

Gambling and TAB Venues Policy Review Issues and Options Paper

1. Introduction

- 1.1 Christchurch City Council (the Council) is currently reviewing its Gambling and TAB Venues Policy.
- 1.2 This Issues and Options Paper has been drafted by Council staff to support the Council's decision making on the next steps for the policy review.

2. Scope

- 2.1 A council's role in class 4 and TAB gambling is limited. An applicant for a new venue must first get council venue consent which is considered using the council's policy.
- 2.2 Under the Gambling Act 2003, councils are required to have a policy on class 4 (pokie) venues. The policy must specify whether (and where) new venues can be established. The policy may specify any restriction on maximum numbers of machines and include a relocation provision. Councils cannot force existing venues to close or relocate.
- 2.3 Under the Racing Industry Act 2020, councils are required to have a policy on standalone TAB venues. Kiosk, pub, and online TAB are outside the scope of this policy. The policy must specify whether (and where) new venues can be established.

3. Current State

- 3.1 The Council's Gambling and TAB Venues Policy is a combined policy document. The current policy provisions have been in place since 2004. The purpose of the policy is to control the growth of gambling, prevent and minimise gambling harm, and facilitate community involvement in decisions about the provision of gambling.
- 3.2 The Council takes a 'sinking lid' approach to new pokie venues and machines, meaning the Council will not grant consent for new pokie venues to establish. The Council does not allow existing venues to relocate. If a venue closes, another venue cannot be established which reduces pokie machine numbers over time.
- 3.3 The Council allows two or more clubs to merge with a total of 18 machines.
- 3.4 The policy allows new TAB venues to establish, subject to statutory and District Plan requirements.
- 3.5 The policy was last reviewed and retained without amendment by the Council in October 2024. The Council resolved for the policy to be reviewed within two years and for a special consultative procedure (SCP) to be undertaken.
- 3.6 At the 13 May 2026, Policy and Planning Committee meeting, the Committee directed staff to undertake early engagement and complete an issues and options analysis.

4. Identifying Policy Issues

- 4.1 Council staff have collected data and academic research on gambling in Christchurch and undertook early engagement with the community and stakeholders on current policy settings. From this work, staff have identified the following policy issues.

There are associations between gambling availability, access, and harm

4.2 Research reported that the **most common factor in gambling harm by pokies was easy accessibility and high availability particularly in areas with high levels of deprivation**, which is often where machines are more densely located¹.

4.2.1 Māori and Pacific people are disproportionality affected by gambling harm².

Māori account for approximately 17.8 percent of the total New Zealand population but make up 30 percent of individuals seeking help for their gambling, and Pacific people account for 8.9 percent of the total population while making up 16.7 percent of individuals seeking help for their gambling³.

4.3 Research has indicated that **continuous forms of gambling (such as electronic gambling machines (EGMs)) are more addictive and more likely to be associated with gambling harm, compared to other forms of gambling⁴**. EGMs are designed to keep gamblers playing with features such as high frequency rewards, free spins and ‘losses disguised as wins’, where losing on gambling machines is celebrated in a way similar to winning through music or animation⁵. In Christchurch, **43% of all clients seeking problem gambling services in 2024/25 reported that pokies were their primary mode of gambling⁶**.

Christchurch has more pokie machines per venue and population, and more people seeking assistance for problem gambling than the national average

4.4 **Pokie machine and venue numbers in Christchurch are continuing to decline, but at a slow rate**. During the time the sinking lid has been in place, machine numbers have decreased from 2,183 to 1,228 and venue numbers have decreased from 159 to 74⁷.

¹ Rimal, R., Shepherd, R-M., Curley, L. E., & Sundram, F., 2023. *Perspectives from gambling expert stakeholders in relation to electronic gaming machines in New Zealand*. Health Policy, 136.

² Bellringer, M. E., Janicot, S., Ikeda, T., Lowe, G., Garrett, N., & Abbott, M., 2020. *New Zealand National Gambling Study: Correspondence between changes in gambling and gambling risk levels and health, quality of life, and health and social inequities*. NGS series report number 9. Auckland: Auckland University of Technology, Gambling and Addictions Research Centre.

