to grow, maintaining these settings will help ensure local sporting, cultural and community organisations continue to receive vital financial support while gambling activity remains subject to strict regulatory controls and Council oversight. The current policy appears to be working effectively and does not require more restrictive measures at this time.
26	6864561	As above. Remove gambling establishments from places that supply liquor
27	6864583	Just commonsense please
30	6864723	How many families will be affected by it
33	6864782	The social harm, inequality, mental health issues
35	6864892	reasonable consideration for residents and possible vulnerable groups
37	6864984	Be brave - make a positive change for our community. There are other ways for organisations to get grants - yes it is hard but the community will adapt.
38	6864985	Stop limiting people’s choices. No matter what the number of machines is or the limit of money you can win etc.. even if there is only 1 machine people will still gamble the same… restrictions don’t solve anything
39	6864995	Down with easy access to gambling
40	6865009	Gambling is not good for a healthy community.
44	6865371	s. 2. Any gambling is harmful
46	6866141	Gambling is addictive and as such damages families and society.
47	6866300	Not having gambling machines at places where the drug alcohol is sold or drunk.
48	6866306	As long as it can contain / debar the obsessive punters / those that can least afford it
50	6866457	Reduce the harm do t make it easier
51	6866537	Please abolish gambling system and activities in our society.
52	6866613	Proximity to schools and venues frequented by young adults.
53	6867318	Strengthening exclusion zones around schools, early childhood centres, playgrounds, sports fields, and public libraries to ensure pokie venues and TAB outlets are completely isolated from family-centric areas. Giving proper weight to feedback from health organizations, social services, and problem gambling treatment providers (such as the Problem Gambling Foundation and Te Ngāi Tūāhuriri Rūnanga) who consistently advocate for stronger harm-reduction policies over administrative status-quo options.
56	6869163	The overall impact of gambling in the community is negative- time and money wasted for very little return to the community in the way of community grants. Sadly, many of the individuals who gamble the most are the ones who can least afford it. This brings harm to dependent and often vulnerable children in their care
57	6869251	Please don't increase what is already there.

58	6869274	The current venues are very well run and with Harm minimization requirements and the care we show our patrons this policy should not be used as a tool to stop this social activity which is well managed and controlled. By limiting the growth in a community it could have the opposite affect of it being to busy and unmanageable with to many patrons. As long as the funds are used to promote growth and positive outcomes in the future.
59	6870120	I can't think of any.
60	6870677	Protecting the vulnerable. Not having obvious advertising. Providing resources to help with addition
62	6873934	Would be nice to have more support around technology eg the Players Information which is pre programed breaks where the machine will freeze up & give the player information on time & money spent in that playing session on the screen... (Length of Play) these breaks could give different information or even short videos & the break in play should be longer as the length of play increases. *** the length of play is not always link to one player... its based on how long the machine has been used... EG, I could have been playing for 30 mins, then you use this machine for 30 mins... the machine would think that's its the same player for 60 min. I believe there would need to be a 60 sec break in play for the machine to re set the information. We own a Restaurant with gaming machines...the rules around TAB & Lotto are. TBA offers FREE Bonus cash with some of their adverts & cash backs if you do not win on some of their promotions... The over slight on Lotto with online gaming is pretty relaxed. I think that the rules around Class 4 gaming are pretty tough. I would not like to see them loosen, would be nice to see an even playing field. We currently use a POI system, where we have over 100 excluded players. It is not reasonable to have our staff recognise and know as soon as these players are in the gambling room. Facial recognition would help with harm minimisation and efficiency of our staff to achieve this. No need to be heard by the hearing panel, but if there is any questions or extra information needed, please feel free to email.
65	6878848	As highlighted in the Social Impact Assessment, there are 163 pokie machines across 11 venues in the Waimakariri District, and the number of venues and machines has decreased over time between 2005 and 2025, following a similar pattern to the national picture. Gaming Machine Profits (GMP) were approximately $10.4 million in the Waimakariri District in the year ending December 2025. This equates to approximately $28,500 being lost per day to Class 4 gambling in the district. GMP has continued to grow in the district in recent years; increasing from approximately $9.9 million in 2023 to $10.3 million in 2024. GMP is all the money generated through the use of Class 4 gambling, less the amount paid back as prizes. The figure of $10.4 million is the money that was lost in 2025, so the total money spent on gaming machines was actually much higher when winnings are considered. In the Waimakariri District, the majority of Class 4 gaming machines and venues are in areas with moderate to high socioeconomic deprivation (deciles 7 to 10). Out of the 11 venues in the district, 7 are in deprivation deciles 7 to 10. The concentration of venues in deprived communities highlights the inequitable exposure of socioeconomically deprived communities to gambling. Problem gambling is three times higher in deprived neighbourhoods when compared with those in the lower deprivation quintiles.13 This is reflected in the significantly higher gambling expenditure in deprived areas when compared to more affluent ones. For example, people living in the most deprived areas spend on average up to three times more on Class 4 gambling than those in the least. deprived areas. This is particularly important in the context of Waimakariri District, where currently most of the gaming venues and machines are located in moderate or high deprivation areas.

		While the Gambling Act requires at least 40% of net proceeds to be returned to community purposes, there is no legislative requirement that these funds are redistributed to the communities from which they were generated. Of the $10.4 million lost in Waimakariri District in 2025, only $1,956,866 (approximately 19%) was returned to organisations based in Waimakariri District. Please refer to the written submission for further details (TRIM 261013323532).
68	6879249	In 2025, Kiwi Gaming Foundation made grants totalling $605,976 to Waimakariri District-based community groups. The total amount of gaming machine funding to Waimakariri District-based community groups in 2025 totalled $1,956,868. Gaming societies are the only gambling operators that consistently support grassroots organisations. Other gambling providers, including Lotto NZ, TAB NZ, land-based commercial casinos, and offshore online platforms, do not provide comparable community funding. There is no realistic alternative to this funding. The Council cannot replace millions of dollars in grants, and grassroots organisations cannot rely on central government or commercial sponsorship to fill the gap. A 2022 survey by the Gaming Machine Association of New Zealand2 found: • Over 92% of responders felt it was either impossible or very unlikely that Class 4 funding could be replaced by Government funding (i.e., subsidies or grants). • Over 86% of responders felt it was either impossible or very unlikely that Class 4 funding could be replaced by funding from other charitable trusts. • Over 89% of responders felt it was either impossible or very unlikely that Class 4 funding could be replaced by funding directly from community members. The 2021 TDB Advisory report5 found that gambling in New Zealand delivered a net positive wellbeing impact of between $1.74 billion and $2.16 billion annually. Online gambling is growing rapidly. The 2020 Health and Lifestyle Survey found that 1 in 4 adults gambled online, with 19% doing so weekly. Online gambling is problematic because: • No funds are currently generated for local community grants. • Very little tax revenue is generated for the New Zealand Government. No funding is currently provided to problem gambling treatment services; i.e., no problem gambling levy is currently paid. • No local employment is created. • It is highly accessible (people can gamble from the privacy of their own bedroom, 24 hours a day, 365 days a year). • It has a high speed of play. • There are no bet size restrictions. • There are no venue staff to provide supervision, advice, and support. • It is easily abused by minors. • There is no guaranteed return to players. • Excessive gambling is encouraged by the frequent use of inducements to gamble, such as player rebates and bonuses. Please refer to the written submission for further details (TRIM 261016335152).
69	6879283	Councils play an important role in addressing the harm caused by Class 4 gambling by adopting gambling venue policies which regulate the number and location of Class 4 pokies. According to research conducted by the Auckland University of Technology's New Zealand Work Research Institute, sinking lid policies are among the most effective policies for reducing pokie spending and problem gambling expenditure by 13%. Moreover,

		territorial local authorities (TLAs) who adopted restrictions above and beyond those mandated by the Gambling Act 2003 experienced less gambling harm than those TLAs who did not.7 Currently, just over half (55%), or 36 councils in Aotearoa New Zealand, have adopted a sinking lid policy. Please refer to the written submission for further details (TRIM 261013321854).
70	6881278	We support the: • inclusion of an additional criterion restricting the relocation of venues and EGMs within areas of high socio-economic deprivation at a minimum, •reinforcement of strict exclusion zones around high-deprivation areas, schools, churches, social service providers (including violence prevention and mental health and addiction support services), •use of harm mapping and socio-economic data to guide location decisions and prevent new venues from being established in areas already at higher risk of experiencing gambling harm, •prohibition of venue clustering within a specified radius (e.g., 1–2 km) to avoid the oversaturation of gambling venues in any one community. Please refer to the written submission for further details (TRIM 260914278551).

Table 9: Comments received in response to Question 7 that are outside the scope of the question/the draft policy

Respondent No	Response ID	Submission comment/s	Officer analysis
17	6864437	Lotto - this is a serious problem. Access should be reduced.	Class 4 gambling venue policy covers only class 4 gambling. Lotto is outside of the scope of the policy.
20	6864466	While possibly not do-able under the legislation, EGM proprietors should be required to distribute at least half of their net proceeds to community organisations in the local area.	The distribution of Class 4 gambling proceeds must be carried out in accordance with the Gambling Act 2003 and the Gambling (Class 4 Net Proceeds) Regulations 2004. The Council does not have responsibility for making decisions on this matter.
28	6864632	The provision of support to problem gamblers and their families. Is it available and easily accessible locally?	The provision of support services for people affected by gambling harm and their families is not a Council responsibility. A number of organisations within the Canterbury region provide these services. While most are based in Christchurch, they are accessible to people living in Waimakariri. Appendix 2 contains a list of these services. Following the hearings, officers will provide this information to the submitter in writing.
41	6865243	Gambling should not be the prime activity of a venue.	This requirement is set out in the Gambling Act 2003 and is reflected in the draft policy.

55	6868540	Lotto outlets should be under the same rules	Class 4 gambling venue policy covers only class 4 gambling. Lotto is outside of the scope of the policy.
63	6874520	Please advise why there is a restriction of only 1 external sign on a site when the venue may encompass 2 large outside walls, i.e. the venue is situated on a corner.	This inquiry relates to clause 5.4.4. of the draft policy. It limits gambling-related signage to one sign per site, regardless of the number of street frontages. The restriction is intended to limit the prominence and advertising effect of gambling signage and is consistent with the policy's harm-minimisation objectives. The prohibition on externally visible prize or jackpot advertising is also consistent with the Gambling (Harm Prevention and Minimisation) Regulations 2004. Officers will provide a written clarification in response to this inquiry.
64	6877818	We encourage Council to recognise that not all Class 4 venues operate under the same ownership and governance model. Member-based clubs operate on a fundamentally different basis to commercial hospitality venues. Clubs are governed by elected committees, exist for community benefit, and reinvest surpluses into facilities, services and activities that support their members and the wider community. For this reason, Clubs New Zealand encourages Council, to consider including definitions or explanatory provisions that recognise the unique nature of club-licensed premises. This would provide greater clarity should matters such as venue relocations, amalgamations or club mergers arise in the future. Please refer to the written submission for further details (TRIM 261012309767)	There are two types of corporate societies that operate Class 4 gambling: • Non-club societies, which operate gaming machines in separately owned pubs and bars. • Club societies, which operate gaming machines in their own club premises. The policy applies to all Class 4 gambling venues equally, regardless of whether they are operated by a club society or a non-club society. As a result, the inclusion of a specific definition or explanatory provision recognising club-licensed premises is not considered necessary, as it would not alter the application or interpretation of the policy.
67	6879246	Detailed submission submitted via email (TRIM 261016335145) Key points relevant to the question: The Association has sought independent legal advice from Brookfields Lawyers regarding gambling venue policy conflicts. In summary, the key advice is: • Being a member of a club or organisation that receives funding from a gaming grant will not usually give rise to conflict of interest when it comes to deciding or discussing Council's gambling venue policy, unless that member holds a paid role (e.g., a coach who is paid for that service); and • Where an elected member, outside of a debate on the issue, has expressed a view on the gambling venue policy that suggests that they do not and cannot have an open mind on the matter, this could give rise to a conflict of interest on the grounds of predetermination.	Officers note the submitter's comments regarding conflicts of interest and predetermination. These matters relate to elected members' decision-making responsibilities and governance processes rather than the content of the draft policy.

9. Analysis of Responses on Continuing to Allow New Standalone TAB Venues within the District

Question 8 - Do you think the Council should continue allowing new standalone TAB venues within the district, subject to the location restrictions specified in the draft TAB Venue policy 2026?

Question 9 - Is there anything else Council should consider when making decisions about the Draft TAB Venue Policy?

Relevant policy section: 5.1. New TAB Venue Establishment Provisions

Officer analysis and recommendations

Out of 70 submitters, 65 answered this question. Sixteen submitters (25%) supported continuing to allow new standalone TAB venues within the district, while a majority (41 submitters, 63.1%) opposed it. A small number of submitters (8, 12.3%) indicated that they had no view on this matter.

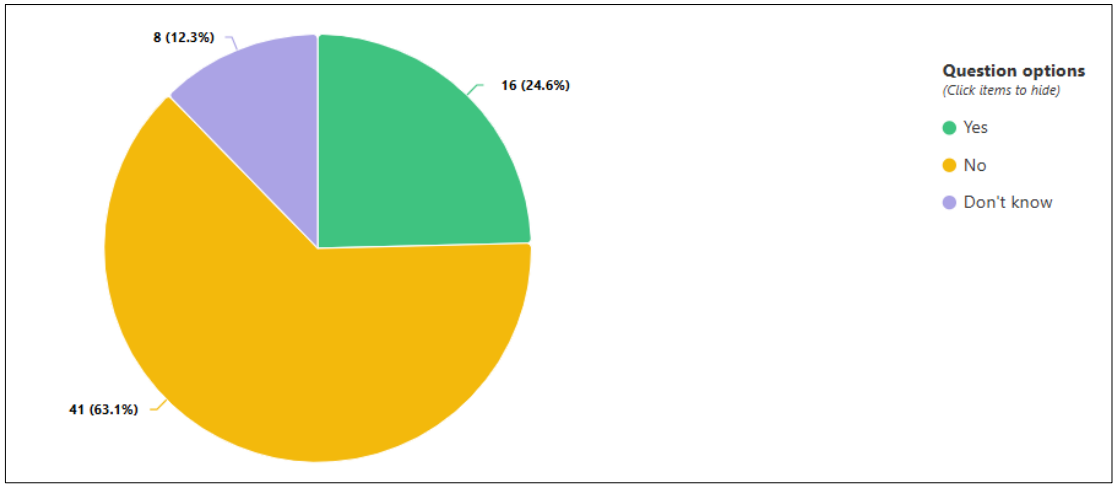


Figure 4: Submitter responses to continuing to allow new standalone TAB venues within the district (n=65)

Question 10 provided submitters with an opportunity to raise matters they considered relevant to Council's decision-making on the Draft TAB Venue Policy. A total of 22 relevant comments were received (Table 10), along with three comments that were outside the scope of the draft Policy (Table 11).

The matters raised were grouped into four themes, as follows:

1. Harm minimisation and community impacts (9, 41%). Under this theme, submitters raised concerns about gambling harm, impacts on vulnerable people, animal welfare within the racing industry, and the need for additional harm-minimisation measures when assessing future TAB venue applications. Submitters also highlighted the importance of considering venue density, socio-economic deprivation, Māori impacts, cultural proximity, and local evidence when assessing TAB venue applications.
2. Opposition to new TAB venues and support for further restrictions (7, 32%).
3. Economic and social benefits of TAB betting and the racing industry, including contributions to employment and the local and regional economy (5, 23%).
4. Growth of online betting and the reduced need for standalone TAB venues (5, 23%).

Recommendation/s - At present, there are no standalone TAB venues operated by TAB NZ in the Waimakariri District. No applications for standalone TAB venues have been received by Council since the TAB Venue Policy was first adopted.

Based on the current review, there is no evidence to support more restrictive provisions relating to standalone TAB venues within the district. **Accordingly, no amendments to the draft Policy are recommended.**

Table 10: Matters Suggested by Submitters for Council Consideration When Making Decisions on the Draft TAB Venue Policy

Respondent No	Response ID	Submission comment/s
1	6854504	No comment
2	6859744	Same as previously stated, a sinking lid is my preference, no new venues/locations or numbers of options.
3	6860039	No comment
4	6862471	Not that comes to mind.
5	6862631	No comment
6	6864379	No comment
7	6864385	No comment
8	6864394	The most obvious harm is to addicted humans, but where TAB gets involved, there is also the vast animal cruelty of the racing industry. Greyhound racing was just banned for this reason, and horse racing is no less brutal. Eventually, people will look back on it the same way we do slavery and say - "why did they allow this to happen?" Why not get ahead of history and disallow them now?
9	6864399	TAB can be done online, no need for a venue
10	6864407	No comment
11	6864408	No comment
12	6864411	No comment
13	6864412	No comment
14	6864427	No comment
15	6864431	TAB is a business, so it is required to grow to increase its base. It again preys on the weakest in society.
16	6864435	There are no positives in relation to gambling. We should be restricting it, not increasing it.
17	6864437	keep outlets to a minimum
18	6864457	No comment
19	6864461	I see both sides here. Charities are dependent on gambling but that should change just as alcohol advertising has in sport.
20	6864466	No comment

21	6864482	No comment
23	6864534	No comment
24	6864535	I support retaining the existing TAB Venue Policy, including the ability for standalone TAB venues to operate within the district. I believe the current policy appropriately balances individual choice, regulatory oversight and harm minimisation, and does not require further restrictions at this time
25	6864550	Reduce Tab number. Reduce number liquor stores. Reduce number vape shops
27	6864583	Don't know
28	6864632	No comment
29	6864707	no
30	6864723	Because they can do it online no need for more outlets
31	6864742	No need for bricks and mortar gambling venues as freely available online
32	6864753	No comment
33	6864782	No comment
34	6864881	No comment
35	6864892	No comment
36	6864967	No comment
37	6864984	We do not need a TAB in the community. Please protect our community.
39	6864995	No comment
40	6865009	Gambling is not good for a healthy community.
41	6865243	No comment
42	6865279	No comment
43	6865350	No comment
44	6865371	n/a
45	6865522	No comment
46	6866141	I do not believe there should be any.
47	6866300	No comment
48	6866306	No comment
49	6866413	No comment
50	6866457	It's much more social than any pokie It's better odds for the gambler, so less wasted money It also helps a huge industry of local workers
51	6866537	Gambling must be expelled in our region.
52	6866613	No comment
53	6867318	I oppose allowing any new standalone TAB venues in the Waimakariri District and strongly recommend that Council adopt a cap of zero standalone TAB venues. Commercial sports betting has shifted predominantly online; allowing new physical betting storefronts in local town centres unnecessarily normalises gambling for young people and creates everyday triggers for those experiencing gambling harm. As demonstrated in restricted jurisdictions like Perth, keeping dedicated gambling storefronts out of local suburban shopping areas protects community health and safeguards household financial well-being.
54	6867671	No comment
55	6868540	Racing is a large contributor to the local economy and a large employer.
56	6869163	No comment
57	6869251	Council should reduce all gambling venues.
58	6869274	Now that betting is online standalone TABs are not really a growing area of business.
59	6870120	There's enough of these kiosks in the pubs in the Waimakariri already.

