

Class 4 Gambling Venue and Board Venue Policy Review

Consultation 2021- Results as of 10 November

Feedback on the Class 4 Gambling Venue and Board Venue Policy Review (the Gambling Policy) has been received via email to haveyoursay@huttcity.govt.nz, directly to Wendy Moore, dropped off at the Council administration building, and via an online survey conducted to PublicVoice. The analysis below is concerned with the feedback received directly by email and by letter, and does not include survey results or demographic data from PublicVoice. All submissions received before the closing time of 5pm 10 November 2021 (excluding PublicVoice data and the Naenae Bowling Club feedback letters) have been noted in the Summary of Submissions spreadsheet in Council's record management system, available to view by select Council staff.

Number of submissions

64 submissions were received via email, and one submitter gave their feedback via a phone call. 5 people uploaded separate pieces of feedback on Council's website. There were 12 hard copies of the flyers returned. 244 letters were received in support of Naenae Bowling Club's submission favouring Option 2.

Stated preferred option

Option 1	28
Option 2	282
Option 3	10
Not stated	7

Sentiment and common themes

Support for Option 2

The majority of feedback received was in favour of Option 2 (status quo). 16 submitters sent in a signed template submission created by Pub Charity (discussed below separately). Others sent individual emails, with one submitter phoning in to discuss the process of submissions and the case for funding. 244 feedback letters were received in support of Naenae Bowling Club's submission favouring Option 2 (discussed below and included in Appendix 3). Several submitters who gave their feedback did not state which option they were in favour of and used the opportunity to express their perceptions on gambling harm.

Several submissions that supported Option 2 noted that their organisation was reliant on grant funding received via gambling proceeds. There was concern that removing this source of funding would penalise smaller community organisations who heavily rely on this source of funding to meet their basic costs.

Some noted that Class 4 gambling in a club venue was highly regulated, and therefore a significantly safer environment than online gambling, which is not under the same restrictions. There was a concern expressed by several submitters that removing the Class 4 machines from venues under Council jurisdiction would move gamblers to private venues located close by, or to online gambling.

The majority of submissions from smaller organisations and individuals were brief in their content, with others from larger organisations being significantly longer in content and detailing the reasons for which they supported Option 2. These included submissions from The Lions Foundation, Clubs NZ, The Gaming Machine Association of New Zealand, Naenae Bowling Club, The Four Winds Foundation, The New Zealand Community Trust, The One Foundation. All of these organisations were either recipients of grants from gambling funds or they represented venues or associations that owned or operated C4 gambling machines.

Those favouring Option 2 noted that the current Gambling Policy (2015) is that the status quo is working as intended to decrease the overall number of Class 4 gaming machines, with further points made about the funding structure of gambling proceeds and praising their positive outcomes in funding local community organisations.

Support for Options 1 and 3

Those in favour of Option 1 and Option 3 included individuals making independent submissions and larger organisations related to the provision of social services. The Problem Gambling Foundation, Mapu Maia, Asian Family Services, Regional Public Health, and The Salvation Army made prominent submissions supporting Option 1.

The theme of gambling harm was prominent in the submissions supporting Options 1 and / or 3. Many individuals referred to their own personal experiences seeing the harm that gambling has caused for family members.

Those supporting Options 1 and 3 noted that they perceived these potential actions to be in alignment with Council's objective of a wellbeing approach that would enable a thriving community.

Other sentiments

Some expressed concern that Council is able to make decisions about what some see as a private business decision which they should be free to make if similar rules apply under other territorial authorities that the Gambling Act permits.

Several submitters who were recipients of the grants raised by gambling proceeds noted that while they did not like the source of this funding, they did not see an available alternative to meet their operating costs.

Flyers

The flyers returned to Council were all in favour of either Option 1 or Option 3, with one preferring Option 2. Several recipients of the flyers noted that they decided to email instead to give a more substantial explanation of their views about gambling and the direction Council should take.

Mana Whenua

Mana Whenua stakeholders were invited to submit on the Gambling Policy by Wendy Moore. Respondents included the Te Aroha Hutt Valley Association (Wirangi Luke), Wellington Tenth Trust (Richard Te One), and Ngati Toa (Naomi Solomon). The sentiment of these submissions indicated a strong concern for the wellbeing of Te Awa Kairangi, and noted that Maori were disproportionately affected by the impacts of harmful gambling. Support was expressed for Option 1 in both cases as it was seen to be the most direct form of action Council had available. Ngati Toa noted that the wellbeing approach to gambling aligned with their Tu Te Ihi Problem Gambling Service recommendations from their current mahi. Wellington Tenth Trust urged Council to continue to gather valuable data in this subject for a robust analysis.