³ Ministry of Health, 2024. *Intervention Client Data, by Client Type* [online]. Retrieved from: <https://www.health.govt.nz/monitoring-statistics/statistics-and-data-sets/gambling-harm/gambling-harm-services-data>. Statistics New Zealand, 2023. *2023 Census population counts (by ethnic group, age, and Māori descent) and dwelling counts*. [online]. Retrieved from: <https://www.stats.govt.nz/information-releases/2023-census-population-counts-by-ethnic-group-age-and-maori-descent-and-dwelling-counts/>

⁴ Myles, D., Bennett, D., Carter, A., Yücel, M., Albertella, L., de Lacy-Vawdon, C., Livingstone, C., 2023. “Losses disguised as wins” in electronic gambling machines contribute to win overestimation in a large online sample. *Addictive Behaviors Reports*, 18.

⁵ Myles, D., Bennett, D., Carter, A., Yücel, M., Albertella, L., de Lacy-Vawdon, C., Livingstone, C., 2023. “Losses disguised as wins” in electronic gambling machines contribute to win overestimation in a large online sample. *Addictive Behaviors Reports*, 18.

⁶ Health New Zealand, 2026. *Clients assisted, by primary problem gambling mode, for Christchurch for 2024/25 excluding brief interventions*. Email communication received 23 July 2026.

⁷ Department of Internal Affairs, 2021. *Gaming Machine Venues, Numbers and Expenditure: Summary of Venue and Numbers by Territorial Authority/District* [online]. Retrieved from: <https://www.dia.govt.nz/gambling-statistics-expenditure>. Department of Internal Affairs, 2025. *Gaming machine profits (GMP dashboard)* [online]. Retrieved from: <https://catalogue.data.govt.nz/dataset/gaming-machine-profits-gmp-dashboard>

4.5 Christchurch has more pokie machines per venue and more machines per head of population than the national average. In 2025 the average number of machines per venue in the district was 16.5 which is higher than the national average of 14.3⁸. Christchurch has 2.9 machines per 1000 residents, which is higher than the national average of 2.6⁹.

4.6 Pokie venues and machines in Christchurch are disproportionately concentrated in areas of high deprivation, although this is trending downwards. As of December 2025, there were 74 venues in the Christchurch district, with 33 of these located in areas with a deprivation score of 7 or higher (44% of venues)¹⁰. The gaming machine profits for venues located in areas with a deprivation score of 8 and 9 in 2025 was \$37.6 million (with the total gambling losses in the district being \$99.7 million)¹¹.

4.7 Gambling machine profits, or money lost by gamblers, has been rising in Christchurch despite a slow reduction in machine numbers. In 2015 there were 1,353 pokie machines in the district, with that number reducing to 1,228 in 2025¹². Despite this, gambling losses from pokie machines in Christchurch has risen from \$78.5 million in 2015, to \$99.7 million in 2025¹³.

4.8 Christchurch continues to have higher per capita rates of people seeking assistance for problem gambling, compared to national averages. Between July 2022 and 2023, 253 new clients accessed problem gambling intervention services in Christchurch, which equates to 6.4 clients per capita (10,000 residents)¹⁴. This is higher than the national average where 2,171 clients sought support for the first time (4.2 clients per capita). Fewer machines may not result in fewer gambling losses but may result in lower levels of harm.

There is appetite for easing pokie restrictions from corporate societies, community and sporting groups, and some of the community

4.9 In May-June 2026 the Council undertook early engagement with the community and stakeholders on the current class 4 policy settings. Responses were received from 114 individuals, corporate societies, health services, and community and sporting groups.

⁸ Department of Internal Affairs, 2025. *Gaming machine profits (GMP dashboard)* [online]. Retrieved from: <https://catalogue.data.govt.nz/dataset/gaming-machine-profits-gmp-dashboard>.

⁹ Department of Internal Affairs, 2025. *Gaming machine profits (GMP dashboard)* [online]. Retrieved from: <https://catalogue.data.govt.nz/dataset/gaming-machine-profits-gmp-dashboard>. Statistics New Zealand, 2025. *Subnational population estimates: At 30 June 2025* [online]. Retrieved from: <https://www.stats.govt.nz/information-releases/subnational-population-estimates-at-30-june-2025/>

¹⁰ Department of Internal Affairs, 2025. *Gaming machine profits (GMP dashboard)* [online]. Retrieved from: <https://catalogue.data.govt.nz/dataset/gaming-machine-profits-gmp-dashboard>.

