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Queensland Greens Member for Maiwar



DRAFT

Ms Ruth Timaloa, Licensing Officer
Office of Liquor and Gaming Regulation
Department of Justice and Attorney-General
Locked Bag 180
CITY EAST QLD 4002

By email: OLGRlicensing@justice.qld.gov.au

Objection to application for 45 pokies at Pig n Whistle Indooroopilly

Ref# 966498/LAB06

Dear Ms Timaloa,

I am writing to voice my objection and the objections of many of my constituents to the application for 45 poker machines at the Pig n Whistle Indooroopilly (**the Application**).

I wish to communicate my view in the strongest possible terms: any proposal for poker machines at the Pig n Whistle Indooroopilly, especially this application for 45 machines, is deeply inappropriate. I strongly urge you to reject this application. The appropriate number of poker machines for the Pig n Whistle is zero.

Community opposition

My role as Member of the Legislative Assembly is to represent the people of Maiwar, which encompasses Indooroopilly and surrounding suburbs.

Hundreds of constituents have contacted me in the short time since the application was made public, and their feedback has been universally opposed to this application.

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In particular, many constituents have told me that they do not want to raise their kids so close to a venue with poker machines. The Indooroopilly Shopping Centre is an absolutely central part of the everyday lives of thousands of people in this area. Many have told me they don't want to see the Centre turned into a pokie-focussed place.

There has already been significant interest in building a community-based campaign to stop this application. Over 50 people attended an information forum at the Indooroopilly Uniting Church on 5 June 2018 to express their opposition.

Gambling Sensitive Sites

As identified in the Community Impact Statement (**CIS**), the Pig n Whistle is located near a large number of Gambling Sensitive Sites (**GSS**) including sites in *six out of a possible nine categories*. Below are some further details in relation to some of these sites.

Indooroopilly Shopping Centre and bus interchange

Shopping centres are listed in [Guideline G02 - Gaming Community Impact Statement \(the Guideline\)](#) as a GSS, but, staggeringly, the CIS fails to mention Indooroopilly Shopping Centre (**the Centre**). This is despite the fact that the Pig n Whistle is located physically inside the Centre at its outer edge. The Pig n Whistle owners lease their premises directly from the Centre. The venue opens directly into the Centre at multiple points, as well as opening directly onto the footpath directly outside.

The Centre is at the heart of commercial life in Indooroopilly. It includes major supermarkets and and receives many thousands of visitors per week.

Significantly, the Centre is heavily focussed on being family friendly. [The Centre provides:](#)

- Free childcare every Thursday from 10am - 1pm,
- Free children's story time on Wednesdays
- Free children's disco monthly
- A kids playground,
- Parking for prams, and
- Five "parents rooms" alongside the usual amenities.

It is guaranteed that many families with children will pass by the venue on a daily basis.

Despite the above list of childcare and other related facilities, the CIS notes at page 21 that *“the premises do not currently, nor intend to provide any child care facilities.”* This claim is incomplete at best and deliberately misleading at worst.

The Centre is attached to the major bus interchange servicing Brisbane’s western suburbs. Almost every major bus route from the CBD passes through this interchange, which is located less than 20 metres from the Pig n Whistle.

The Pig n Whistle is also immediately adjacent to the Indooroopilly Shopping Centre food court and the entrance to the Event cinemas, both of which are frequented by a large number of school students throughout the school term and during school holidays.

Schools and childcare centres

As noted in the CIS, the Pig n Whistle is located near thirteen schools and childcare centres. In my engagement with some of these schools and centres, I have received overwhelmingly negative feedback about the proposed 45 pokies.

Other sites

It is noted in the CIS on page 24 that *“Several sites are situated within reasonable proximity to the premises. However, these sites are sufficiently separated by distance to prevent any interface.”*

This statement is both confusing and misleading. For instance, the Indooroopilly Family Practice and Indooroopilly Uniting Church are both directly across the road from the Pig n Whistle.

Without evidence, commissioner should not place any weight on the applicant’s claim that there will not be any “interface” between GSSs and the venue.