60	6870677	No comment
61	6872281	No comment
62	6873934	No comment
63	6874520	No comment
64	6877818	No comment
65	6878848	No comment
66	6879209	No comment
67	6879246	No comment
68	6879249	No comment
69	6879283	Please refer to the Prevention Minimisation of Gambling Harm Territorial Local Authority Policy Working Group Submission for further details.
70	6881278	Detailed submission submitted via email (TRIM 260914278551) We consider that WDC should include the same protections offered for the Class 4 Venue Policy to this policy. • Venue Density and Socio-Economic Deprivation advice, • Māori Impact & Cultural Proximity advice, and • Localised Evidence & Data gaps (should an application be consented).

Table 11: Out-of-Scope Comments Received - Matters Suggested by Submitters for Council Consideration When Making Decisions on the Draft TAB Venue Policy

Respondent No	Response ID	Submission comment/s	Officer analysis
22	6864491	Reduce them to two, plenty of empty spaces at the moment in Rangiora alone	Not relevant, as there are currently no standalone TAB venues in the Waimakariri District.
26	6864561	As above - Remove gambling establishments from places that supply liquor	Not relevant. Standalone TAB venues are premises owned or leased by TAB NZ where the principal business is betting services. TAB facilities located within bars, hotels, and clubs are separate from standalone TAB venues and are outside the scope of this policy.
38	6864985	I find it dumb that the NZ government has banned off shore gambling sites. Just give the TAB the monopoly like the supermarkets	This matter relates to national gambling legislation rather than the location of standalone TAB venues within the district and is therefore outside the scope of this policy.

Social Impact Assessment of Gambling in Waimakariri

A Report to Support the Statutory Review of the Gambling (Class 4) Venue Policy and Totalisator Agency Board Venue Policy

Waimakariri District Council

July 2026

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EXECUTIVE SUMMARY

This report presents the findings of a Social Impact Assessment undertaken as part of the Council's statutory review of the Class 4 Gambling Venue Policy and Totalisator Agency Board Venue Policy. Gambling can generate both positive and negative impacts on communities. Changes to a gambling policy may influence access and availability, with implications for economic outcomes, community wellbeing, and public health. It is therefore important that policy development takes a balanced approach, maximising benefits while minimising harm.

This Social Impact Assessment primarily focuses on Class 4 gambling within the Waimakariri district, as there are no standalone TAB venues. The Assessment examines a range of social impacts, including effects on people's way of life, health and wellbeing, community safety, and financial wellbeing; recognising that these impacts are complex and interrelated. The assessment draws primarily on secondary data from national and local sources, supplemented by targeted stakeholder consultation. Key limitations include gaps in local data, limited stakeholder input, and challenges in isolating the impacts of Class 4 gambling from other forms of gambling.

At present, there are 11 Class 4 gambling venues and 163 electronic gaming machines in Waimakariri. The district ranks second in the Canterbury region for the number of electronic gaming machines. Since the last review of the Council's Class 4 Gambling Venue Policy in 2022, the number of venues has remained stable and the number of gaming machines has declined slightly, suggesting that gambling opportunities within the district have not increased overall.

Gambling provides benefits to the district, including entertainment opportunities, employment, and funding for community initiatives through grants. The assessment indicates that reliance on these grants varies, with some organisations depending heavily on this funding while others have limited reliance.

Despite these benefits, the district experiences significant financial losses from Class 4 gambling, amounting to millions of dollars annually, with losses continuing to rise. As there is no requirement for gambling proceeds to be redistributed locally, less than 20% of gambling expenditure is returned to the district through grants. For example, in 2024, the district lost approximately $10.3 million through Class 4 gambling, while only around $1.7 million was returned through grants. This indicates that the financial benefits received by the district are substantially lower than the amount lost through gambling expenditure.

Available evidence suggests that levels of identified problem gambling in Waimakariri are low, with fewer than 10 individuals accessing support services. However, this may understate the true extent of gambling harm, as harm can affect not only individuals who gamble but also their families and the wider community through social, emotional, and financial impacts. The full scale of harm remains difficult to determine due to data limitations and underreporting.

Against this backdrop, the Council's approach to regulating Class 4 gambling seeks to balance harm minimisation with economic flexibility. Given the district's low levels of identified problem gambling and the absence of significant growth in gambling venues or electronic gaming machines, a proportionate regulatory approach is considered appropriate. This enables potential risks to be managed while avoiding unnecessary regulatory constraints.

GLOSSARY OF TERMS

This section defines key terms used in this report.

Authorised Purpose for Class 4 gambling:

(i) a charitable purpose:

(ii) a non-commercial purpose that is beneficial to the whole or a section of the community:

(iii) promoting, controlling, and conducting race meetings under the Racing Industry Act 2020, including the payment of stakes:

Casino:

A gambling operation—

(i) for which there are game rules; and

(ii) that satisfies those game rules; and

(iii) which is conducted in accordance with those game rules; and

(iv) to which both a casino venue licence and a casino operator's licence apply;

but does not include gambling conducted by TAB NZ as referred to in section 120 of the Gambling Act 2003.

Community sensitive sites:

Locations where people regularly gather for specific purposes, and where exposure to gambling should be minimised to prevent related harm.

Class 4 Gambling:
Gambling that satisfies the following criteria:

a) the net proceeds from the gambling are applied to, or distributed for, authorised purposes; and
b) either—
    (i) no commission is paid to or received by a person for conducting the gambling; or
    (ii) the only commission that is paid to or received by a person for conducting the gambling is a commission payment to a venue operator that complies with regulations made under section 371(1)(dd); and
c) there are game rules for the gambling; and
d) the gambling, and the conduct of the gambling, satisfies relevant game rules; and
e) either—

    (i) the Secretary has categorised the gambling as class 4 gambling and not as another class of gambling; or
    (ii) the gambling utilises or involves a gaming machine.

Club:

A voluntary association of persons combined for a purpose other than personal gain.

Corporate societies:

Legally registered entities that operate as non-profit organisations.

Gambling Expenditure:

The gross amount wagered by gamblers, less the amount paid out or credited as prizes or dividends. In other words, it is the amount lost or spent by players, as well as the gross profit of the gambling operator.

Gambling harm:

(a) harm or distress of any kind arising from, or caused or exacerbated by, a person's gambling; and

(b) includes personal, social, or economic harm suffered—

(i) by the person; or

(ii) by the person's spouse, civil union partner, de facto partner, family, whanau, or wider community; or

(iii) in the workplace; or

(iv) by society at large.

Gaming Machine Profit:

The turnover of class 4 gambling minus the total prizes paid.

Net proceeds:

The amount remaining from gaming machine proceeds, after various costs, levies and taxes have been deducted.

Problem gambling:

Gambling behavior that is damaging to a person or their family, often disrupting their daily life and career.

Problem gambler:

A person whose gambling causes harm or may cause harm.

TAB New Zealand or **TAB NZ:**

The body established by section 54 to conduct racing betting, sports betting, or other racing or sports betting under the Racing Industry Act 2020.

TAB venue:

Premises owned or leased by TAB NZ and where the main business carried on at the premises is providing racing betting, sports betting, or other racing or sports betting services under the Racing Industry Act 2020.

Turnover:

The aggregate stakes in a gambling activity.

1: INTRODUCTION

1.1. Statutory Review of Class 4 Gambling Venue Policy

The primary legislation governing Class 4 gambling in New Zealand (NZ) is the Gambling Act 2003 (Gambling Act), which sets out the legal framework for licensing, compliance, harm minimisation, and enforcement. Under the Act, responsibility for licensing and administering Class 4 gambling rests with the DIA.

The Gambling Act provides territorial authorities (TAs) with the authority to regulate Class 4 gambling (non-casino electronic gaming machines) within their jurisdictions and to manage the impacts that gambling has on their communities. Accordingly, TAs have a statutory obligation to adopt, review and maintain a Class 4 Gambling Venue Policy. As explained in Section 2.2 of this report, this policy guides TAs in considering applications for consent to establish new Class 4 gambling venues, relocate existing venues, or increase the number of gaming machines at existing venues within their districts.

The Gambling Act provides clear guidance on the matters that must or may be included in a Class 4 Gambling Venue Policy. Further information on these statutory requirements is provided in Appendix 1(a).

Waimakariri District Council (Council) adopted its first Class 4 Gambling Venue Policy in April 2004. Since then, the policy has been reviewed six times, including the most recent statutory review completed in 2022. The current policy was due for its next review in October 2025. A summary of the current Class 4 Gambling Venue Policy is provided in Appendix 1(b).

Section 102 of the Gambling Act states the Class 4 Gambling Venue Policy must be reviewed within three years of its previous review. The policy continues to have effect while it is due for review or is undergoing review.

Class 4 gambling has the potential to deliver community benefits while also causing gambling-related harm. Any significant change to a gambling policy can influence access to and the availability of Class 4 gambling. This contributes to social change in the economy, community wellbeing, and public health. The policy review process must take a balanced approach that considers both the positive and negative aspects of Class 4 gambling. Section 101(2) of the Gambling Act requires TAs to consider the social impacts of gambling when adopting their policies. This enables TAs to identify the best policy options for the communities they serve, to maximise the benefits of gambling while avoiding or minimising adverse impacts.

Overall, a social impact assessment provides decision makers and those affected by gambling with robust information prior to any significant policy changes being considered. This report fulfils the requirement to assess the social impacts of gambling in Waimakariri, and its findings will inform the statutory review of the Council's Class 4 Gambling Venue Policy and TAB Venue Policy.

The objectives of this social impact assessment (the assessment) are to:

- Identify trends in gambling, including emerging vulnerabilities and areas of concern in Waimakariri.
- Assess both the benefits (for example, community funding) and harms associated with gambling in Waimakariri and
- Support evidence-based decisions regarding machine numbers, venue density, and relocation provisions that reflect community needs.

1.2. Statutory Review of Totalisator Agency Board Venue Policy

Section 96 of the Racing Industry Act 2020 requires TAs to adopt a Totalisator Agency Board (TAB) Venue Policy that specifies whether new TAB venues may be established in the district and where any TAB venues may be located. This policy applies only to standalone TAB venues owned or leased by TAB NZ, where the primary business conducted at the premises is providing racing betting, sports betting, or other racing or sports betting services under the Act.

The Council first adopted its TAB Venue Policy (previously referred to as the Board Venue Policy) in 2004 through a special consultative procedure. The most recent review of the policy was undertaken in 2022. As required by section 97 of the Racing Industry Act 2020, the policy must be reviewed within three years of the previous review, and it continues to have effect while it is under review.

At present, there are no standalone TAB venues owned by TAB NZ in the Waimakariri District. No applications for TAB venues have been received by the Council since the TAB Venue Policy was first adopted.

When adopting a TAB Venue Policy, TAs are required under section 96 of the Racing Industry Act 2020 to have regard to the social impacts of TAB betting. However, as there are currently no standalone TAB venues in the district, there is limited basis for assessing these impacts. Consequently, the remainder of this report focuses primarily on the social impacts of Class 4 gambling.

1.3. Scope of Social Impact Assessment

Geographical scope – This covers Class 4 gambling activities and their impacts within the Waimakariri District. Where relevant, references to neighbouring districts are provided for comparative or contextual purposes.

Type of gambling considered under the assessment – The assessment focuses on Class 4 gambling (non-casino electronic gaming machines). Please refer to Section 2.1 of this report for more information.

Information and data related to other types of gambling (e.g., online gambling, casino gambling) are presented in this report to provide a better understanding of the overall gambling environment within which Class 4 gambling operates, and for comparative purposes.

Social impacts assessed – The social impacts of Class 4 gambling may include both positive and negative changes to one or more of the following[1]:

- People's way of life – how they live, work, study, play and interact with one another on a day-to-day basis
- Culture – people's beliefs, customs, values
- Health and wellbeing – physical and mental health and overall wellbeing
- Community safety – criminal activities associated with gambling and perceptions of safety within the community
- Financial and property impacts – whether communities and individuals are economically affected, including changes in financial stress and property rights.

In general, it is not practical to prepare a comprehensive list of all the social impacts related to Class 4 gambling, as the impacts are interrelated and complex. However, the above list represents the key impacts covered in this assessment.

[1] Adopted from Vanclay, F. (2003). *International principles for social impact assessment. Impact Assessment and Project Appraisal*, 21(1), 5-12.)

Information and data sources – A social impact assessment of Class 4 gambling requires a wide range of data and information. This assessment primarily relies on secondary data (data that has already been collected by external organisations for some other purposes). Where data gaps were identified, primary data was collected through mini surveys with targeted stakeholders.

A significant amount of data related to Class 4 gambling was obtained from the Department of Internal Affairs (DIA). In addition, secondary data from Statistics New Zealand (Stats NZ), the Ministry of Health, the National Public Health Service and the Problem Gambling Foundation were used to compile the social baseline of the assessment. Where local-level data and evidence were limited, findings from previous academic research undertaken in NZ and other developed countries were used to inform the assessment of gambling harm.

Targeted stakeholder consultation was undertaken in three phases. The first phase involved consultation with stakeholders primarily working in gambling harm minimisation. The second and third phases involved consultation with all the corporate societies, the NZ Gaming Association, and a randomly selected group of gambling grant recipients in Waimakariri. Appendix 2 presents the list of stakeholders consulted as part of this assessment.

Limitations of the assessment – This assessment was subject to several limitations outside the control of Council staff who undertook it. These limitations directly or indirectly affect the understanding of Class 4 gambling activities in Waimakariri and their associated social impacts. The key limitations include:

- Lack of local level data on people who participate in Class 4 gambling
- Limited availability of local-level data on gambling harm, requiring reliance on regional, national, and international evidence to inform the assessment
- Limited stakeholder responses
- Potential stakeholder bias in submissions
- Assessment of certain social impacts based on secondary data and previous academic research rather than first-hand evidence
- Lack evidence to understand impact of Class 4 gambling on the broader district economy
- Difficulty in isolating the impacts of Class 4 gambling from other forms of gambling (e.g., online gambling)

Given the assessment's reliance on secondary data, the data quality and reliability are beyond the control of Council staff.

2: CLASS 4 GAMBLING: KEY FACTS AND THE ROLE OF TERRITORIAL AUTHORITIES

2.1. Class 4 Gambling

Section 20 of the Gambling Act classifies gambling into six legal classes:

I. Class 1 gambling
II. Class 2 gambling
III. Class 3 gambling
IV. Class 4 gambling
V. Casino gambling
VI. Gambling conducted by the Lotteries Commission

Racing and betting activities are considered a separate segment of gambling and are regulated under the Racing Industry Act 2020.

Class 1, 2, and 3 gambling activities do not use electronic gaming machines (EGMs), either directly or indirectly. Class 1 gambling is characterised as low-stake and low-turnover and therefore carries a relatively low level of risk. As the classification level increases, the amount of money spent, and the associated risk also increase. Class 4 gambling is described as high-turnover, high-risk gambling.

Section 31 of the Gambling Act states that Class 4 gambling can only be conducted by corporate societies that hold:

- a Class 4 operator's licence for the gambling; and
- a Class 4 venue licence for the place where the gambling is conducted.

There are two types of corporate societies that operate Class 4 gambling:

- Non-club societies – operate machines in separately owned pubs and bars.
- Club societies – operate gaming machines in their own clubrooms.

Although clubs are corporate societies under the Gambling Act, different rules apply to club societies compared with non-club societies. This report does not provide a complete description of the differences between the rules that apply to club and non-club societies but includes relevant information where necessary. Readers seeking more detailed information on Class 4 gambling in clubs may refer to the *Class 4 Gambling in Clubs* booklet published by DIA.[2]

The Totalisator Agency Board New Zealand (TAB NZ) and societies that are racing clubs may obtain licences from DIA to operate Class 4 gambling in their own venues. Although TAB NZ is a statutory body established under the Racing Industry Act 2020, section 33 of the Gambling Act 2003 requires that it be treated as a corporate society for the purposes of Class 4 operator and venue licensing, without altering its underlying legal status.

2.1.1. Class 4 Gambling Venues and Electronic Gaming Machines

Class 4 gambling venues are places where Class 4 gambling is operated. The number of EGMs permitted in each venue depends on when the venue was first licensed. [3] The permitted number of EGMs for and the conditions that apply are shown in Table 1.