¹¹ Department of Internal Affairs, 2026. *Christchurch City (incl. Banks Peninsula Ward) Venue GMP and Deprivation Ratings 2025*. Email communication received 23 February 2026.

¹² Department of Internal Affairs, 2025. *Gaming machine profits (GMP dashboard)* [online]. Retrieved from: <https://catalogue.data.govt.nz/dataset/gaming-machine-profits-gmp-dashboard>.

¹³ Department of Internal Affairs, 2025. *Gaming machine profits (GMP dashboard)* [online]. Retrieved from: <https://catalogue.data.govt.nz/dataset/gaming-machine-profits-gmp-dashboard>.

¹⁴ Ministry of Health, 2024. *Intervention Client Data, by Client Type* [online]. Retrieved from: <https://www.health.govt.nz/monitoring-statistics/statistics-and-data-sets/gambling-harm/gambling-harm-services-data>.

4.10 Many respondents preferred another type of restriction (such as a cap) to a sinking lid and indicated support for allowing existing venue relocations. Many respondents did however provide the opinion that any relocation policy should have restrictions on venue proximity to sensitive sites, high deprivation areas and other venues.

4.11 **Some community and sporting groups expressed concern that the current policy settings could impact the grant funding they receive from corporate societies.** In 2019, the total gaming machine profits (GMP) in Christchurch was \$77,026,366 and \$18,679,125 in class 4 gaming grants¹⁵ was distributed to organisations in the Christchurch district¹⁶. In 2025, the total GMP was \$99,735,684 and \$26,869,417 in community grants was distributed¹⁷.

TAB venue numbers are not increasing despite a permissive policy.

4.12 **Whilst the policy allows for new TAB venues in the district, the number of venues has reduced rather than increased.** There are three venues in the district which is down from ten in 2004.

4.12.1 TAB New Zealand appear to be focused on their outlets in pubs and kiosks along with online gambling to reach their customers.

4.12.2 **Race and sports betting also have a low prevalence of being the preferred method of gambling for problem gamblers.** TAB New Zealand gambling was reported as the primary mode of gambling for 8% of all clients seeking problem gambling services in 2024/25 (compared to 43% for pokies)¹⁸.

5. Identifying and Assessing Policy Options

5.1 The following policy options have been assessed using the Council's policy purpose and the issues identified in this paper.

Policy purpose

5.1.1 Control the growth of gambling

5.1.2 Prevent and minimise gambling harm

5.1.3 Facilitate community involvement in decisions about the provision of gambling

¹⁵ Under the Gambling Act 40% of class 5 gaming machine profits is required to be returned to the community through grants.

¹⁶ Department of Internal Affairs, 2025. *Pokie Grants Overview*. Granted. Retrieved from: <https://granted.govt.nz/dashboard>. Department of Internal Affairs, 2025. *Gaming machine profits (GMP dashboard)* [online]. Retrieved from: <https://catalogue.data.govt.nz/dataset/gaming-machine-profits-gmp-dashboard>.

¹⁷ It is important to note that it is difficult to identify an accurate figure for pokie grants being allocated to Christchurch community organisations. This is because Christchurch may benefit from grants made to national and regional groups based outside the district, but that level of benefit is impossible to tell from reporting.

¹⁸ Health New Zealand, 2026. *Clients assisted, by primary problem gambling mode, for Christchurch for 2024/25 excluding brief interventions*. Email communication received 23 July 2026.

Policy issues

- 5.1.4 There are associations between gambling availability, access, and harm.
- 5.1.5 Christchurch has more pokie machines per venue and population, and more people seeking assistance for problem gambling than the national average.
- 5.1.6 There is appetite for easing pokie restrictions from corporate societies, community and sporting groups, and some of the community.
- 5.1.7 TAB venue numbers are not increasing despite a permissive policy.

Class 4 Gambling Venues

5.2 Sinking lid (current approach): A sinking lid policy seeks to reduce the number of venues through attrition. No new venue consents are granted and if an existing venue ceases to operate, no new venue can apply for consent to replace it.