Pub Charity

Pub Charity CEO Martin Cheer distributed an email (Appendix 1) to recipients of Pub Charity funding calling for recipients to submit their views to Council. This email was accompanied by a template letter (Appendix 2) detailing support for Option 2, which recipients could individually sign and submit to haveyoursay@huttcity.govt.nz. It is unclear how many recipients received this email, but 16 signed letters have been received by Council via email (as of 10 November). The letter was in an editable format and recipients had the ability to add or remove text, however the majority kept the content the same as the original. Any substantial changes to the text were in keeping with the sentiment of the letter, supporting Option 2 but adding further information about why their organisation wanted to keep the current funding process.

Naenae Bowling Club

A collection of feedback letters was returned to Council on 10 November by Naenae Bowling Club. This document (Appendix 3) was 244 separate letters with identical content signed by individuals stating that they opposed the 'proposal to remove the 12 existing gaming machines from Naenae Bowling Club'. They did not specifically state that they supported Option 2, but that they were in support of the status quo keeping the gaming machines at Naenae Bowling Club. Because of this, they have been included in this analysis as a vote for Option 2. The individual letters were not included in the Summary of Submissions spreadsheet due to being received on the last day of submissions but were included in this analysis for context of option preference.

Snapshot of submissions (excluding PublicVoice and Naenae Bowling Club feedback letters)

Entity	Option chosen	Speaker at hearing	Notes
Boulcott's Farm Heritage Golf Club	2	No	Pub Charity list
Swimzone	Not stated	No	
Saints Women's Softball Club	3	No	
Clubs NZ	2	Yes	
Gaming Machine Association of New Zealand	2	Yes	
Petone Working Men's Club	2	No	
Four Winds Foundation	2	No	
Naenae Bowling Club	2	Yes	Speaking with Clubs NZ
Wellington Russian Club	2	No	Pub Charity list
Nexgen	2	No	Pub Charity list
Ngati Toa	1	No	
Hutt Valley Gymnastics	2	No	Pub Charity list
Normandale School	2	No	Pub Charity list
NZ Water Polo Association	2	No	Pub Charity list
Hutt Old Boys Marist RFC	2	No	Pub Charity list
Lower Hutt City Association Football and Sports Club Incorporated (LHCAFC)	2	No	Pub Charity list
The Lion Foundation	2	Yes	
Wellington Zoo Foundation	2	No	Pub Charity list
Life Education Trust	2	No	
Air Rescue Services Limited	2	No	
Sacred Heart School Petone	2	No	Pub Charity list
Swimming Wellington	2	No	Pub Charity list
Linda Hay	2	No	
Salvation Army	1	Yes	
Avalon Tennis Club	2	No	Pub Charity list
Silverstream Bowls and Petanque Club	2	No	Pub Charity list
Ruth Fyfe	3	No	Supports Option 3 at first, then Option 1 afterwards
Ross and Kathleen Caughley	3	No	
Cathy Downs	1	No	
Kamielle Tauaneai	1	No	
Sonali Bj	Not stated	No	
Samantha Clarke	Not stated	No	
Jodie Winterburn	1	No	
Fiona Beals	1	No	
Phillip Hall	3	No	
Paul Mc Nelis	Not stated	No	
Sarah Passmore	1	No	
Dallas Serj	3	No	
Anonymous	3	No	Flyer #1
Anonymous	1	No	Flyer #2
Anonymous	3	No	Flyer #3

Anonymous	1	No	Flyer #4
C Dransfield	1	No	Flyer #5
Dawn McKinley	1	No	
Melanie Roy	Not stated	No	
Craig Twort	Not stated	No	
Regional Public Health	1	No	
Kamala McLeod	2	No	
Irene Galuszka	Not stated	No	
Te Aroha Hutt Valley Association	1	No	
Janette Gwilliam	3	No	
Andrea Hilton	1	Yes	
Lydia Hamer	1	No	
Tim Herbert	1	No	
Anonymous	1	No	Flyer #6
Wellington Rugby Football Union	2	No	
Asian Family Services	1	No	
Cricket Wellington	2	Yes	
Taita District Cricket Club	2	No	
One Foundation	2	No	
Nuku Ora	2	Yes	
Capital Football	2	Yes	
Cricket Wellington	2	Yes	
Greater Wellington Sport Leaders Forum	2	Yes	
TAB New Zealand	2	Yes	
Problem Gambling Foundation	1	Yes	
Anonymous	3	No	Flyer #7
New Zealand Community Trust	2	Yes	
Mapu Maia	1	No	
Wellington Hockey	2	Yes	
Wellington Tenth's Trust	1	No	
Hutt Valley Tennis	2	Yes	
Chris Ferguson	1	No	
Martin de Jong	1	No	
Ryan Kennedy	1	No	
Anonymous	1	No	Flyer #8
Anonymous	2	No	Flyer #9
Anonymous	1	No	Flyer #10
Anonymous	1	No	Flyer #11
Anonymous	1	No	Flyer #12

Appendix 1: Pub Charity email

From: PC Donations <donations@pubcharitylimited.org.nz>

Date: 22 October 2021 at 4:23:16 PM NZDT

Subject: FW: Hutt City Council Review of Class 4 Gambling Policy



Dear Pub Charity Donation Recipient

RE: HCC Review of Class 4 Gambling Policy

The Hutt City Council has called for community submissions on several options for their policy that dictates the future approach to the gaming venues that Pub Charity and other corporate societies operate to raise funds to benefit Hutt City.