Responding to the Community Impact Statement

After reviewing the CIS I am deeply disappointed in the applicant’s biased and self-serving assessments. Below are some examples which each point to broader arguments against approving this application.

“Consultation”

The applicant and their consultant have almost totally failed to engage in any meaningful consultation and have fallen far short of the very basic requirements in the Guideline.

In summary, the applicant made a phone call and sent an email and online survey to a list of six organisations including my office. There was no face-to-face engagement.

Two out of six organisations responded - mine and one other. The other was completely unintelligible. My response was strongly opposed.

The Guideline requires evidence to give *“an indication of the attitude of the community toward the application”*. On the basis of their consultation, the only conclusion open to the applicant on the basis of their consultation is that the community is opposed.

Under the Guideline, it is expected that the researcher will contact organisations “such as” those named in the table below. I have indicated next below whether the applicant contacted any organisations in that category.

<i>Suggested organisations for consultation</i>	
The nearest “Gambling Help” service provider.	No. Relationships Australia is listed as the nearest provider , but the applicant did not contact them.
Local community help groups, welfare and emergency relief providers	Yes.
Financial assistance counselling services	Yes.
Health care providers	No. The Indooroopilly General Practice and the Indooroopilly Family Practice are both located within the shopping centre or directly across the road.
Business and industry associations	Yes.
Community leaders	Yes - myself and Cr Julian Simmons only.

Cultural groups	No.
Local community groups	Yes. The Uniting Church.
Local residential groups	No.

The Guideline also requires evidence to give *“an indication of the prevalence of problem gambling in the community.”* No direct evidence of this is provided.

Business and Industry

The CIS claims that *“most of the businesses [in the local area] would benefit from an approval of the application due to the additional commerce attracted to the locality. The economic impact upon all of the businesses within the LCA would either be positive, or negligible.”*

The applicant provides exactly no evidence for this claim. This is despite the fact that money spent on poker machines cannot be spent in other local businesses.

Tourism

The applicant appears to claim that 45 extra pokies will bring in extra tourism, either to Brisbane or to Indooroopilly, but provides no evidence for that claim aside from pointing out that the tourism industry is significant.

In particular, no evidence is cited to support the claim that extra poker machines in an area makes it an *“improved destination”* for tourists. Entertainment industry figures occasionally make the claim that large casino / resort complexes encourage tourism, but the claim that small suburban hotels do so is not supported by any evidence that I am aware of.

Socio-economic impacts

The CIS notes that there are currently just 40 poker machines in Indooroopilly. I note that this application would more than double the number of poker machines in the area.

Overall, the CIS fails to respond to the requirements in the Guideline for quantitative economic analysis. Instead of giving numbers (for instance, of extra jobs created or expected donations) the applicant makes general statements.

The applicant is clearly expecting to extract extra revenue out of the local community. They predict at page 27 that pokies revenue will be *"in line with, or slightly above published averages due to the currently low number and density of gaming machines within the Local Area."* They also suggest on page 26 that the application would *"assist in meeting perceived demand within the Local Area."*

Despite this expectation, the applicant does not acknowledge that local residents are likely to lose significant amounts of money using the poker machines, or any possibility that the amount of gambling losses in the community will rise. In fact, they claim at page 26 that *"it is unlikely that this application would cause any additional impact on the Local Area"* and on page 27 that *"it is unlikely that businesses within the area would suffer financially or through any other means..."*

Alleged benefits

The applicant does not provide any examples of benefits to the community aside from unquantified promises of *"sponsorships, donations, and permitting the use of the premises facilities for use by community groups at no cost."*

The only jobs expected to be created are those to *"monitor and control gaming activities"*.

Conclusion

To reiterate, I strongly urge you to reject this application. The appropriate number of poker machines for the Pig n Whistle is zero.

If you require further information from me or my office about this matter, please do not hesitate to contact us at maiwar@parliament.qld.gov.au or on 3737 4100.

Kind regards,

Michael Berkman MP