- 5.2.1 The rationale behind a sinking lid policy is that reducing the number of venues and gaming machines over time will increasingly restrict accessibility to gambling venues which will help reduce problem gambling and the harm caused by problem gambling. The policy has the same application for all venues and all areas in the district.
- 5.2.2 Under the Gambling Act, corporate societies who are granted a licence after 17 October 2001 are limited to 9 machines, while venues licenced before this date could have up to 18. Given the Council has not allowed new venues since the policy was first adopted in 2004, most of the venues in the district are allowed up to 18 machines. If the Council allowed new venues, they would only be allowed to have up to nine machines. A sinking lid essentially bakes in a higher machine venue ratio.
- 5.2.3 There is some support to maintain the sinking lid, particularly from health and social service providers, and some of the community.

5.3 Cap on total venue or machine numbers: This policy option would place a limit on the number of gaming venues and/or number of machines in Christchurch. The Council could only issue a new venue consent if there is space within the cap.

- 5.3.1 Depending on where the cap is set, it could:
 - 5.3.1.1 allow some growth in venues and/or machines if the cap was higher than existing numbers of venues/machines;
 - 5.3.1.2 set current levels as the maximum and prohibit any further growth, which would enable new venues to open only when an existing venue closes, or;
 - 5.3.1.3 set a cap lower than current numbers and consent would not be granted for a new licence until the numbers fall below the cap set.
- 5.3.2 A cap on total machine and/or venue numbers could also, in effect, enable a transfer provision. Depending on how the policy provisions were structured,

corporate societies could move from one venue to another if the cap limit had not been reached. However, because it would be considered a new licence, a new venue would only be able to have nine machines.

- 5.3.3 There is some support to move away from a sinking lid, particularly from corporate societies, community and sporting groups, and some individuals in the community.

Cap on current venue numbers

- 5.3.4 The cap could be set at current venue numbers, setting a policy position that there are enough venues in the district and the Council does not want any more. This would prevent growth in gambling venue numbers. There is however less ability to reduce harm as access to gambling is not reduced unless restrictions are placed on where these venues can establish (distance from sensitive sites and high deprivation areas).

Cap lower than current venue numbers

- 5.3.5 A cap set lower than current venue numbers would act as a sinking lid until venue numbers get to the cap. Noting venue numbers are currently reducing at a slow rate, depending on where the cap is set it may not be reached for some time.
- 5.3.6 This option controls the growth of gambling as it sets the policy position that venue numbers are too high and new venues can only establish once venues numbers are reduced to below where the cap is set. As a result, this option has the effect of preventing and minimising gambling harm, as reducing gambling access could reduce gambling harm.

Cap higher than current venue numbers

- 5.3.7 A cap set higher than current venue numbers would allow new venues to establish to fill the gap between current venue numbers and the cap. This would set the policy position that there could be some growth in gambling in the district.
- 5.3.8 This option only controls the growth of gambling once the cap is met. In the meantime, gambling availability and access can increase which could result in increased gambling harm.

Cap on machine numbers

- 5.3.9 Alternatively, the cap could be on current machine numbers. This could however result in one venue with 18 machines closing, and two venues being able to establish with nine machines each. This would prevent the growth in machine numbers but may increase venue numbers.

5.4 Relocation: A relocation provision enables a corporate society to move their pokie machines to a new location and retain the conditions of its existing venue consent, within the parameters of the Gambling Act¹⁹ and the Council's policy.

5.4.1 A relocation provision can also include restrictions on the circumstances under which a relocation would be consented. These may be applied to manage venue concentration in certain areas or keep pokies within the same area as the existing venue (to avoid moving harm elsewhere). These could include:

5.4.1.1 Restrictions on relocated venue proximity to sensitive sites (primary and secondary schools and addiction and rehabilitation facilities)²⁰.

5.4.1.2 Restricting relocations in high deprivation areas (levels 8-10 as defined by the New Zealand Deprivation Index)²¹.

5.4.1.3 Restricting the distance the proposed relocated venue is from the existing venue.

5.4.2 There is support for a relocation provision to have restrictions around where existing venues can relocate to, particularly from corporate societies, community and sporting groups, and some individuals in the community.

Sensitive site and/or deprivation restrictions

5.4.3 Allowing existing pokie venues to relocate with restrictions on the new venue's proximity to sensitive sites (schools and addiction and rehabilitation services) and/or high deprivation areas would allow the Council to focus on gambling harm reduction in specific communities and areas of the district.

5.4.3.1 It would still control the growth of gambling but at a slower rate than the current sinking lid. It prioritises reducing gambling harm for vulnerable communities over reducing access more broadly.