You are receiving this as sometime in the last 2 years were the contact person for an organisation that successfully applied to Pub Charity for funding.

Hutt City Council staff are clearly pushing for a policy that would reduce the amount raised for community groups. Typically, Councils see this as a debate between those who operate gaming machines, like Pub Charity, and those who oppose gaming machines in the community.

Almost never are the interests of those who play the machines, those that are employed or own the business that hosts the machines asked for, and rarely do the community groups that receive the proceeds get approached for their views.

I am writing to simply encourage you to participate in the consultation process. You can write on behalf of your organisation or personally and I would encourage you to get your members involved too. You may also attend the eventual hearing in person and talk to your submissions if you want to.

I have attached a template for ease of use however I am very conscious that you only use that form if you agree with the views written on it.

One thing is for certain Councillors listen to the locals who vote them into power (most of the time) and they need to hear from you one way or the other.

Time is short and I apologise for that. Submissions by email at haveyoursay@huttcity.govt.nz must be received by 5pm on Wednesday the 3rd of November 2021.

Yours sincerely

A handwritten signature in black ink, appearing to read "M Cheer", written in a cursive style.

Martin Cheer
Chief Executive
Pub Charity Limited

Appendix 2: Pub Charity letter

Class 4 Gaming Venue Policy Review

Hutt City Council

By email: haveyoursay@huttcity.govt.nz

We support option 2, the status quo policy.

The current policy allows gaming machine activity and gaming machine funding to continue at current levels. A more restrictive policy would phase out gaming machine funding over time. The current policy is appropriate because:

- The local gaming machines generate significant funding for local community and sporting organisations (over \$5.2m each year).
- The gaming machine funding enables local community and sporting organisations to provide a wider range of services and facilities.
- A very large number of community and sporting organisations are reliant on gaming machine funding to fund core business activities.
- Without gaming machine funding, community and sporting organisations would have to reduce the number of events and activities they offer.
- As gaming machine funding reduces, the cost to participate in community and sporting activities would have to increase. This would reduce participation rates.
- It is unrealistic to think that the gaming machine funding can be replaced by other funding such as commercial sponsorship. Commercial sponsorship is extremely hard to obtain at the best of times, and when it is obtained, the amount is modest compared to the gaming funding available. In the current uncertain Covid-19 times, commercial sponsorship is almost impossible to obtain.

We do/do not wish to speak at the oral hearing.

Signed:

Organisation Name:

Name:

Phone or email:

Appendix 3

Gambling Venue Policy Submission - Proposal to Remove the 12 Existing Gaming Machines from Naenae Bowling Club

I strongly oppose Council's proposal to remove the Naenae Bowling Club's 12 gaming machines, for the following reasons:

- The club has operated gaming machines responsibly for over 20 years.
- The gaming machines provide a vital revenue source for the club. The machines help the club to meet the significant costs associated with maintaining and operating the world-class facility. If the gaming machines were to be removed by Council, this would cause significant financial pressure for the club.
- The removal of existing use rights is unprecedented, grossly unfair, and totally undermines the considerable planning and budgeting made by the club when deciding to move to the current location.
- The proposal unfairly targets and singles out the Naenae Bowling Club. None of the other 29 gaming machine venues in Hutt City will be required by Council to remove their gaming machines.
- Removal of the club's gaming machines will do nothing to help reduce problem gambling. Any problem gamblers who may have used the club's machines will simply move and play one of the other 426 gaming machines located in Hutt City, or worse, gamble online.
- Moving the gambling spend away from a club environment to a commercial pub environment is likely to increase the risk of gambling harm, as clubs provide a safer environment in which to participate in gaming machine gambling than pubs.
- One hundred percent of the profits from the club's gaming machines remain within Hutt City (they are used by the club to maintain and improve the club). If the spend moved to the gaming machines located in the nearby commercial venues, then only around 16% of the machine proceeds would be returned to Hutt City in grants.

Signed
Date
Name
Phone

*I do not wish to make a
separate oral presentation
at the upcoming Council
hearing (the club will make
an oral presentation*