Table 1: Maximum number of electronic gaming machines permitted per venue

When it was first licensed	Number of machines	Additional conditions or requirements	Section of Gambling Act
Venues licenced as at 17 October 2001	Maximum of 18 machines	Unless the venue has been without a licence for six months or more. (If a venue has been without a licence for six months or more, it losses its right to operate more than nine machines.)	Section 92

[2] DIA. (2025). *Gambling in Pubs and Clubs (Class 4)*. Available at: https://www.dia.govt.nz/Services-Casino-and-Non-Casino-Gaming-Gambling-in-Pubs-and-Clubs-(Class-4)
[3] DIA. (2021). *Drafting Policy – Gaming Machines Maximum Numbers*. Available at: https://www.dia.govt.nz/Gambling-territorial-authorities-policy-review-process-drafting-policy

Venues licenced after 17 October 2001	Maximum of 9 gaming machines	Unless: - a new venue licence is obtained that allows an increase in the number of machines, or - the existing licence is amended to allow an increase in the number of machines	Section 93 and 94
Clubs licenced after 18 September 2003	Maximum of 9 gaming machines	Unless the council has given consent to, and the Minister has exercised discretion to approve, a greater number of gaming machines, by meeting the requirements of either: - Section 95 (where clubs seek to merge – up to maximum of 30 machines may be approved) or - Section 96 of the Gambling Act (up to a maximum of 18 machines may be approved)	Section 95 and 96

Source: DIA. (2021). *Drafting Policy – Gaming Machines Maximum Numbers*

2.1.2. Distribution of Class 4 Gambling Machine Proceeds for Authorised Purposes

The Gambling (Class 4 Net Proceeds) Regulations 2004 set out the legal requirements governing the distribution of gambling proceeds to the community.

Under the Gambling Act, the purpose of Class 4 gambling must be to raise funds for authorised purposes. Corporate societies are required to specify their authorised purposes when applying to DIA for a Class 4 gambling licence, or when renewing an existing licence. Although all Class 4 gambling operators are subject to the authorised-purpose provisions of the Gambling Act, the scope and application of authorised purposes can differ depending on the type of corporate society (club societies, non-club societies, and racing clubs).

For non-club societies, authorised purposes may be:

(i) a charitable purpose or
(ii) a non-commercial purpose that is beneficial to the whole or a section of the community.

Authorised purposes for club societies may include expenditure on club facilities and member services or providing funds for subsections of the club (such as sports teams). Some clubs may also choose to distribute gaming proceeds as grants to community organisations, although this is not required under the Gambling Act.

The Gambling (Class 4 Net Proceeds) Regulations 2004, specify that corporate societies must distribute a minimum of 40% of their gross proceeds to authorised purposes (Figure 1). There is no law or regulation requiring that grants be made within the same community in which the funds were raised.

The second-largest portion of gambling proceeds is paid to the Government as gambling duty (23%). Corporate societies operating EGMs may retain 19.5% of the proceeds to cover administrative costs. The remaining 1.5% is allocated to the Ministry of Health to fund

gambling-related research and to provide treatment and support services for people affected by gambling harm. [4]

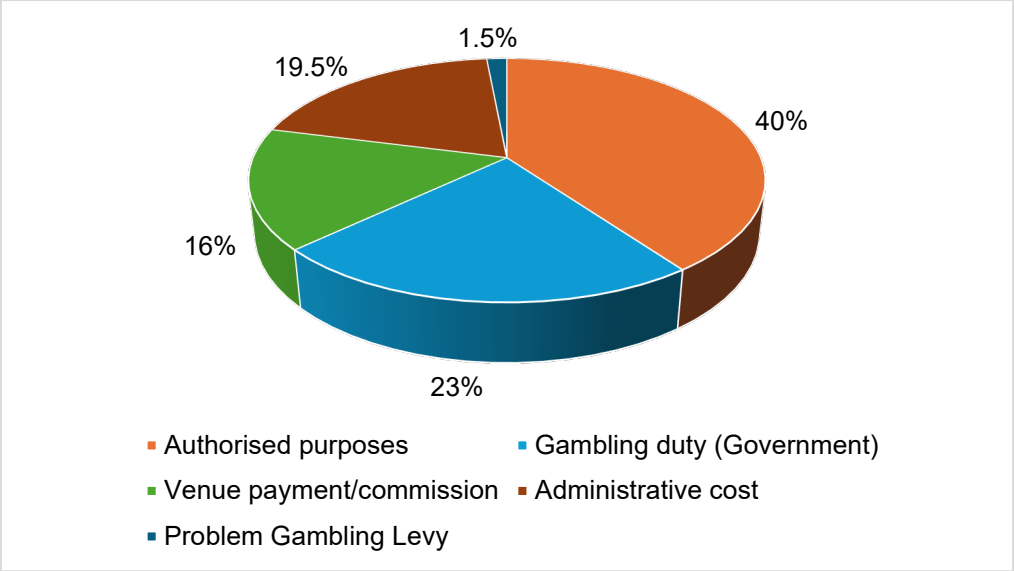


Figure 1: Allocation of Class 4 gambling gross proceeds (excluding GST)

Source: Problem Gambling Foundation. (no date). *Pokies/Class 4 Gambling [Fact Sheet]*

2.2. Role of territorial authorities in regulating Class 4 gambling

Territorial authorities have a limited role in regulating Class 4 gambling within their districts. Through their Class 4 Gambling Venue Policy, TAs can limit the number and location of Class 4 venues and may also set limits on the number of EGMs permitted in their district.

Before applying for a Class 4 venue licence, a corporate society must obtain consent from the relevant TA. The following sections outline the circumstances in which a corporate society must obtain TA consent.

A corporate society is required to obtain TA consent if it:

- proposes to increase the number of machines that may be operated at a Class 4 venue, either by applying for or amending a Class 4 venue licence.
- applies for ministerial discretion to permit an increase in the number of gaming machines at a club.
- establishes a new Class 4 venue at a location that did not hold a Class 4 venue licence on 17 October 2001.
- applies for a Class 4 venue licence and such a licence has not been held by any society for the venue within the last 6 months.
- relocates the venue to which a Class 4 venue licence currently applies. Such a proposal must be considered under the council's relocation policy and have the venue operator's agreement.

[4] Problem Gambling Foundation. (no date). *Pokies/Class 4 Gambling [Fact Sheet]*. Available at: https://www.pgf.nz/knowledge-hub/pokies-class-4-gambling

3: THE CLASS 4 GAMBLING ENVIRONMENT IN NEW ZEALAND

This section provides a detailed description of Class 4 gambling in NZ to better understand the broader gambling environment that Class 4 gambling in Waimakariri fits into.

3.1. Availability of Class 4 Gambling in New Zealand

Class 4 gambling is available and accessible throughout NZ, with venues and EGMs widely distributed across the country. As of December 2025, a total of 13,751 EGMs were operating in NZ across 957 venues[5]. The majority of Class 4 gambling venues (761) are concentrated in areas with medium to high socio-economic deprivation (deprivation deciles 5–10). Section 4.4 of this report provides a detailed description of socio-economic deprivation relevant to this impact assessment.

At the national level, the number of venues and EGMs shows a gradual reduction from 2020 to December 2025 (Table 2).

Table 2: Number of Class 4 gambling venues and EGMs in New Zealand from 2020 to 2025

Year	Number of venues	Number of EGMs
December 2020	1068	14,781
December 2021	1050	14,743
December 2022	1028	14,503
December 2023	1003	14,226
December 2024	977	13,985
December 2025	957	13,751

Source: DIA. (2026). *Class 4 Gambling Venue and Gaming Machine Numbers - Quarterly Lists.*

3.2. Participation in Class 4 Gambling

The 2023/24 NZ Gambling Survey[6] indicates that gambling is a common activity among New Zealanders. It is estimated that approximately 64% (around 2.7 million people) of adults aged 15 years and over participated in some form of gambling in the past 12 months. Lotto was the most popular form of gambling, with participation at around 55% of adults.

The survey also shows that a smaller proportion of adults (around 12%) participated in EGMs in pubs and clubs in the past year. Participation in EGMs is generally higher among males than females across most age groups.

The survey data indicates higher participation in EGMs at pubs and clubs among Māori and Pacific peoples compared with NZ European and other ethnic groups.

3.3. Expenditure on Class 4 Gambling

In NZ, the highest level of gambling expenditure has been associated with Class 4 gambling when compared with other regulated gambling via TAB NZ, NZ Lotteries products, and casinos (Figure 2). From 2019/20 to 2024/25, annual expenditure on Class 4 gambling consistently exceeded $800 million. [7]

[5] DIA. (2026). *Class 4 Gambling Venue and Gaming Machine Numbers - Quarterly Lists*. Available at: https://catalogue.data.govt.nz/dataset/class-4-gambling-venue-and-gaming-machine-numbers-quarterly-lists
[6] Health New Zealand. (2025). *New Zealand Gambling Survey 2023/24 (Kupe data explorer)*. Available at: https://kupe.healthpromotion.govt.nz/nzgs/
[7] DIA. (2025). Annual Gambling Expenditure Statistical Report. Available at: https://app.powerbi.com/view?r=eyJrIjoiNzBiOTUwNDQtZDNkNy00MDFkLWFmOWUtZThlNTljOGQ0NzJhIiwidCI6ImY2NTljYTVjLWZjNDctNGU5Ni1iMjRkLTE0Yzk1ZGYxM2FjYiJ9

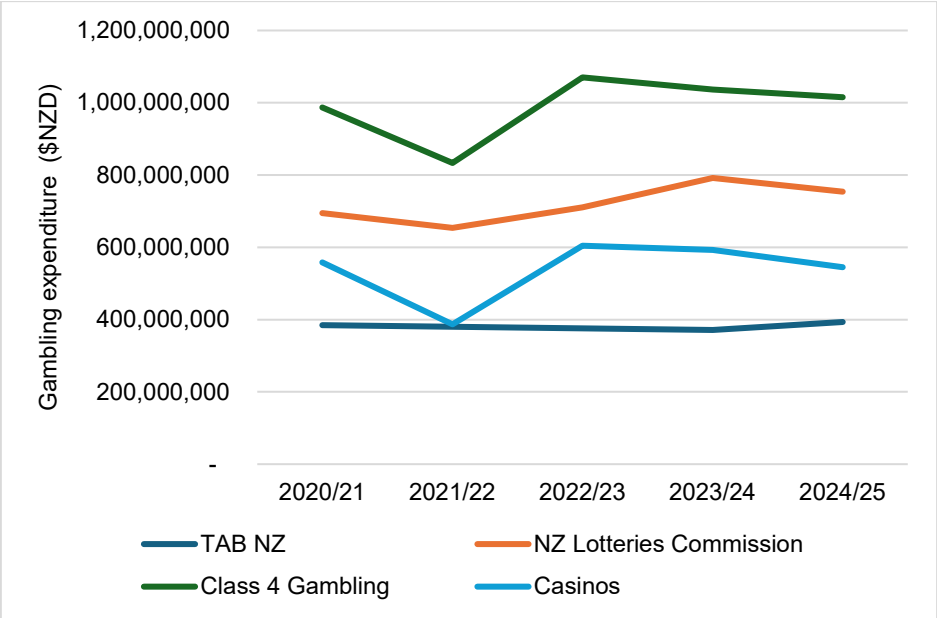


Figure 2: Annual gambling expenditure by gambling type in NZ (values are not adjusted for inflation)

Source: DIA. (2025). *Annual Gambling Expenditure Statistical Report*.

In 2024/25, expenditure on Class 4 gambling was approximately $1.02 billion, accounting for around 37% of total gambling expenditure (Table 3).[7] The estimated figure for 2024/25 was slightly lower than the previous year. After adjusting for inflation, per capita expenditure on Class 4 gambling was estimated as $180 for 2024/25. The reported per capita expenditure for other types of gambling was as follows: TAB $60, NZ Lotteries Commission $134, Casino $102.[7]

Table 3: Gambling expenditure by gambling type in year 2024/25

Gambling type	Expenditure in NZD (2024/25)
TAB NZ	393,386,981
NZ Lotteries Commission	754,261,000
Class 4 Gambling	1,015,358,561
Casinos	545,124,093
TOTAL	**2,792,274,423**

Source: DIA. (2025). *Annual Gambling Expenditure Statistical Report*.

3.4. Online gambling in New Zealand

With the advancement of technology, gambling behaviours have changed significantly, and online gambling is becoming increasingly popular. The PGF explains that “online gambling refers to internet gambling, internet TV gambling, and gambling on mobile devices.” Understanding the online gambling environment is important for the Class 4 gambling venue policy review, as Class 4 gambling and online gambling are interconnected, and changes in one area can significantly affect the other.

With fewer restrictions on online gambling and rapid advancements in technology, the online gambling market in NZ is on the rise. Although district-level data on online gambling is not available, it can be reasonably assumed that online gambling activities at the district level are also increasing.

Under the Gambling Act, the only entities legally permitted to offer online gambling services within NZ are TAB NZ and Lotto NZ. Online casinos based in NZ are considered illegal under this legislation. However, New Zealanders are allowed to participate in online gambling through

offshore websites, although these activities fall outside the scope of regulation provided by the current Gambling Act (DIA, 2025).

At the time this report was written, the DIA was working on introducing new legislation to regulate online gambling (online casinos). The DIA introduced a Bill to regulate online casino gambling on 30 June 2025, and the legislation is expected to be enacted in early 2026.

The NZ Gambling Survey 2023/24[6] shows:

- Over 1 million adults (31.1%) participated in some form of online gambling (including NZ-based and overseas platforms) in the last 12 months.
- Online gambling participation is higher among Māori followed by Pacific peoples, and lower among Asian populations.
- Participation is highest among moderate and high-risk gamblers, followed by low-risk gamblers.

Based on the available data and information on Class 4 gambling in Waimakariri, as well as the general understanding of online gambling, several policy implications have been identified:

a) The availability of both Class 4 gambling and online gambling opportunities contributes to overall growth in the gambling market within the district.
b) Due to the increasing Class 4 gambling expenditure over the past few years (2020–2024), it is possible that these two types of gambling have a complementary relationship. This means that growth in one type of gambling may automatically support growth in the other.
c) Reducing the accessibility and availability of Class 4 gambling could indirectly influence gamblers to participate in online gambling, and vice versa.

4: WAIMAKARIRI DISTRICT PROFILE

4.1. Waimakariri District

The Waimakariri district is located in the Canterbury Region, north of the Waimakariri River. The district shares boundaries with Christchurch City to the south, Selwyn District to the south and west, and Hurunui District to the north.

The Waimakariri district is geographically diverse, ranging from provincial townships such as Rangiora and Kaiapoi, through to the remote high country farming area of Lees Valley. Eighty percent of the district population is in the east of the district and approximately 60 percent of residents live in the four main urban areas of Rangiora, Kaiapoi, Woodend/Pegasus and Oxford. The remainder live in smaller settlements or the district's rural area, including approximately 6000 on rural- residential or rural 'lifestyle' blocks.

Geographically, socio-culturally and economically, the Waimakariri district is primarily a peri-urban area. Residents are drawn to and identify with the outdoor lifestyle and recreation opportunities available in our district. However, due to its proximity to Christchurch City, the district has a significant and growing urban and peri-urban population.

4.2. District Population

The total population of the Waimakariri District was estimated at 69,800 as at June 2025[8]. The district has a slightly higher number of females than males. The gender and age distribution of the population is presented in Table 4. The district is characterised by an ageing population, as the number of residents aged 65 years and over has surpassed the number of those aged under 15 over time (Figure 3).

Table 4: Age and gender distribution of the district population as at June 2025

Age (Years)	Male	Female
0-14	6,000	5,700
15-39	9,700	9,500
40-64	11,000	12,100
65 and Over	7,500	8,300
Total Population	**34,200**	**35,600**

Note: Due to rounding, individual figures may not always sum to the stated total(s).

Source: Stats NZ. (2025). Aotearoa Data Explorer: Subnational population estimates (TALB, SA3, SA2), by age and sex, at 30 June 1996-2025 (2025 boundaries)

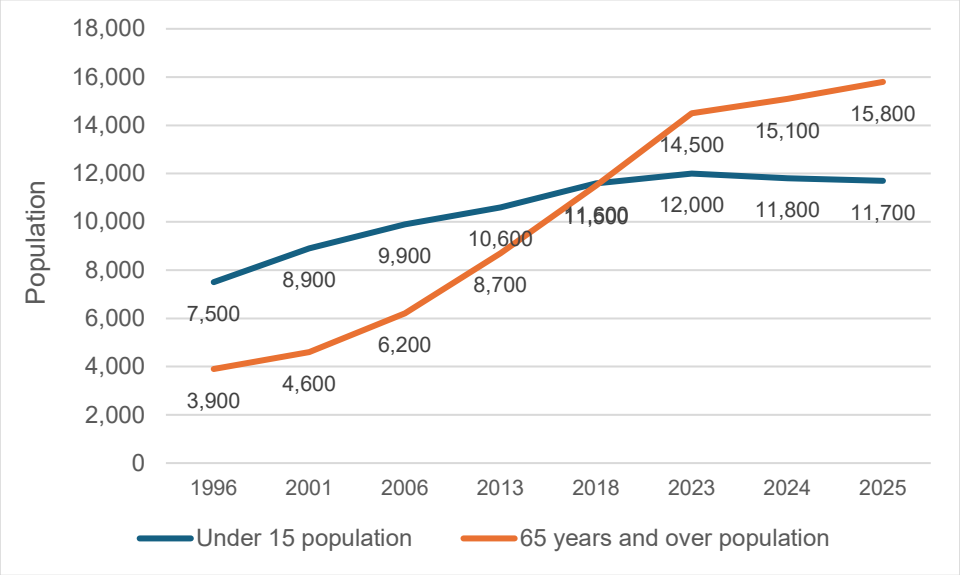


Figure 3: Changes in the proportion of the elderly population (aged 65 and over) and the young population (aged under 15) in Waimakariri from 1996 to 2025

Source: Stats NZ. (2025). Aotearoa Data Explorer: Subnational population estimates (TALB, SA3, SA2), by age and sex, at 30 June 1996-2025 (2025 boundaries)

The district has experienced noticeable population and economic growth in recent years. By June 2025 the Waimakariri population had grown by 1.1%, accounting for approximately 10% of total population growth in the Canterbury region.[9] High-growth population projections for the Waimakariri District indicate that the district is expected to reach approximately 98,900 residents by 2048.[10] This represents nearly 40% population growth between 2023 and 2048

[8] Stats NZ. (2025). *Aotearoa Data Explorer: Subnational population estimates (TALB, SA3, SA2), by age and sex, at 30 June 1996-2025 (2025 boundaries)*. Available at: https://explore.data.stats.govt.nz/
[9] Stats NZ. (2025). *Subnational population estimates: At 30 June 2025 - Canterbury population the fastest growing*. Available at: https://www.stats.govt.nz/information-releases/subnational-population-estimates-at-30-june-2025/
[10] Stats NZ. (2025). *Aotearoa Data Explorer: Statistical area 2 population projections, by age and sex, 2018(base)-2048 (update).* Available at: https://explore.data.stats.govt.nz/

(Figure 4). Based on current growth patterns, it is reasonable to assume that the district is likely to follow this projected trend.