5.4.3.2 However, councils cannot force a venue to relocate out of a high deprivation community - the provision would just give licence holders the mechanism to do so.

¹⁹ Under the Gambling Act, corporate societies who are granted a licence after 17 October 2001 are limited to 9 machines.

²⁰ This is intended to align with definition of sensitive sites in the Council's Local Alcohol Policy - <https://ccc.govt.nz/the-council/plans-strategies-policies-and-bylaws/policies/health-policies/local-alcohol-policy>

²¹ This is intended to align with definition of sensitive sites in the Council's Local Alcohol Policy - <https://ccc.govt.nz/the-council/plans-strategies-policies-and-bylaws/policies/health-policies/local-alcohol-policy>

Distance from existing venue

5.4.4 Allowing existing venues to relocate close by if the new venue will be regarded as the same venue intends to provide an option for existing venues to maintain their business at another location²².

5.4.4.1 It would still control the growth of gambling but at a slower rate than the current sinking lid. There is some ability for this option to prevent and minimise harm as the relocation can only occur within the same area – harm is not being transferred to another community.

5.4.4.2 However, if the existing venue is in an area of high deprivation and/or near a sensitive site, this option would keep the venue in that area. This would not minimise harm for vulnerable communities.

No restrictions on venue relocations

5.4.5 Allowing existing venues to relocate without restrictions is a blanket approach as it is not targeted to reducing harm in specific areas or communities in the district.

5.4.5.1 It would limit the effectiveness of a sinking lid policy as a venue that would normally close under the current policy settings, would be able to relocate and stay open. Without restrictions on where venues can relocate to, this policy option does not prevent or minimise gambling harm.

5.4.5.2 There is some support for a relocation provision without restrictions, particularly from corporate societies, community and sporting groups, and some of the community.

5.5 Allow clubs to merge (current approach): The Council will grant consent for two clubs to merge. The total number of machines that may operate at the venue must not exceed 18 machines.

5.5.1 This policy option has the potential to control the growth of gambling and subsequently prevent and minimise gambling harm by reducing access to pokies in clubs.

5.5.2 Some health and social service agencies have previously advocated for the policy to prohibit mergers.

5.5.3 No clubs have merged in the district since the policy was introduced. Given this, staff expect any changes to the Council's policy on mergers would have a minimal impact on the number of machines and venues in Christchurch.

²² This is intended to align with the Waikiwi precedent that allowed limited scope for venues to relocate during 2013 and 2024 - *ILT Foundation v The Secretary for Internal Affairs* [2013] NZHC 1330 [6 June 2013], *Feed Families Not Pokies Aotearoa Incorporated v Secretary for Internal Affairs* [2024] NZHC 217.

5.5.4 There are only six clubs in Christchurch, all of which are licensed to have 18 machines, so allowing two clubs to merge could reduce the number of pokie machines in the district by up to 18 machines.

5.5.4.1 Decreasing the maximum number of machines at a merged venue is likely to disincentivise clubs from merging. Increasing the maximum number of machines would allow merged clubs to have more machines than other pokie venues. The current approach appears set at that would least disincentivise mergers and could help to control the growth of gambling.

5.6 No specific policy restrictions: A permissive policy with no restrictions beyond the provisions of the Gambling Act 2003 and the Council's District Plan would allow pokie venues to be established anywhere within the district, and to operate the maximum number of machines permitted under the Act²³.

5.6.1 There is support to move away from a sinking lid, particularly from corporate societies, community and sporting groups, and some individuals in the community.

5.6.2 This option would allow for growth in gambling in the district which could result in increased gambling availability and access. Increased gambling access could result in increased gambling harm. This option therefore does not prevent and minimise gambling harm or control the growth of gambling.

TAB Venues

5.7 No specific policy restrictions (current approach): TAB venues can establish in the district subject to statutory and District Plan requirements. Since the policy was introduced, there has not been an increase in TAB venues.

5.7.1 Some health and social service agencies have previously advocated for the policy to have a sinking lid on TAB venues.

5.7.2 TAB venues have not become more available or accessible despite a permissive policy so a sinking lid or cap on TAB venues would have minimal impact.

5.7.3 Race and sports betting have a low prevalence of being the preferred method of gambling for problem gamblers.

²³ Under the Gambling Act, corporate societies who are granted a licence after 17 October 2001 are limited to 9 machines.