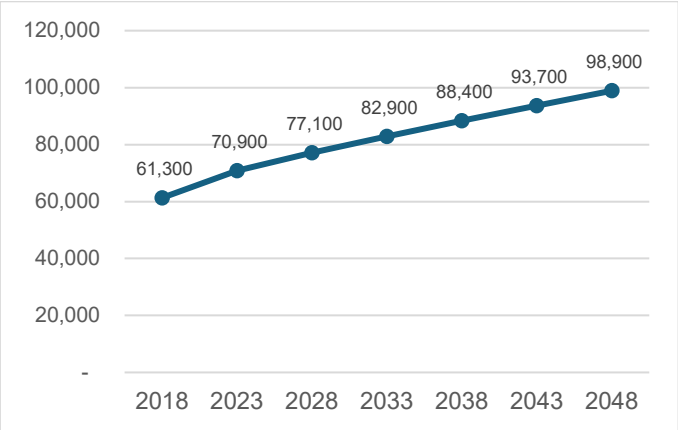


Figure 4: Waimakariri District high population projection from 2018 to 2048

Source: Stats NZ. (2025). Aotearoa Data Explorer: Statistical area 2 population projections, by age and sex, 2018(base)-2048 (update)

Geographically, the Waimakariri District is divided into three wards: Oxford–Ohoka, Rangiora–Ashley, and Kaiapoi–Woodend. The Rangiora–Ashley and Kaiapoi–Woodend wards are where the majority of the district's population resides (Table 5). [11] With regards to population distribution across key towns, Rangiora, Kaiapoi, Woodend, and Pegasus have the largest populations.

Table 5: Estimated Waimakariri District Population by Ward

Ward	**2025**
Oxford-Ohoka ward	13,550
Rangiora-Ashley ward	27,200
Kaiapoi-Woodend ward	29,000
TOTAL	**69,800**

Note: Due to rounding, individual figures may not always sum to the stated total(s).

Source: Stats NZ. (2025). Aotearoa Data Explorer: Subnational population estimates (TA, ward), by age and sex, at 30 June 2023-25 (2026 boundaries).

4.3. Ethnicity In Waimakariri

Waimakariri is not highly diverse in terms of residents' ethnicity when compared with national level Census 2023 data (Table 6). Europeans make up the majority of the district's population (92.1%), followed by Māori (9.9%).[12] Compared with the 2018 Census, there has been a slight increase in the number of people identifying as Māori, Pacific Peoples, Asian, and Middle Eastern/Latin American/African ethnicities, while the proportion of Europeans has slightly decreased. As the district's population continues to grow, it is reasonable to anticipate that ethnic diversity in Waimakariri will further increase in the future.

[11] Stats NZ. (2025). *Aotearoa Data Explorer: Subnational population estimates (TA, ward), by age and sex, at 30 June 2023-25 (2026 boundaries)*. Available at: https://explore.data.stats.govt.nz/
[12] Stats NZ. (2025). *Aotearoa Data Explorer: Ethnicity (detailed total responses level 4), age, and gender for the census usually resident population count, (RC, TALB, Health), 2018, and 2023 Censuses.* Available at: https://explore.data.stats.govt.nz/

Table 6: Waimakariri district population by ethnicities 2018 and 2023 census

Ethnicity	Waimakariri 2018 Census		Waimakariri 2023 Census		New Zealand 2023 Census	
	Number	%	Number	%	Number	%
European	55299	93%	61,008	92.1%	3,383,742	67.8%
Māori	5097	8.6%	6,546	9.9%	887,493	17.8%
Pacific Peoples	822	1.4%	1,065	1.7%	442,632	8.9%
Asian	1719	2.9%	2,547	3.9%	861,576	17.3%
Middle Eastern/Latin American/African	249	0.5%	438	0.7%	92,760	1.9%
Other ethnicity	816	1.4%	882	1.4%	56,133	1.2%
Total stated	59,502	-	66,246	-	4,993,923	-
Total	59,502	-	66,246	-	4,993,923	-

Note: Percentages may total more than 100% because individuals can identify with more than one ethnic group.

Source: Stats NZ. (2025). *Aotearoa Data Explorer: Ethnicity (detailed total responses level 4), age, and gender for the census usually resident population count, (RC, TALB, Health), 2018, and 2023 Censuses.*

4.4. Socio-economic Deprivation in Waimakariri

The NZ Deprivation Index (NZDep Index) is a tool developed by the University of Otago to measure relative socio-economic deprivation in small geographic areas across NZ. The most recent version, NZDep Index 2023, is based on data from the 2023 Census and reflects eight dimensions of material and social deprivation: lack of income, employment, communication, support for living, qualifications, home ownership, living space, and dry living conditions. The index categorises small areas in NZ into one of ten deciles, where Decile 1 represents areas that have the least socio-economically deprived scores and 10 represents the areas with the most socio-economically deprived scores. Small geographic areas that represent each decile (1 to 10) are scattered throughout the country.

In Waimakariri, a small percentage of the population (3.4%) live in areas categorised as most socio-economically deprived (Deciles 9 and 10)[13] (Figure 5). The percentage of the population increases when moving up to the least deprived areas, from Decile 8 to Decile 1 (1 being least deprived). The average decile of the district has been estimated as 3.9, which implies that the relative socio-economic status of the district population is relatively good. Figure 6 presents a map showing relative socio-economic deprivation across Waimakariri based on the NZDep 2023 Index. Areas with the highest deprivation levels are shown in red to dark red are primarily located near the Kaiapoi and Rangiora town centres.

[13] Infometrics. (2025). *Regional Economic Profile: Waimakariri District Socioeconomic Deprivation*. Available at: https://regions.infometrics.co.nz/waimakariri-district/census/indicator/socioeconomic-deprivation?census=waimakariri-district

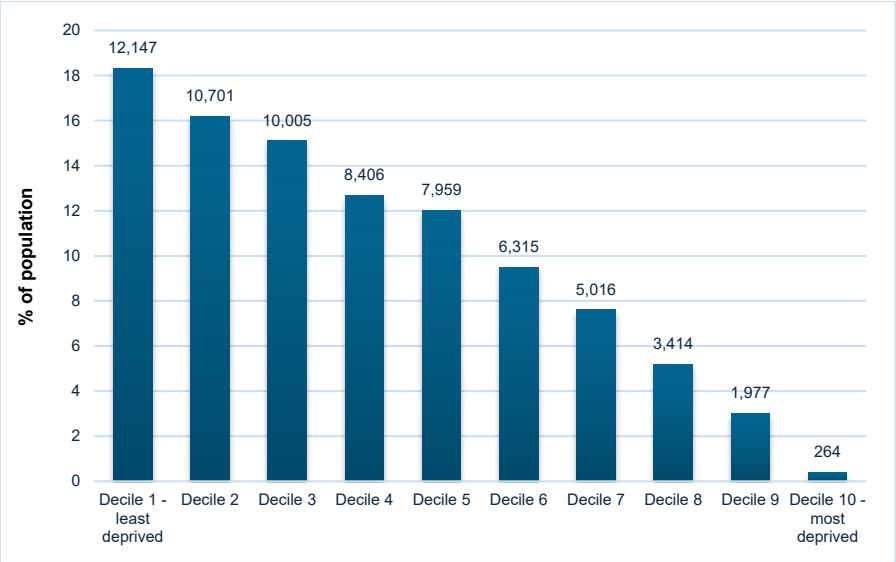


Figure 5: Percentage of population in each socio-economic decile in Waimakariri – 2023

Source: Infometrics. (2025). *Regional Economic Profile: Waimakariri District Socioeconomic Deprivation*.

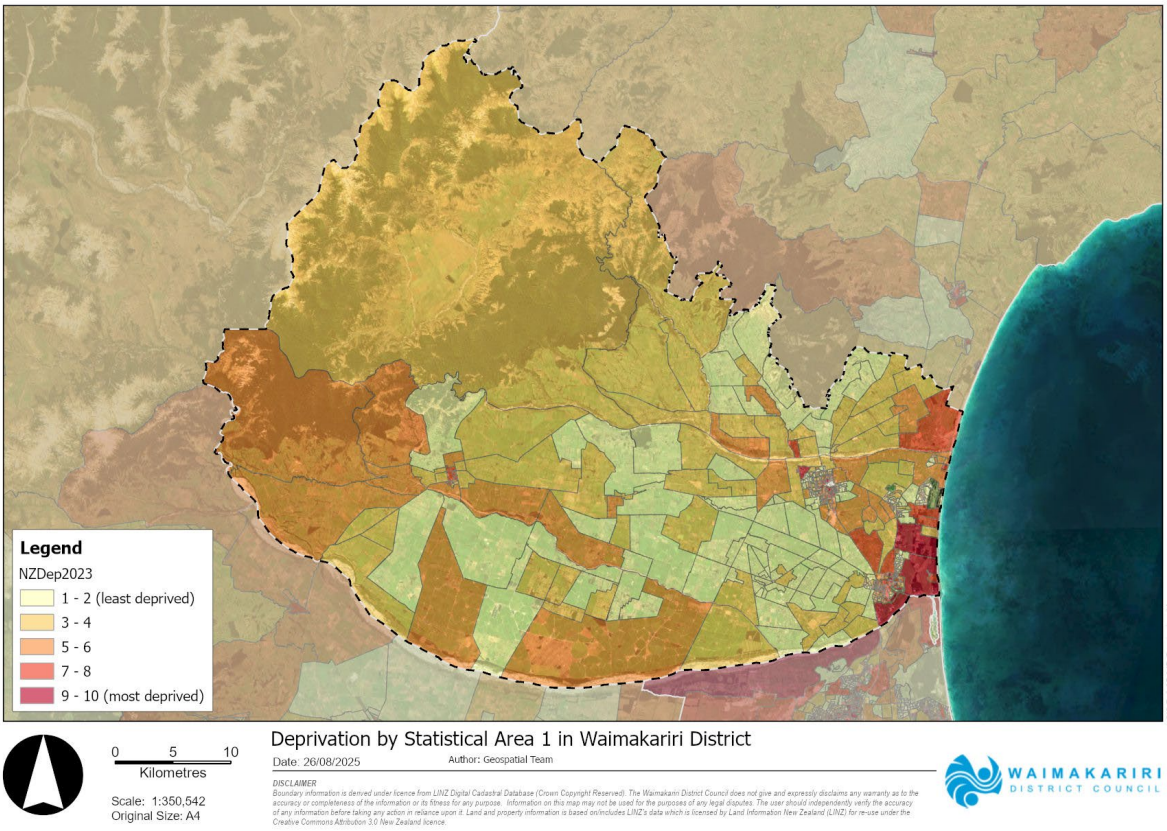


Figure 6: Map of socio-economic deprivation in Waimakariri based on NZDep 2023

4.5. Employment and Total Personal Income

According to the 2023 census on personal income for individuals aged 15 and over, the median personal income in Waimakariri is estimated at $40,200[14]. Approximately 12% of individuals earned $10,000 or less annually, while around 40% received $50,000 or more (Table 7). [15] About 49% of individuals derive their income from full-time employment, and 15% from part-time work (Figure 7).[16]

Table 7: Total personal income of individuals aged 15 and over

Total personal income	Number	Percentage
$10,000 or less	6627	12.2
$10,001 - $20,000	6138	11.3
$20,001 - $30,000	9180	16.8
$30,001 - $50,000	9777	17.9
$50,001 - $70,000	9246	17
$70,001 - $100,000	7677	14.1
$100,001 or more	5850	10.7
Total stated	54498	100

Source: Infometrics. (2025). *Regional Economic Profile: Waimakariri District Total Personal Income 2023*.

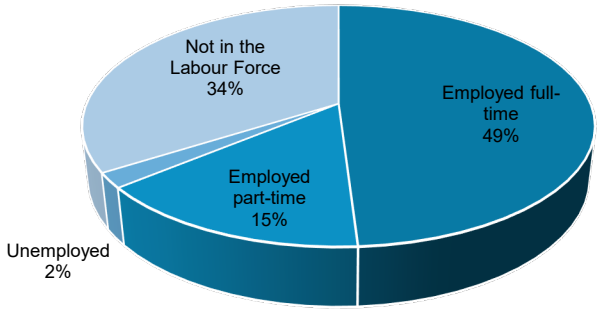


Figure 7: Labour force status in Waimakariri (2023 Census)

Source: Infometrics. (2025). *Regional Economic Profile: Waimakariri District Labour Force Status 2023*.

5: CLASS 4 GAMBLING IN WAIMAKARIRI

5.1. Gambling venues and electronic gaming machines in Waimakariri

According to DIA, there were 11 gambling venues and 163 gaming machines in Waimakariri as at December 2025. Based on 2025 data, Waimakariri ranked second in the Canterbury region for the number of EGMs (Table 8).

[14] Stats NZ (2023). *Aotearoa Data Explorer: Disability indicator, individual home ownership, total personal income, ethnicity, and age for the census usually resident population count aged 15 years and over, (RC, TALB, Health), 2018 and 2023 Censuses.* Available at: https://explore.data.stats.govt.nz/
[15] Infometrics. (2025). *Regional Economic Profile: Waimakariri District Total Personal Income 2023*. Available at: https://regions.infometrics.co.nz/waimakariri-district/census/drill-down/total-personal-income/10001-20000
[16] Infometrics. (2025). *Regional Economic Profile: Waimakariri District Labour Force Status 2023*. Available at: https://regions.infometrics.co.nz/waimakariri-district/census/indicator/labour-force-status

Table 8: Gaming Machine and Venue data by District in Canterbury as at December 2025

District	No of venues as at December 2025	No of gaming machines as at December 2025
Christchurch	75	1228
Waimakariri	**11**	**163**
Timaru	12	156
Ashburton	12	136
Selwyn	13	123
Waitaki	11	107
Hurunui	8	58
Mackenzie	4	36
Waimate	2	17
Kaikōura	1	15

Source: DIA. (2026). *Class 4 Gambling Venue and Gaming Machine Numbers - Quarterly Lists.*

Of the 11 gambling venues in the district, the majority are located in Kaiapoi (5) and Rangiora (4), with one venue in Oxford and one in Woodend.

Table 9 provides a summary of the gambling venues in Waimakariri, including their locations, primary activities, club types, and the number of gaming machines operated at each venue.

Table 9: Summary of Class 4 Gambling Venues in Waimakariri

Society name	Venue name	Club type	Primary activity	Count of Gaming Machines	Location
The Lion Foundation 2008	Craft Bar and Kitchen Kaiapoi	Non-club	Restaurant/tavern	9	Kaiapoi
Kaiapoi Workingmens Club & M S A Inc	Kaiapoi WMC and MSA	Club-chartered	Club/restaurant/tavern	18	Kaiapoi
Kiwi Gaming Foundation	Kaikanui Tavern	Non-club	Tavern	18	Kaiapoi
Youthtown Incorporated	Mandeville Tavern	Non-club	Tavern	9	Kaiapoi
The Lion Foundation 2008	Pineacres Restaurant and Bar	Non-club	Restaurant/tavern	9	Kaiapoi
The Lion Foundation 2008	Mainstreet Sports Bar	Non-club	Tavern	18	Rangiora
Aotearoa Gaming Trust	Plough Hotel	Non-club	Restaurant/tavern	18	Rangiora
Rangiora Returned Services Association Club Inc	Rangiora RSA Club	Club - RSA	Club/restaurant/tavern	18	Rangiora
Aotearoa Gaming Trust	The Brook Bar and Eatery	Non-club	Restaurant/tavern	18	Rangiora
Oxford Workingmens Club & MSA Inc	Oxford Workingmens Club & MSA	Club-chartered	Club/restaurant/tavern	12	Oxford
Kiwi Gaming Foundation	Woodend Tavern	Non-club	Tavern	16	Woodend

Source: DIA. (2026). *Class 4 Gambling Venue and Gaming Machine Numbers - Quarterly Lists.*

Historical data indicates that gambling opportunities in the district have changed over time. In 2004, Waimakariri had 18 Class 4 gambling venues and 230 EGMs. While there were some fluctuations over the intervening years, the overall trend has been a decline in both venues and machines. From 2021 to March 2025, the number of venues remained at 11 and the

number of EGMs remained at 165. However, between April and December 2025, the number of EGMs at the Woodend Tavern was reduced by two. As a result, by December 2025, the district had 11 venues and 163 EGMs (Figure 8).

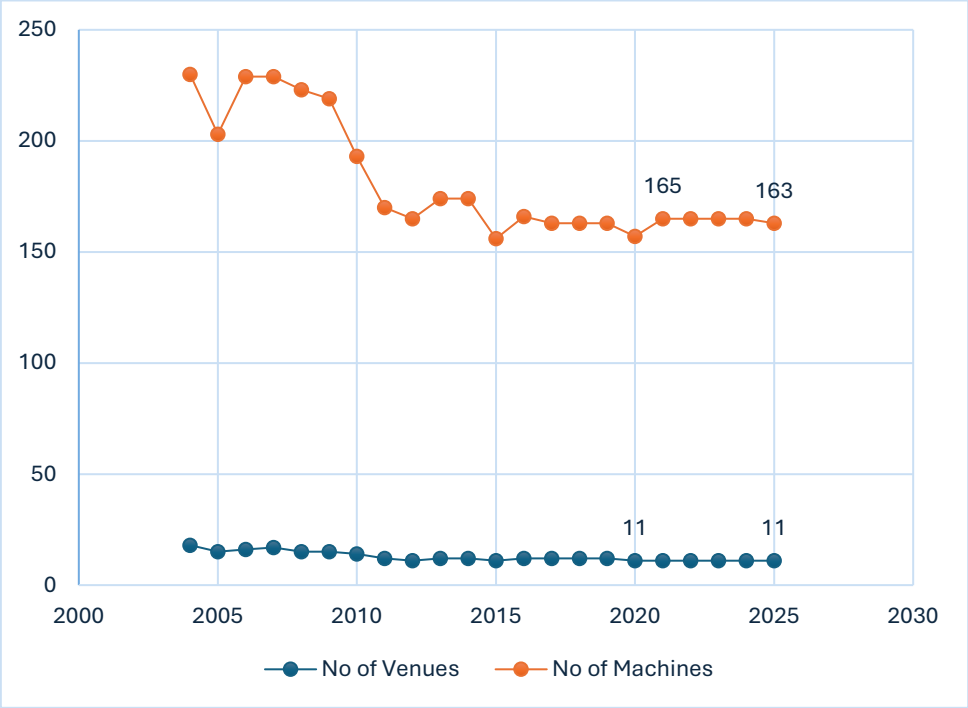


Figure 8: Changes in gambling venues and EMGs in Waimakariri from 2004 to 2025

Source: DIA. (2026). *Class 4 Gambling Venue and Gaming Machine Numbers - Quarterly Lists.*

5.2. Proximity of Gambling Venues to Community-Sensitive Sites in Waimakariri

The current review found that four Class 4 gambling venues in the district are located within residential zones under the Partially Operative District Plan 2025. These venues have been continuously licensed since October 2001.[17]

Additionally, all venues were mapped using 100 metre and 500 metre buffer zones to assess their proximity to six community-sensitive sites: early childhood education centres, schools, parks and playgrounds, libraries, community centres or meeting halls, and places of worship. This assessment identified that some community-sensitive sites, including early childhood education centres and schools, are located in close proximity to Class 4 gambling venues, as shown in Table 10. Maps illustrating the locations of gambling venues and community-sensitive sites are provided in Appendix 4.

[17] The Class 4 Gambling Venue Policy has limited or no effect on venues established as of 17 October 2001 if:
- they have been continuously licensed since October 2001, or
- any unlicensed period was for less than six months.

Table 10: Proximity of Class 4 Gambling Venues in Waimakariri to Community-Sensitive Sites

No	Class 4 gambling venue	Number of sensitive sites within 100m buffer zone	Number of sensitive sites within 500m buffer zone
1	The Plough Hotel - Rangiora	None	- Three Parks and playgrounds - One early childhood education centre - One community/meeting hall - One school on the periphery
2	Rangiora RSA Club	One places of worship	- Two parks and playgrounds - One library - Three community/meeting halls - Two schools - Two early childhood education centres - Five places of worship
3	The Brook Bar and Eatery - Rangiora	None	- Two schools - One early childhood education centre - One park and playground - One places of worship periphery
4	Mainstreet Sports Bar - Rangiora	One community/meeting hall One places of worship	- Two parks and playgrounds - Three places of worship - One library - Two community/meeting halls - Three early childhood education centres
5	Pineacres Restaurant and bar	None	- None
6	Kaikanui Tavern - Kaiapoi	One early childhood education centre	- Three early childhood education centres - Four places of worship - Three parks and playgrounds - One school - One community/meeting hall - One library
7	Craft Bar and Kitchen - Kaiapoi	None	- Five parks and playgrounds - Five places of worship - Two community/meeting halls - One library - One early childhood education centre - One school
8	Kaiapoi Workingmens Club	None	- Seven parks and playgrounds - Two schools - Four community/meeting halls

			- One library - Six places of worship - Two early childhood education centres
9	Mandeville Tavern - Kaiapoi	None	- Seven parks and playgrounds - Two schools - Four community/meeting halls - One library - Six places of worship - Two early childhood education centres
10	The Woodend Tavern	One early childhood education centre	- One school - Two early childhood education centres - Two parks and playgrounds
11	Oxford Workingmens Club and MSA	One early childhood education centre One places of worship	- One Park and playground on the periphery - Three places of worship - One community/meeting hall

Source: Internal data, 2026

6. VULNERABILITY TO GAMBLING HARM

Gambling venue policies may include both proactive and reactive measures to minimise gambling harm. This requires a sound understanding of which segments of the community are vulnerable to gambling harm. Research has identified that, in NZ, gambling-related harm is not experienced equally across ethnic groups. In addition, individuals living in areas of high socio-economic deprivation, as well as those residing in closer proximity to gambling venues, are more vulnerable to gambling-related harm.

6.1. Ethnicity and gambling harm

A number of studies show that gambling harm is more concentrated among Māori and Pacific peoples.[18] Compared with their representation in the total NZ population, Māori and Pacific peoples account for a disproportionately high share of problem gambling. Māori, who make up approximately 15% of the population, account for 31.5% of the cost of problem gambling, while Pacific peoples, who represent 6.4% of the national population, account for 10.9% of the cost of problem gambling.[19] Gambling behaviour across key ethnic groups, and their respective contributions to problem gambling costs, are presented in Table 11.

Table 11: Distribution of gambling behaviour and harm in NZ by ethnic groups

	European and other	**Māori**	**Pacific**	**Asian**
Proportion of New Zealanders	61.0%	15.0%	6.4%	17.6%
Proportion of people who gamble	63.6%	16.6%	6.1%	13.7%

[18] Rockloff, M., Bellringer, M., Lowe, G., Armstrong, T., Browne, M., Du Preez, K. P., ... & Greer, N. (2021). *Life course and legacy gambling harms in New Zealand*. Ministry of Health Manatū Hauora.

[19] Browne M, Tulloch C, Dellosa G, et al. (2025). Economic and Social Costing of Gambling in Aotearoa New Zealand 2023-24. Wellington: Ministry of Health.

Contribution to cost of problem gambling	42.8%	31.5%	10.9%	14.9%

Source: Browne M, Tulloch C, Dellosa G, et al. (2025). *Economic and Social Costing of Gambling in Aotearoa New Zealand 2023-24.* Ministry of Health.

The distribution of gambling problems in NZ, as reported by the Ministry of Health (2025), is presented in Table 12.[18] Māori have the highest prevalence of problem gambling (2.0%), while Pacific peoples show the highest levels of moderate-risk gambling (5.2%). Both Māori and Pacific peoples have higher rates of low- and moderate-risk gambling compared with European/Other groups, indicating disproportionately higher exposure to gambling-related harm.

Table 12: Distribution of gambling problems by ethnicity, 2023/24

Gambling problem	European/Other	Māori	Pacific	Asian
Non-gamblers	33.5%	30.0%	35.7%	49.1%
Non-problem gambling	57.7%	52.8%	43.5%	37.0%
Low-risk gambling	4.1%	9.5%	8.8%	8.3%
Moderate-risk gambling	1.4%	2.9%	5.2%	2.0%
Problem gambling	0.3%	2.0%	0.3%	0.0%

Source: Browne M, Tulloch C, Dellosa G, et al. (2025). *Economic and Social Costing of Gambling in Aotearoa New Zealand 2023-24.* Ministry of Health.

There are no district-level data available to determine the extent of gambling-related inequities experienced by Māori and Pacific peoples in Waimakariri.

6.2. Socio-economic deprivation and gambling harm

A number of research studies indicate that people living in areas of high socio-economic deprivation are more vulnerable to gambling-related harm. For example, a study using data from nationally representative NZ health surveys conducted in 2008, 2010, and 2018 found that individuals residing in highly deprived areas were 4.5 times more likely to experience gambling harm than those living in areas with lower levels of deprivation. [20]

Another study undertaken to understand knowledge, views, and experiences of gambling and gambling-related harms in different ethnic and socio-economic groups in NZ in 2012 found that the likelihood of experiencing gambling harm increased with the socio-economic deprivation index. Individuals residing in areas with high socio-economic deprivation were twice as likely to report that their families had experienced gambling harm.[21]

Similar to national patterns, most Class 4 gambling venues in Waimakariri operate in areas with moderate to high socio-economic deprivation (deciles 7–10) (Table 13). Appendix 3 presents maps showing the locations of existing Class 4 gambling venues in relation to socio-economic deprivation across Waimakariri.

At the Council level, there are limitations in understanding gambling harm across areas with differing levels of socio-economic deprivation within the district. Local data is limited, and simple comparisons between areas can be misleading due to differences in population characteristics and exposure to gambling. Therefore, this assessment makes a reasonable

[20] Tu, D., Gray, R. J., & Walton, D. K. (2014). *Household experience of gambling-related harm by socio-economic deprivation in New Zealand: increases in inequality between 2008 and 2012*. International Gambling Studies, 14(2), 330-344.;
[21] Pickernell, D., Keast, R., & Brown, K. (2010). Social clubs and social capital: The effect of electronic gaming machines in disadvantaged regions on the creation or destruction of community resilience. In 14th Annual Conference of the International Research Society for Public Management (pp. 1-22).

assumption, based on existing research, that gambling related problems is likely to be higher in socio-economically deprived areas of Waimakariri.

Table 13: Distribution of Class 4 Gambling Venues in Waimakariri by areas of socio-economic deprivation

NZDep2023 decile (based on Statistical Area (SA) 2	Number of gambling venues
1-2	0
3-4	1
5-6	3
7-8	5
9-10	2

Source: DIA. (2025). Gaming Machine Profits (GMP) Quarterly Report – December 2025.

6.3. Proximity to Gambling Venues as a Risk Factor for Gambling Harm

A number of studies have identified proximity to gambling venues as a factor that may influence gambling behaviour and the risk of gambling-related harm, including problem gambling. For instance, research from Australia found that people living closer to gambling venues were more likely to participate in gambling activities than those living further away. Specifically, individuals residing within 250 metres of a gambling venue were six percentage points more likely to gamble than those living more than two kilometres from a venue.[22] Accordingly, reducing the availability and accessibility of EGMs is widely recognised as one approach to reducing gambling-related harm [23].

7. FINDINGS FROM TARGETED STAKEHOLDER ENGAGEMENT

Targeted stakeholder engagement was undertaken with gambling harm minimisation organisations, corporate societies, and gambling grant recipients to gather information on the current gambling environment within the district, associated harms, and potential community benefits. Stakeholder feedback is presented as part of the social baseline and complements quantitative demographic and gambling-related data. Appendix 2 provides a comprehensive list of all stakeholders consulted.

7.1. Feedback from gambling harm minimisation organisations

Gambling harm minimisation organisations provided feedback on both the Class 4 Gambling Policy and the TAB Venue Policy. A summary of this feedback is presented in Table 14.

Table 14: Summary of feedback from gambling harm minimisation organisations

Organisation	Summary of feedback
National Public Health Service	**Comments and suggestions for the Class 4 Gambling Policy** Most gambling venues in Waimakariri operate in areas with high socio-economic deprivation. The current policy does not address this issue. It is recommended that a criterion to be added to restrict venues and EGMs in areas of high socio-economic deprivation (Deciles 7-10).

[22] Badji, S, Black, N, Johnston, D 2021, Proximity to gambling venues, gambling behaviours and related harms, Victorian Responsible Gambling Foundation, Melbourne.

[23] Russell, A. M., Browne, M., Hing, N., Rockloff, M., Newall, P., Dowling, N. A., ... & Woo, L. (2023). Electronic gaming machine accessibility and gambling problems: A natural policy experiment. Journal of Behavioral Addictions, 12(3), 721-732.

	Under the current per capita cap policy, new venues can be established as population increases. It is recommended that the Council implement a sinking lid policy, which would prohibit the transfer of EGM licenses. This would ensure that when a venue closes, the number of EGMs and venues gradually decreases over time. If a sinking-lid policy is not adopted, it is recommended that the Council implement an absolute cap of 165 EGMs in the district, rather than a cap based on the ratio of EGMs to population. Clause 4.2.12 allows the relocation of EGMs to any neighbourhood, regardless of socio-economic deprivation. If an additional criterion restricting the relocation of venues and EGMs within areas of high socio-economic deprivation is not added to the policy, it is recommended that such a criterion be included, at a minimum, in Clause 4.2.12. **Comments and suggestions for the TAB venue policy** It is recommended that the policy not allow the establishment of standalone TAB venues. The Council's statutory obligation is limited to adopting a TAB venue policy; there is no legal requirement to permit standalone TAB venues within the district.
Problem Gambling Foundation	**Comments and suggestions for the Class 4 Gambling Policy** Pokie grants may support local community groups, sports, and services, but it is important to consider where the money comes from, not just where it goes. Evidence consistently shows that the distribution of Class 4 gambling funds is inequitable, with funds often failing to return to the communities where they were generated. We recommend the Council to consider the proven benefits of a comprehensive sinking lid policy, including provisions to prohibit new venues, pokie machine relocations, and club mergers.
Asian Family Services	The current policy does not place sufficient restrictions on the location of gambling venues. There are no exclusion zones around high-risk or high-deprivation areas, where gambling harm is more prevalent. There are also no limits on venue clustering, which can increase harm by concentrating gambling outlets in vulnerable communities. In addition, the relocation clause (Section 4.2.12) allows venues to move and continue operating. It is recommended to: • Establish strict exclusion zones around high-deprivation areas, schools, churches, marae, social service providers, and mental health and addiction support services. • Use harm mapping and socio-economic data to guide location decisions and prevent new venues from being established in areas already experiencing gambling harm. • Prohibit venue clustering within a specified radius (e.g., 1–2 km) to avoid the oversaturation of gambling venues in any one community.

	• Adopt a sinking lid policy to progressively reduce the number of gambling venues and gaming machines in the district. **Comments and Suggestions for the TAB Venue Policy** It is recommended adopting a policy that restricts the establishment of new TAB venues within the district.
Mapu Maia	**Comments and Suggestions for the Class 4 Gambling Policy** • Pacific peoples are consistently identified in national surveys as having the highest risk of developing problem gambling compared with other ethnic groups. Approximately 1,104 Pacific peoples live in the Waimakariri District. • We suggest strengthening requirements for new Class 4 venues to reduce the concentration of gaming machines in specific areas, thereby minimising the risk of problem gambling. • We also recommend preventing venues from merging, as mergers often result in larger venues with more gaming machines, which can increase the risk of gambling harm. • It is suggested that the Council adopt a sinking lid policy to reduce the overall risk of problem gambling. **Comments and Suggestions for the TAB Venue Policy** Adopt a policy that restricts the establishment of TAB venues in the district.

7.2. Summary of feedback from corporate societies and grant recipients

Surveys conducted with corporate societies and randomly selected grant recipients collected information on the condition that all information provided would be treated as confidential and that the Council would not report feedback in a way that could identify individual organisations. Therefore, the main body of this assessment report contains only a summary of their collective feedback.

All responding corporate societies support the current population-based cap policy for regulating the number of EGMs in the district. They also support the continuation of the current relocation policy.

Corporate societies provided qualitative information to help understand the nature of Class 4 gambling activities in the district, as detailed below.

- Factors influencing people to participate in Class 4 gambling include entertainment, financial need, stress relief, advertising and promotional incentives, and family or cultural traditions.
- The time an average gambler spends playing typically ranges from 10 minutes to two hours per week.
- Participation in Class 4 gambling in Waimakariri has been mostly stable or has moderately decreased over the past 12 months. Perceived reasons for this trend include increasing participation in online gambling, which is easily accessible and largely unregulated, as well as rising living costs.

- The number of gamblers visiting a venue may vary depending on the day of the week. On average, it ranges from 40 to 60 gamblers per day.
- Certain demographic groups are more affected by problem gambling than others. These include Māori and Pacific peoples, Asians, and European women aged over 60.
- Strengthening restrictions on the number of EGMs operating in the district could lead to increased participation in online gambling, which is not yet regulated in NZ. Respondents also highlighted that tighter restrictions may reduce the level of funding received by community organisations through grants.
- A range of gambling harm minimisation interventions are in place at venues in compliance with the Gambling Act and the Class 4 Gambling Venue Policy. These interventions include:
  - All venue staff receive extensive harm minimisation training.
  - Staff conduct three sweeps of the gambling area per hour to monitor player behaviour.
  - Information on problem gambling and related support services is made readily available.
  - Venues maintain documented harm minimisation policies and procedures.
  - Age restrictions prohibit people under 18 years of age from playing gambling machines.
  - Gaming machines do not accept banknotes greater than NZ$20.
  - Cash withdrawals from ATMs are supervised, with a maximum of two withdrawals permitted.

Summary of feedback from grant recipients:

- Altogether, five grant recipients provided feedback.
- Out of the five, four mentioned the challenges they experience in funding their projects and emphasised the importance of the grants they receive from corporate societies to continue their activities.
- If there were any reduction in grants, or if grants were not available to them, it would lead to a reduction in the number of projects that require considerable funding.
- One grant recipient stated that there would be minimal or no impact if grants were not available to them.
- Four grant recipients indicated the need for the Council to take a balanced approach to regulating Class 4 gambling, as it provides practical benefits to the community. They also highlighted the importance of taking necessary actions to control or minimise gambling harm within the community.

8. SOCIAL IMPACTS OF CLASS 4 GAMBLING

8.1. Benefits of Class 4 Gambling

Class 4 gambling generates benefits across several areas, including entertainment, employment, and the distribution of profits to non-profit organisations for authorised purposes such as sport, research and education. The following section outlines the community benefits of Class 4 gambling in Waimakariri.

8.1. 1. Electronic gaming machines as a source of entertainment and a means of socialising

There is evidence that some people use EGMs for entertainment, social interaction, and to alleviate loneliness. However, up-to-date data is not available to accurately determine the

extent to which New Zealanders rely on EGMs for entertainment and socialisation. This report nevertheless acknowledges that Class 4 gambling provides entertainment for some people in the community and serves as a way of socialising for individuals who experience loneliness.

8.1.2. Employment opportunities created through Class 4 gambling

Section 67 of the Gambling Act requires gambling venues to be managed by suitably qualified staff who are responsible for supervising gambling activities and identifying and responding to gambling-related harm. These requirements support employment opportunities for community members. However, there is currently no published data available to quantify the number of employment opportunities created by Class 4 gambling in Waimakariri in recent years. However, the Council is aware that Class 4 gambling venues provide livelihoods for some members of the local community.

8.1.3. Community funding

National level "pokie grant" data published by the DIA show that in 2024, a total of $345.66 million was distributed to communities through grants.[24] This funding was provided by 33 grant-making societies (corporate societies), and a total of 8,887 organisations received grants nationwide (Figure 9). The highest amount of grant funding was allocated to sports activities in 2024, totalling $177.45 million.[25]



Figure 9: National overview of pokie grants

Source: DIA. (2026). DIA Dashboard – Explore Pokie Data

District-level data shows that organisations within Waimakariri received approximately $1.7 million in grants from corporate societies in 2024 across multiple funding categories, including sport, community, research and education, arts and culture, and health and welfare (Table 15). Of all categories, sports received the largest share of funding ($1,031,632.99). The Canterbury Rugby Football Union Incorporated was the single largest recipient of grant funding in 2024, receiving $81,000.[25]

Table 15: Grant Funding by Category in Waimakariri, 2024

Category	Amount Granted ($)
Sport	1,031,623.99
Community	308,372.22
Research and Education	177,448.20
Art and Culture	114,277.00
Health Welfare Rescue Services	50,042.73
TOTAL	**1,681,764.14**

[24] DIA. (2026). DIA Dashboard – Explore Pokie Data. Available at: https://granted.govt.nz/dashboard

Source: DIA. (2026). DIA Dashboard – Explore Pokie Data

The total value of grants received from Class 4 gambling in Waimakariri between 2020 and 2024 is presented in Table 16. Following 2020, annual grant funding remained relatively stable, ranging between approximately $1.6 million and $1.7 million.

Table 16: Total Grant Funding Received in Waimakariri, 2020–2024

Year	Amount Granted ($)
2020	966,222
2021	1,641,656
2022	1,641,656
2023	1,692,517
2024	1,681,764

Source: DIA. (2026). DIA Dashboard – Explore Pokie Data

8.2. Gambling harm

A broad spectrum of negative consequences can arise from Class 4 gambling, affecting gamblers themselves, their families, communities, and wider society. This includes financial harm, relationship disruption, health impacts, cultural harm, impacts on work or study, criminal activity, and legacy, life-course, and intergenerational harm. Gambling harm also results in broader government and community costs, including the development, funding, and implementation of harm-reduction policies and interventions.

The NZ Gambling Survey 2023/24 provides updated insights into the prevalence of gambling harm in the country using the Problem Gambling Severity Index (PGSI). The PGSI is a widely used, standardised screening tool designed to identify levels of gambling-related risk; however, it does not provide a formal clinical diagnosis. According to the survey, 5.93% of adults (aged 15 years and over) were classified as low-risk gamblers, 1.94% as moderate-risk gamblers, and less than one percent (0.47%) were identified as problem gamblers (Browne et.al., 2025).[18] District level statistics are not available to understand the prevalence of gambling harm in Waimakariri.

The next section provides available evidence on the adverse impact of Class 4 gambling in Waimakariri.

8.2.1. Class 4 Gambling Expenditure in Waimakariri

Gaming Machine Profit (GMP) represents the total amount lost by users of EGM associated with Class 4 gambling. In Waimakariri District, GMP increased consistently between 2020 and 2024, rising from $7.5 million to $10.3 million (Table 17).[21] Compared with 2024, GMP had increased by a further $391,107 by December 2025.

In comparison with other Canterbury districts, Christchurch recorded the highest GMP in 2024 at $93.7 million, followed by Timaru at $11.0 million. Waimakariri ranked third with an estimated GMP of $10.3 million.[21]

Between December 2023 and December 2024, Waimakariri's annual nominal GMP increased by $366,907.56, equivalent to a 3.7% increase.

Table 17: Gaming Machine Profit in Waimakariri, 2020 to 2024

Year	Annual nominal GMP ($)
2020	7,513,554.19
2021	8,817,069.33
2022	9,519,795.71
2023	9,933,829.14
2024	10,300,736.70
2025	10,691,843.36

Note: All values are nominal and have not been adjusted for inflation

Source: DIA. (2025). Gaming Machine Profits (GMP) Quarterly Report – December 2025.

A comparison of the number of EGMs, venues, and annual GMP in the district indicates that GMP continued to increase between 2020 and 2024, despite stable numbers of venues and a slight decrease in the number of EGMs. This trend suggests that growth in gambling expenditure is being driven by factors other than machine or venue availability.

Possible contributing factors include:

- Population growth within the district, resulting in an increased number of gamblers
- Higher average player spending
- Increased gambling frequency and longer play duration
- Inflationary pressures, which may contribute to higher nominal expenditure by players

Data comparing gambling spending with grant allocations reveal that in 2024, the funds returned to the district via grants represent roughly 16% of the overall GMP. Five years earlier, in 2020, approximately 13% of total gambling expenditure in Waimakariri was returned to the community. The proportion of GMP returned to the district shows a slight overall increase from 2020 to 2024, despite minor year-to-year fluctuations. Table 18 provides further details on annual GMP, the amount granted, and the percentage of GMP returned to Waimakariri between 2020 and 2024. Taken as a whole, Class 4 gambling results in an annual outflow of millions of dollars from the district. As explained in Section 2.1.3 of this report, there is no requirement for funds to be returned to the community in which they were raised. This means that the remaining funds may be distributed as grants to other communities.

Table 18: Annual Nominal Gaming Machine Profit and Amount Granted in Waimakariri

Year	Annual GMP	Amount Granted	Approximate % of GMP returned to Waimakariri
2020	7,513,554.19	966,222	13%
2021	8,817,069.33	1,276,554	14%
2022	9,519,795.71	1,641,657	17%
2023	9,933,829.14	1,692,517	17%
2024	10,300,736.7	1,681,764	16%

Source: DIA. (2025). *Gaming Machine Profits (GMP) Quarterly Report – December 2025*; DIA. (2026). *DIA Dashboard – Explore Pokie Data*.

8.2.2. Problem Gambling in Waimakariri

Individuals experience problems associated with gambling at varying levels. Ministry of Health intervention client data show that 4,731 individuals in New Zealand received gambling harm treatment services during the 2022/23 year as a result of participation in Class 4 gambling (Table 19).[25] This indicates that EGMs are the largest contributor to problem gambling in New Zealand compared with other forms of gambling.

Table 19: Clients assisted by primary problem-gambling mode (2022/23)

Form of gambling	Total number of clients assisted
Non Casino Gaming Machines (Class 4 gambling)	4731
Casino EGM	951
Casino Table (Electronic Table Games)	630
Lotteries Commission Products	1225
TAB NZ	1085
Cards	108
Housie	315
Other (NZ Other and Overseas)	1341

Source: Ministry of Health. (2025). Gambling harm intervention services data - Clients assisted by primary problem gambling mode.

According to the Ministry of Health Intervention Services Database, nine Waimakariri residents sought assistance between July 2020 and June 2023. It is important to note that this figure reflects people who sought treatment for gambling-related harm arising from all forms of gambling, not Class 4 gambling alone.

Overall, the number of individuals from Waimakariri accessing gambling-harm treatment services has declined over time (Figure 10). However, this data does not provide a complete picture of problem gambling in the district, as not all people experiencing gambling harm or problems access treatment services. It is acknowledged that some residents may be experiencing problem gambling and related harms but may choose not to disclose their experiences. As a result, the extent of gambling-related harm may be underrepresented in the available data.

[25] Ministry of Health. (2025). *Gambling harm intervention services data - Clients assisted by primary problem gambling mode.* Available at: https://www.health.govt.nz/monitoring-statistics/statistics-and-data-sets/gambling-harm/gambling-harm-services-data#toc-0-5

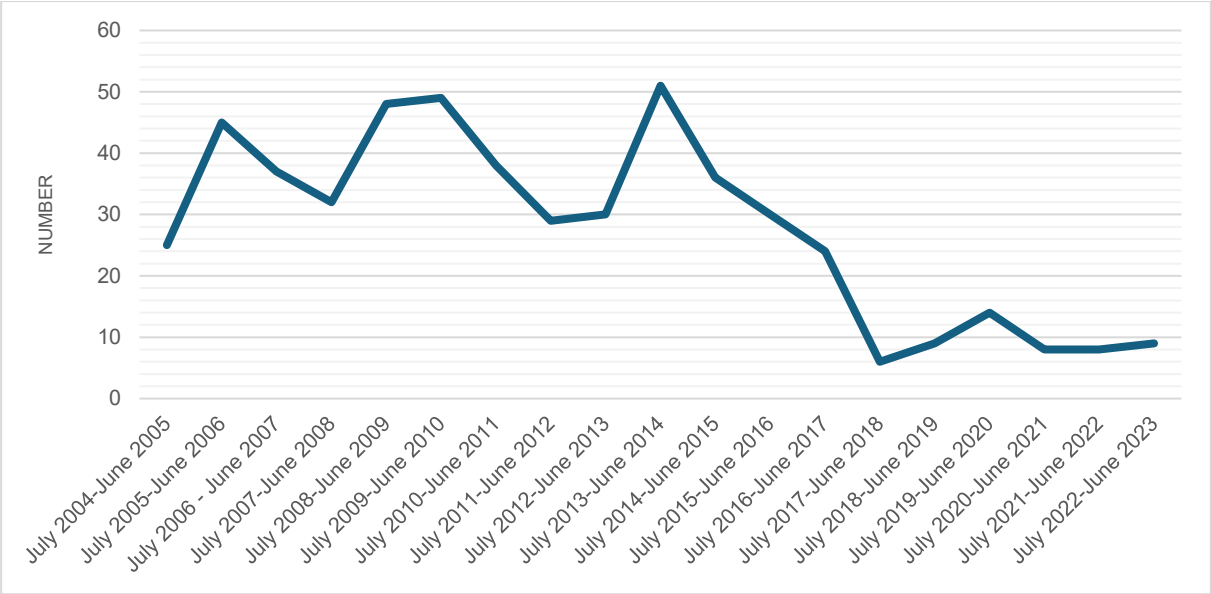


Figure 10: Number of individuals who accessed gambling harm treatment services in Waimakariri between July 2004 to June 2023 (all gambling related harm)

Source: Ministry of Health. (2025). Gambling harm intervention services data - Clients assisted by primary problem gambling mode.

The NZ Gambling Survey (2023/24) highlights the need to address problem gambling and associated harm in NZ at the national level. In the absence of district level data and statistics, this section summarises the costs of problem gambling in New Zealand to provide a clearer understanding of the nature and scope of gambling related harm and its impact on the national economy.

According to the Ministry of Health, the total estimated cost of all forms of gambling related problems in New Zealand for 2023/24 is approximately $4.219 billion.[18] Health related costs of gambling, which include impacts on quality of life for gamblers and affected others, as well as costs to the New Zealand health system, are estimated at $2.04 billion, accounting for 48.43% of the total estimated cost.[18] Table 20 presents details of the costs of gambling in New Zealand by cost category for 2023/24.

Table 20: Cost of all form problem gambling in NZ (2023/24)

Cost of gambling problem	Cost	Contribution
Financial impacts	$1,193,208,654	28.28%
Relationship disruption, conflict or breakdown	$185,225,197	4.39%
Health	$2,043,344,805	48.43%
Work or study impacts	$678,829,001	16.09%
Criminal activity	$54,347,468	1.29%
Life course harm (homelessness)	$5,203,623	0.12%
Other government or community costs	$58,768,750	1.39%
TOTAL COST	$4,218,927,498	

Source: Browne M, Tulloch C, Dellosa G, et al. (2025). *Economic and Social Costing of Gambling in Aotearoa New Zealand 2023-24.* Ministry of Health.

Electronic gaming machines (offshore online EMGs and Class 4 gambling) account for the majority of total problem gambling expenditure, which is estimated at $2.7 billion (63.5%).[18]

Offshore online EMGs represent the largest share of this cost, contribute an estimated $1.57 billion (39%). Class 4 gambling is the second-largest contributor, accounting for 24.5% of the total cost, which is approximately $984 million.[18]

9. CONCLUSIONS

Since the last review of the Council's Class 4 Gambling Venue Policy, the number of venues in Waimakariri has remained stable, while the number of EGMs has slightly decreased. This indicates no overall growth in gambling opportunities within the district.

Gambling provides some benefits to the district, including entertainment opportunities, employment, and funding for community projects through grants. Assessment findings indicate that reliance on these grants varies, with some organisations depending heavily on this funding while others are less reliant.

However, despite the stable numbers of venues and EGMs, the total amount of money lost in Class 4 gambling in Waimakariri continued to increase from 2020 to 2024. Therefore, the growth in gambling expenditure is being driven by factors other than machine or venue availability. The possible factors could be:

- Population growth within the district, resulting in an increased number of gamblers
- Higher average player spending
- Increased gambling frequency and longer play duration
- Inflationary pressures, which may contribute to higher nominal expenditure by players

Overall, the district incurs significant financial losses through Class 4 gambling, amounting to millions of dollars annually, with losses continuing to increase. As there is no requirement for funds to be redistributed locally, less than 20% of expenditure is returned to the district in the form of grants. As a result, the economic costs of gambling outweigh the financial benefits to Waimakariri.

Levels of problem gambling in the district are low, with fewer than 10 individuals accessing support services. However, this likely understates the broader extent of gambling harm, which extends beyond individuals to affect family members, partners, and the wider community through social, emotional, and financial impacts. The full scale of harm is difficult to quantify due to data limitations and underreporting.

The Council's approach to regulating Class 4 gambling seeks to balance harm minimisation with economic flexibility. While the district currently experiences low levels of identified problem gambling and no significant growth in gambling opportunities, a proportionate approach is considered appropriate. This supports managing potential risks without imposing unnecessary regulatory constraints.

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APPENDIX 1: CONTENT OF A CLASS 4 GAMBLING VENUE POLICY AND SUMMARY OF THE WAIMAKARIRI DISTRICT COUNCIL CLASS 4 GAMBLING VENUE POLICY

a) Content of a Class 4 Gambling Venue Policy, as specified by the Gambling Act 2003

The policy must specify whether Class 4 venues are permitted in the district and, if so, where they may be located.

In addition, the policy may specify:

a) any restrictions on the maximum number of gaming machines that may be operated at a Class 4 venue.

b) the matters the TA will consider when venues are re-located (relocation policy).

c) restrictions on the number of EGMs permitted on site when two or more clubs in the district merged.

In determining the contents of the policy, Section 101(4) of the Gambling Act allows TAs to have regard to any relevant matters, including:

a) the characteristics of the district and parts of the district;

b) the location of kindergartens, early childhood centres, schools, places of worship, and other community facilities;

c) the number of gaming machines that should be permitted to operate at any venue or class of venue;

d) the cumulative effects of additional opportunities for gambling in the district;

e) how close any venue should be permitted to be to any other venue;

f) what the primary activity at any venue should be.[26]

b) A summary of the current Waimakariri District Council Class 4 Gambling Policy (2022):

- The policy allows the establishment of new venues within the district, subject to a number of location restrictions (e.g., no venues permitted in residential zones as defined by the Partially Operative District Plan). Any restrictions on venues will only apply when societies apply for a territorial consent to establish a new venue.
- The policy uses a per capita cap to control the growth of EGMs. The number of EGMs permitted in the district is capped at a ratio of one EGM per 260 people aged 18 years and over.
- The policy requires gambling venues to meet specified harm minimisation standards (e.g., maintaining a host responsibility policy and a gambling harm minimisation policy, conducting staff training, and ensuring restrictions on the visibility of EGMs).

[26] DIA. (2021). Process for applying a gambling policy. Available at: https://www.dia.govt.nz/Gambling-territorial-authorities-applying-policies-process

- The policy allows the relocation of Class 4 gambling venues (relocation policy) where the proposed venue is intended to replace an existing venue within the district to which a Class 4 licence currently applies.

APPENDIX 2: LIST OF TARGETED STAKEHOLDERS CONSULTED AS A PART OF THE REVIEW PROCESS

Stakeholders involved in gambling harm reduction

1. National Public Health Service
2. Problem Gambling Foundation
3. Asian Family Services
4. Mapu Maia (Pasifika gambling support service)

Corporate societies who operate class 4 gambling venues in Waimakariri and associated organisations

1. The Lion Foundation 2008
2. Kaiapoi Workingmens Club & M S A Inc
3. Kiwi Gaming Foundation
4. Youthtown Incorporated
5. Oxford Workingmens Club & MSA Inc
6. Aotearoa Gaming Trust
7. Rangiora Returned Services Association Club Inc
8. Gaming machine association NZ

Randomly selected grant recipients

1. Waimakariri Community Arts Council
2. The Hope Community Trust
3. Woodend Bowling Club
4. Rangiora Toy Library Incorporated
5. Community Wellbeing North Canterbury Trust
6. Rangiora High School
7. Canterbury Hockey Association Incorporated
8. Swannanoa School
9. Southbrook School
9. Ashley School
10. Clarkville Playcentre
11. Kaiapoi Golf Club
12. Woodford Glen Speedway Assn Inc

13. Kaiapoi Rugby Football Club
14. Woodend Rugby Football Club
15. Woodend Rugby Football Club
16. Rangiora cricket club
17. Woodend school
18. Rangiora Youth Community Trust
19. Ashley Rakahuri School Board of Trustees

APPENDIX 3: LOCATIONS OF CLASS 4 GAMBLING VENUES IN RELATION TO SOCIO-ECONOMIC DEPRIVATION ACROSS WAIMAKARIRI.

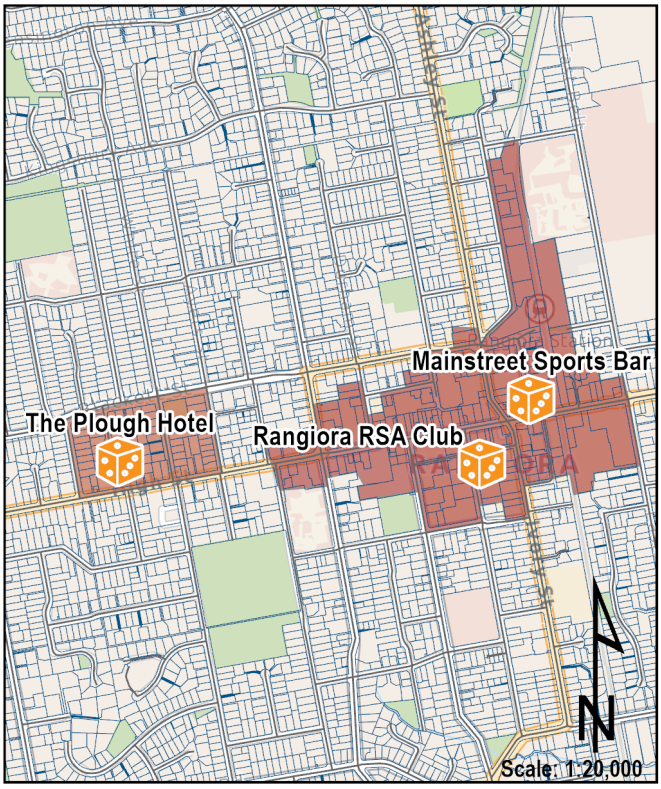
Rangiora

Gambling Venues

StasNZ Deprivation Index

- 1 - 2 (least deprived)
- 3 - 4
- 5 - 6
- 7 - 8
- 9 - 10 (most deprived)

Deprivation data source: https://www.arcgis.com/home/item.html?id=a357b7fb650d40fc9ffaaf48ef58275a
This dataset contains a selection of the Census 2018 data and the Index of Multiple Deprivation data including usually resident population counts, age group population counts household information and dwelling information by statistical area 1.
The data is sourced from the Census 2018 data published by Statistics New Zealand (StatsNZ) and Index of Multiple Deprivation by the Ministry of Health/ University of Otago. LINZ and Waimakariri District data: gambling venues, properties, roads.



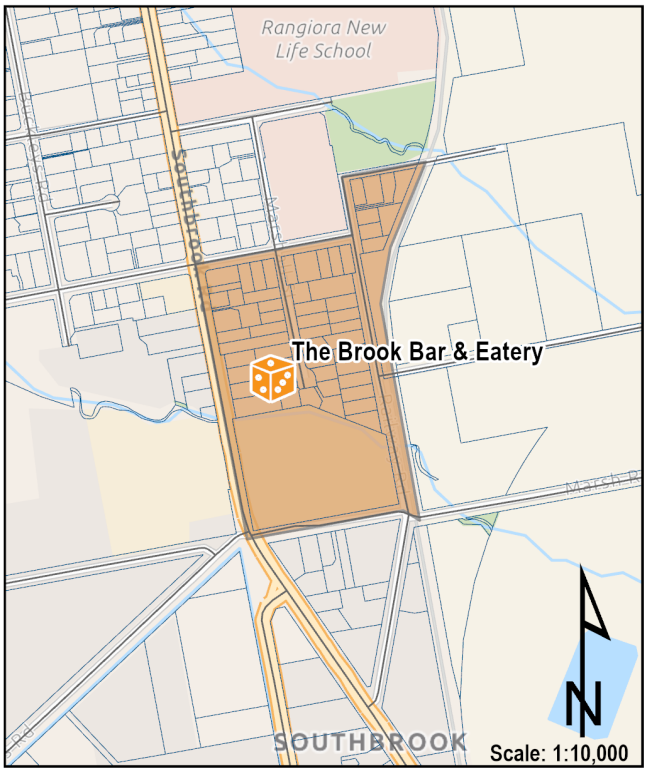
Rangiora cont'd

Gambling Venues

StasNZ Deprivation Index

- 1 - 2 (least deprived)
- 3 - 4
- 5 - 6
- 7 - 8
- 9 - 10 (most deprived)

Deprivation data source: https://www.arcgis.com/home/item.html?id=a357b7fb650d40fc9ffaaf48ef58275a
This dataset contains a selection of the Census 2018 data and the Index of Multiple Deprivation data including usually resident population counts, age group population counts household information and dwelling information by statistical area 1.
The data is sourced from the Census 2018 data published by Statistics New Zealand (StatsNZ) and Index of Multiple Deprivation by the Ministry of Health/ University of Otago. LINZ and Waimakariri District data: gambling venues, properties, roads.



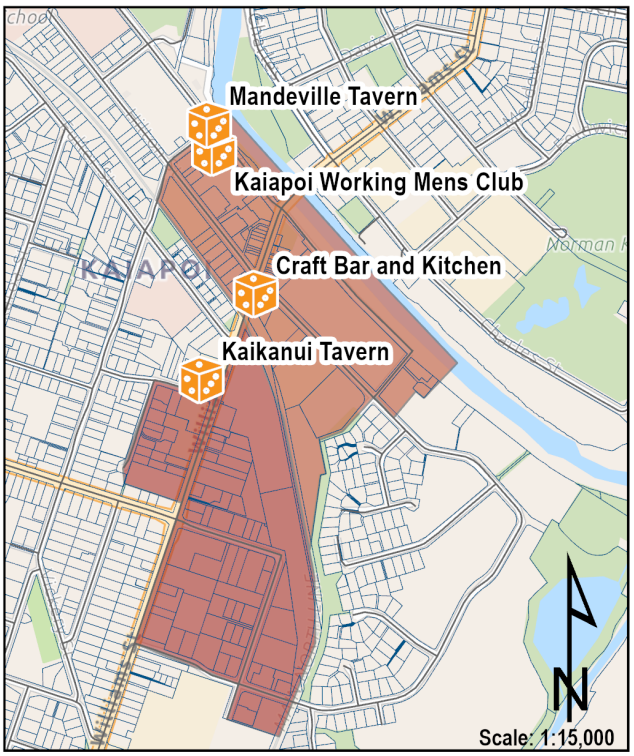
Kaiapoi

Gambling Venues

StasNZ Deprivation Index

- 1 - 2 (least deprived)
- 3 - 4
- 5 - 6
- 7 - 8
- 9 - 10 (most deprived)

Deprivation data source: https://www.arcgis.com/home/item.html?id=a357b7fb650d40fc9ffaaf48ef58275a
This dataset contains a selection of the Census 2018 data and the Index of Multiple Deprivation data including usually resident population counts, age group population counts household information and dwelling information by statistical area 1.
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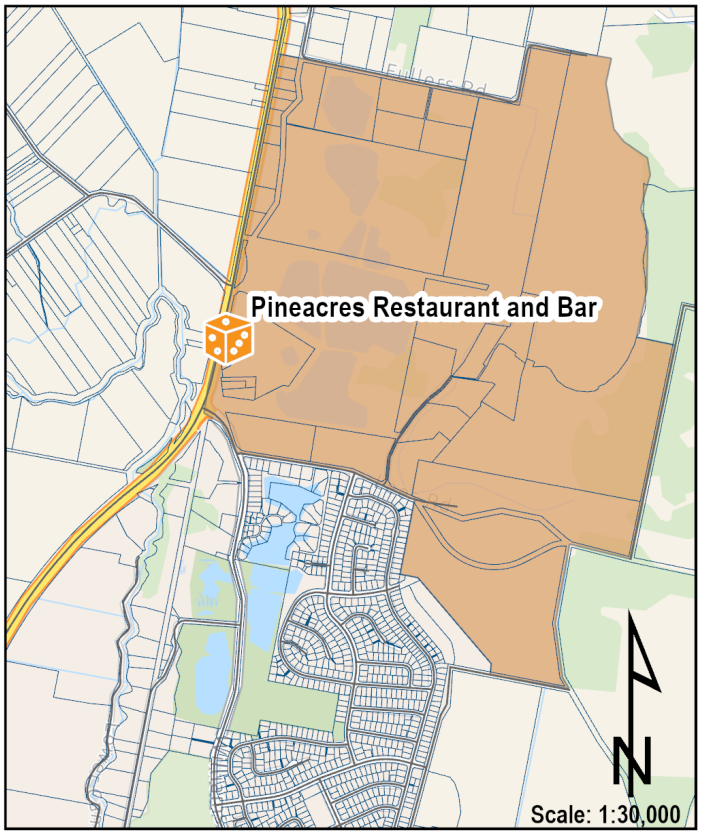
Kaiapoi cont'd

Gambling Venues

StasNZ Deprivation Index

- 1 - 2 (least deprived)
- 3 - 4
- 5 - 6
- 7 - 8
- 9 - 10 (most deprived)

Deprivation data source: https://www.arcgis.com/home/item.html?id=a357b7fb650d40fc9ffaaf48ef58275a
This dataset contains a selection of the Census 2018 data and the Index of Multiple Deprivation data including usually resident population counts, age group population counts household information and dwelling information by statistical area 1.
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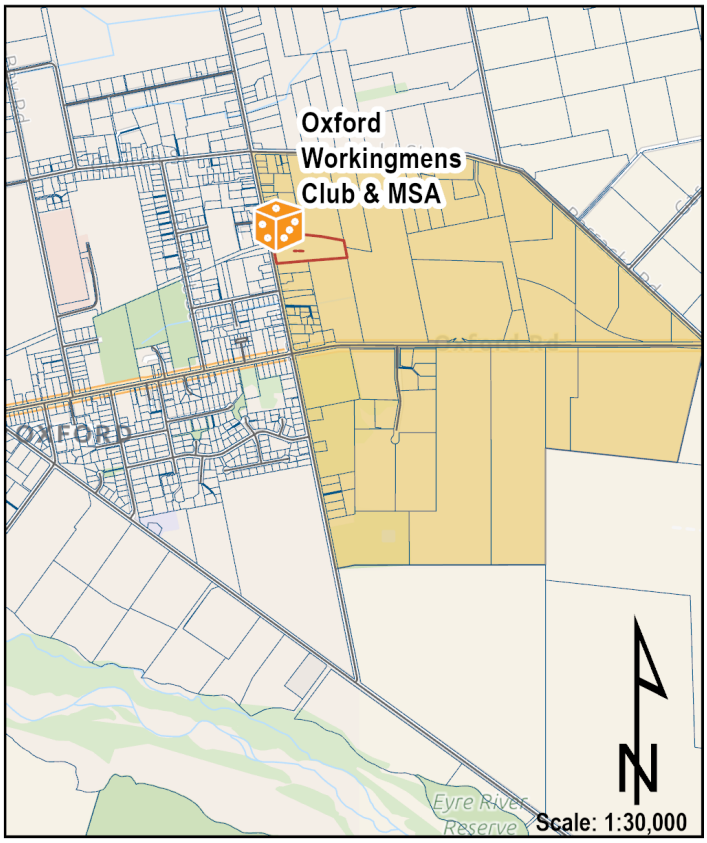
Oxford

Gambling Venues

StasNZ Deprivation Index

- 1 - 2 (least deprived)
- 3 - 4
- 5 - 6
- 7 - 8
- 9 - 10 (most deprived)

Deprivation data source: https://www.arcgis.com/home/item.html?id=a357b7fb650d40fc9ffaaf48ef58275a
This dataset contains a selection of the Census 2018 data and the Index of Multiple Deprivation data including usually resident population counts, age group population counts household information and dwelling information by statistical area 1.
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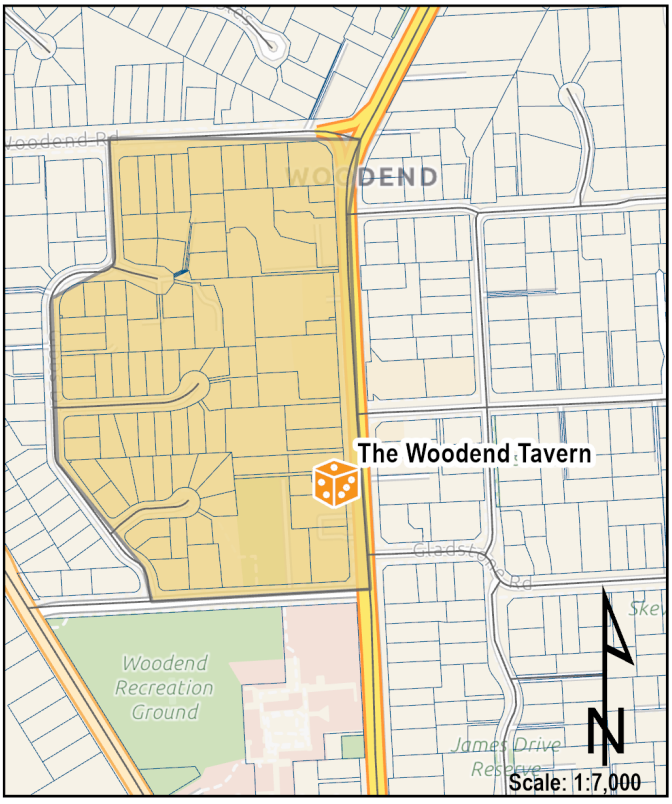
Woodend

Gambling Venues

StasNZ Deprivation Index

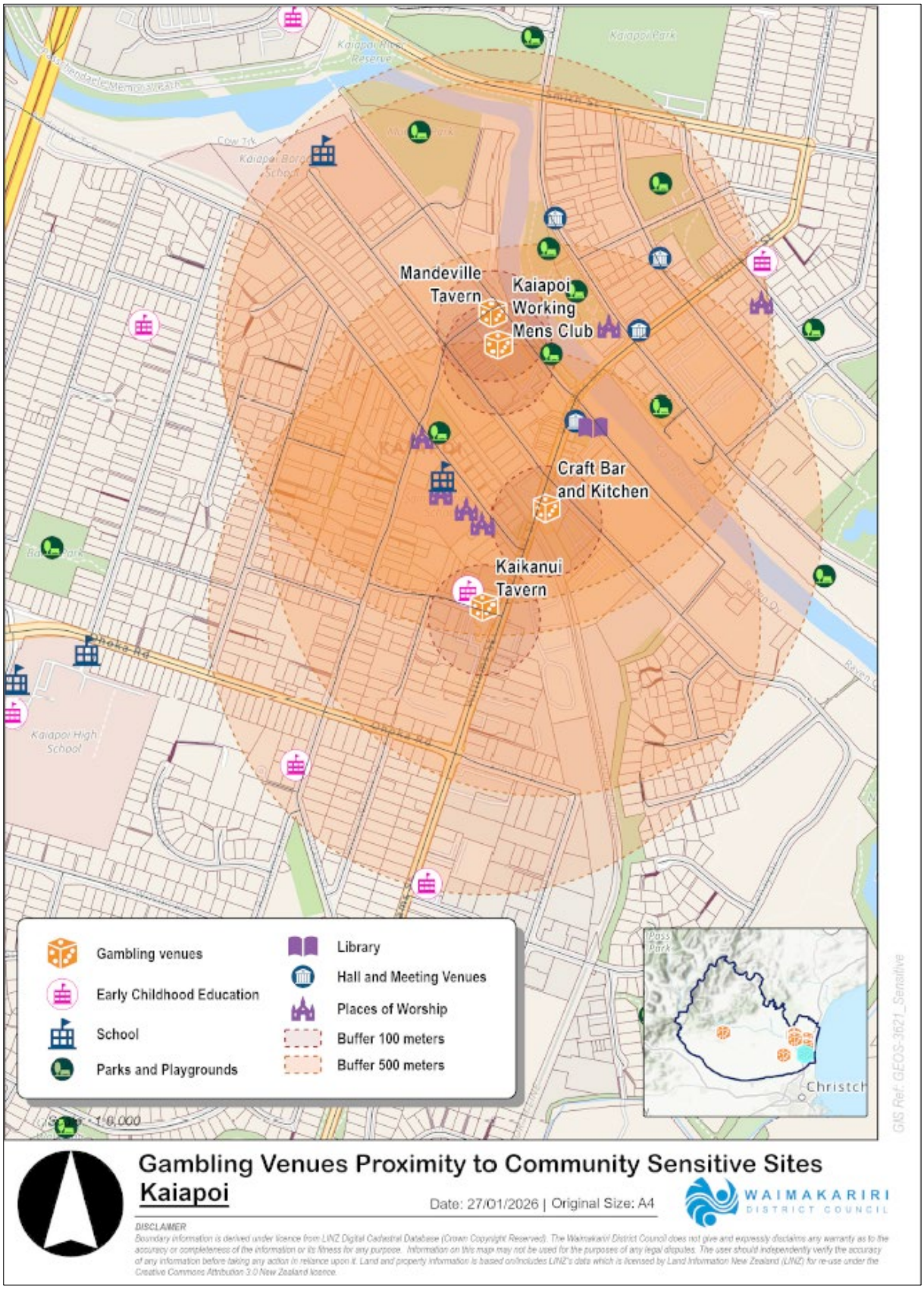
- 1 - 2 (least deprived)
- 3 - 4
- 5 - 6
- 7 - 8
- 9 - 10 (most deprived)

Deprivation data source: https://www.arcgis.com/home/item.html?id=a357b7fb650d40fc9ffaaf48ef58275a
This dataset contains a selection of the Census 2018 data and the Index of Multiple Deprivation data including usually resident population counts, age group population counts household information and dwelling information by statistical area 1.
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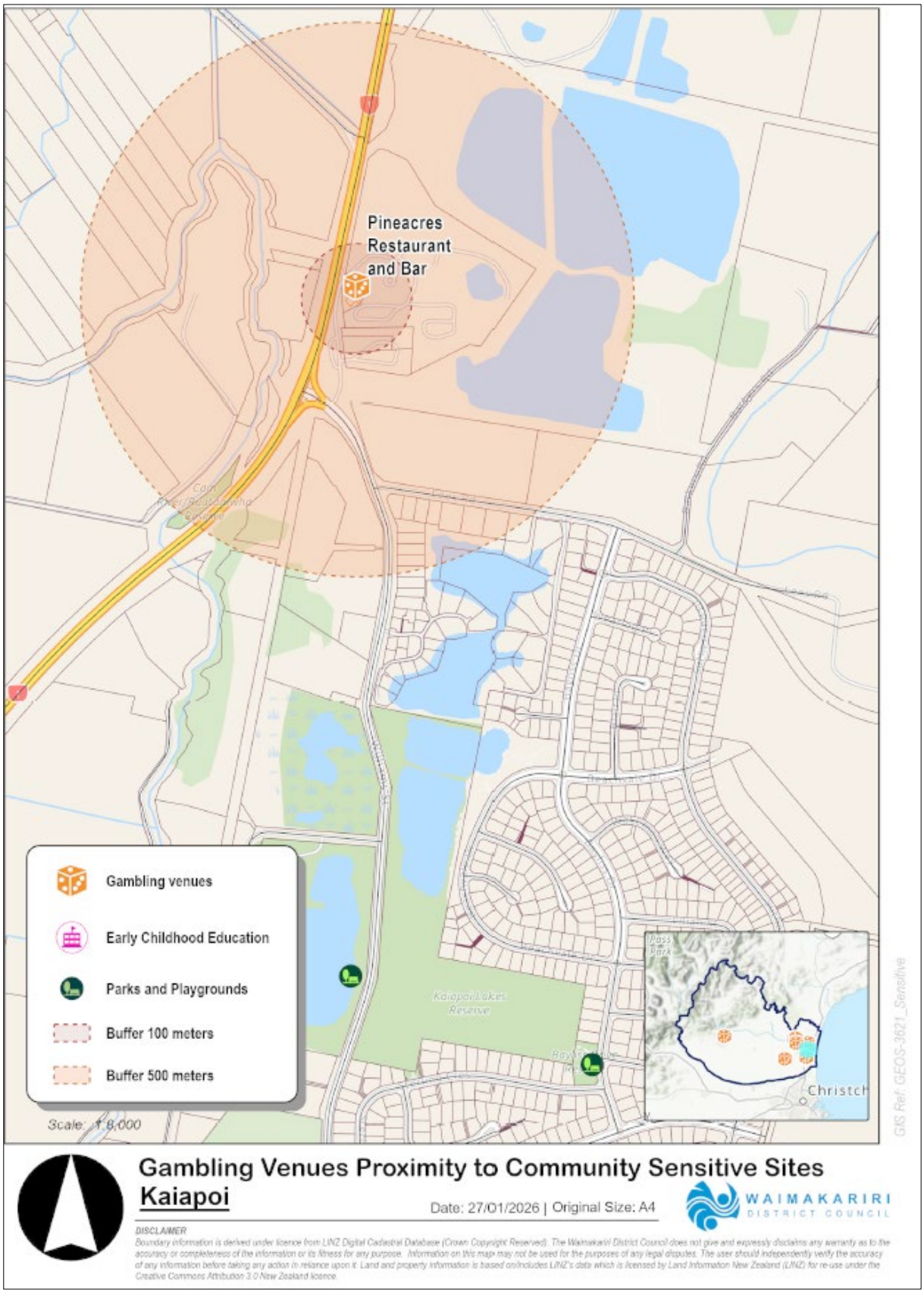


APPENDIX 4: PROXIMITY OF CLASS 4 GAMBLING VENUES TO COMMUNITY SENSITIVE SITES

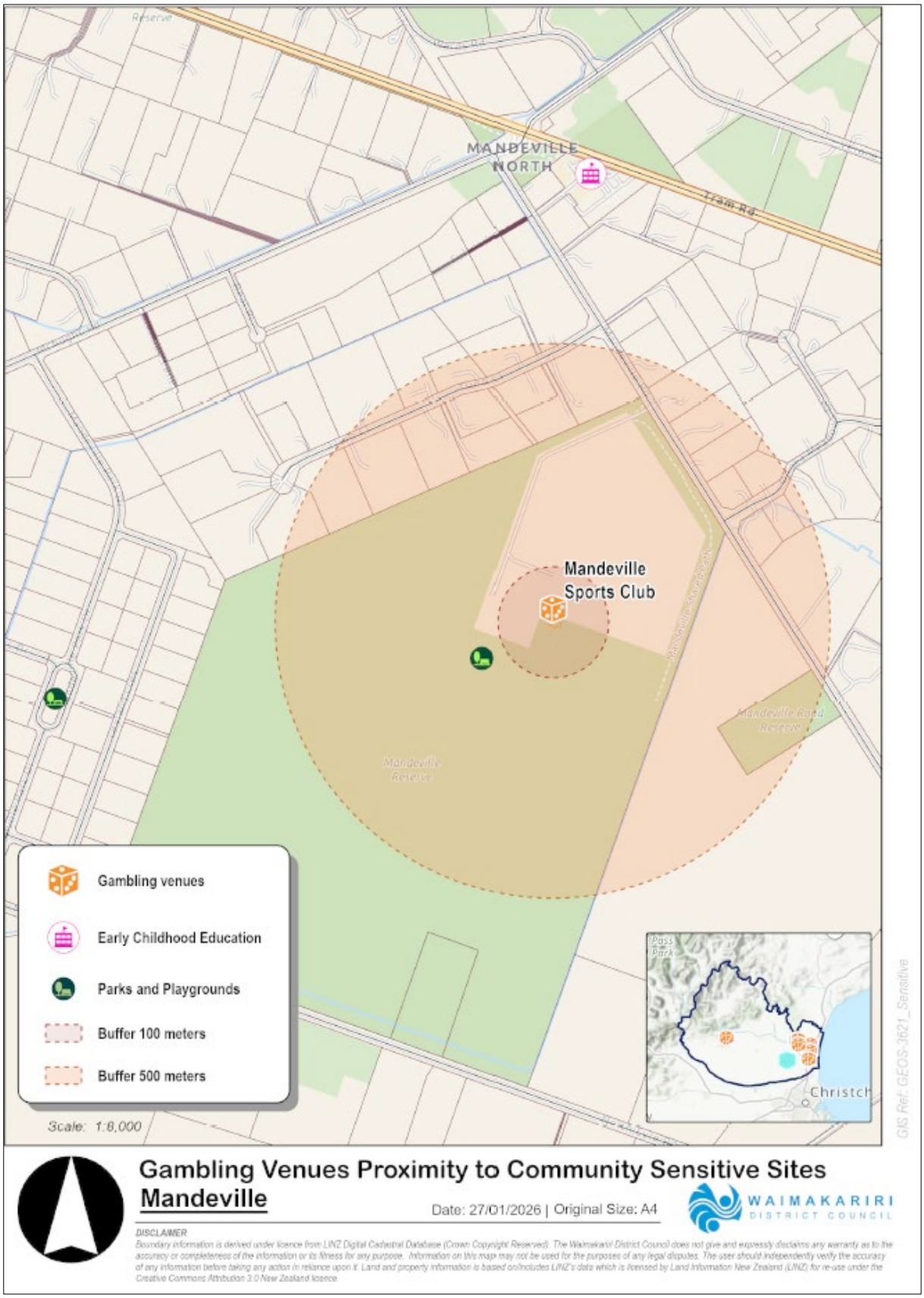
Class 4 gambling venues proximity to community sensitive sites in Kaiapoi



Class 4 gambling venues proximity to community sensitive sites in Kaiapoi



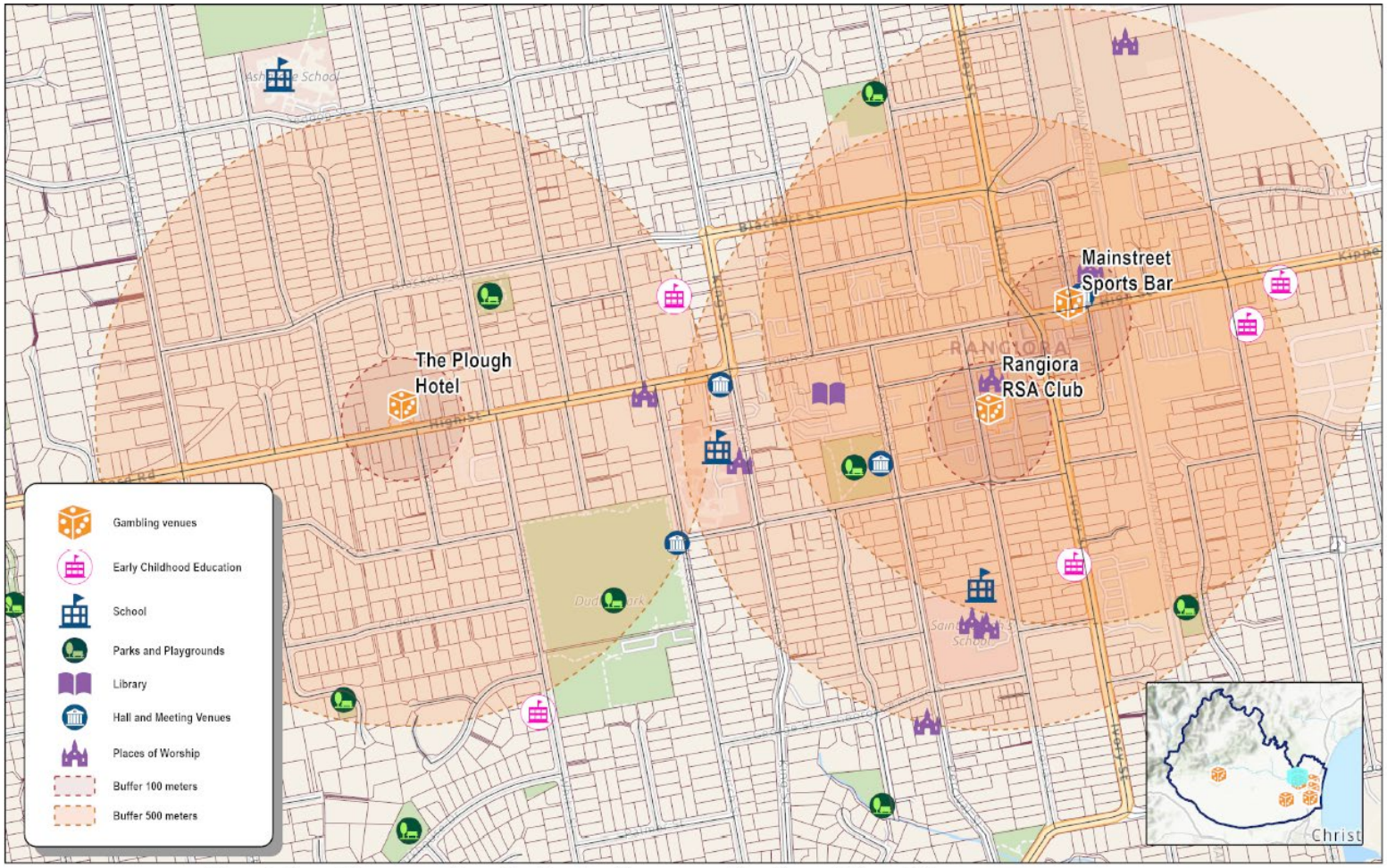
Class 4 gambling venues proximity to community sensitive sites in Mandeville



Class 4 gambling venues proximity to community sensitive sites in Oxford



Class 4 gambling venues proximity to community sensitive sites in Rangiora



Gambling Venues Proximity to Community Sensitive Sites

Rangiora

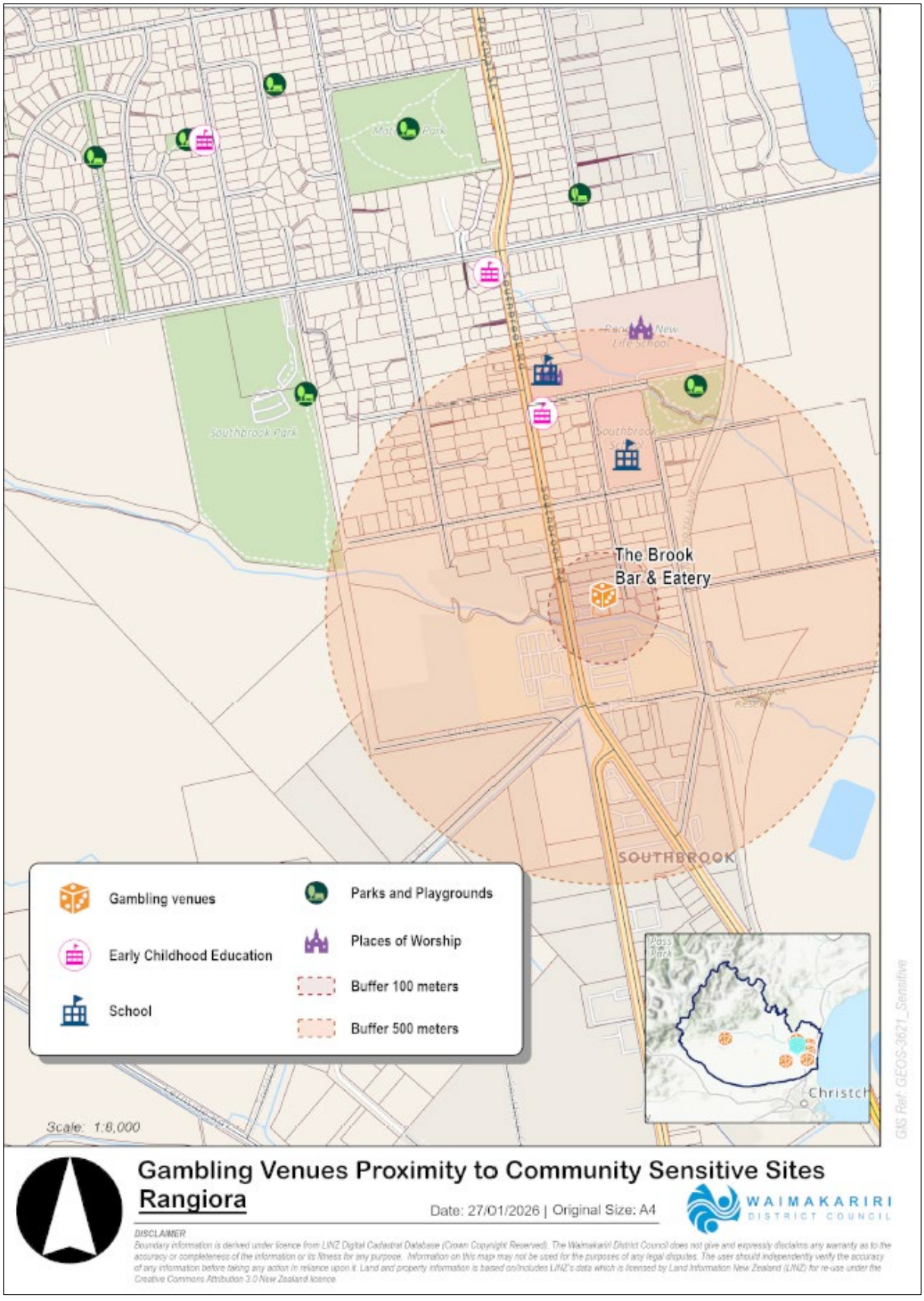
Scale: 1:8,000

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WAIMAKARIRI DISTRICT COUNCIL

GIS Ref: GEO05-3671_Sensitive

Class 4 gambling venues proximity to community sensitive sites in Rangiora



Class 4 gambling venues proximity to community sensitive sites in Woodend

