

**DECISION UNDER DELEGATED AUTHORITY ON AN APPLICATION
BY CHRISTCHURCH CASINOS LIMITED FOR APPROVAL OF A CONSTRUCTION AND
DESIGN CHANGE AT THE CHRISTCHURCH CASINO**

Date of Decision: 22 October 2026

1. On 12 October 2026, Christchurch Casinos Limited (“**CCL**”) applied, pursuant to conditions 6 and 7 of its venue licence, for approval of a construction and design change at the Christchurch casino. CCL applied to construct a new Count Room at the Christchurch casino.

2. Conditions 6 and 7 of CCL’s venue licence provide as follows:

6. Subject to the provisions of condition 7, the Licence Holder must obtain the approval of the Commission prior to:

- (a) any construction or design changes whatsoever in the Gambling Area (Schedules 1 and 2) and Additional Gambling Area (Schedule 3) and for any construction or design changes elsewhere in the Casino Venue which may impact on the matters set out in condition 7;
- (b) the construction or relocation outside the Gambling Area and Additional Gambling Areas and within the Casino Venue of bank facilities available to the public excluding ATMs, EFTPOS and like devices; and
- (c) the addition or alteration of signage relating to the casino business on the exterior of the Casino Venue or on or around the building within which it is located.

The process by which the Licence Holder may obtain approval for construction or design changes to Level 1, Level 2 and the rooftop area of the Casino Venue, (paragraph (a) above) is set out in condition 7. The Commission will determine any application for approval under 6(b). The Executive Director may approve the addition or alteration of signage relating to the casino business on the exterior of the Casino Venue or on or around the building within which it is located (paragraph (c) above) if he/she is satisfied the proposed changes will have no potentially adverse effects. If he/she is not so satisfied, the proposed changes must be referred to the Commission for a decision on approval.

7. The Licence Holder must notify the Executive Director of any proposed changes to the construction or design for which approval is required under condition 6. Notification must be accompanied by relevant drawings and an assessment of any impacts the alterations may have on:

- (a) the integrity and fairness of games;
- (b) the effectiveness of security and surveillance;
- (c) harm prevention, harm minimisation and responsible gambling;
- (d) potential access to the Gambling Area by persons under 20 years of age; and
- (e) compliance by any person with the Act, including section 11 of the Act.

The Executive Director may approve the proposed changes to the construction or design if he or she is satisfied that there are no adverse impacts in relation to the matters specified in (a)-(e) above. If the Executive Director is not satisfied, he or she will refer the proposal to the Commission for determination.

Submissions

3. It wants to construct a new Count Room in the Level 2 Car Park at the Christchurch casino. The existing Count Room on Level 1 (MGF) will remain unchanged but unused for the time being. The construction of the new Count Room is intended to be completed as part of the NBS reinstatement work in November 2026.
4. If approved, the design of the new room and its operational arrangements will comply with most of the requirements of condition 10 of its Venue Licence. Condition 10(a)-(e) requires: effective CCTV surveillance coverage in accordance with the Surveillance Standard; an alarm device connected to the entrance of the Count Room door which will signal the Surveillance Department whenever the door is opened; a telephone link; a transparent count table; and an area to house a lockable cabinet or trolley for the storage of drop boxes, which has a double-lock system.
5. Sub-condition 10(f) of its Venue Licence provides that the Count Room shall have "... a coin storage area with a double lock system with access from the count room while still inside the secure area." As coins are no longer accepted in EGMs or at gaming tables, no coin counting activities will be undertaken in the Count Room so it does not propose to build a coin storage area. That is, a coin storage area is no longer operationally applicable to the proposed Count Room.
6. It will retain the Strongroom on Level 1. This will provide secure storage for the limited quantity of coins that it retains for cash transactions at the Cage and Food & Beverage facilities.
7. The Secretary had no regulatory concerns with CCL's proposal. While the proposal involves the movement of the Count Room to an area outside a designated Gambling Area (with age restriction), access to a count room is limited, by Part 4 Security, Access Control of the Minimum Operating Standards for Casinos, to Certificate of Approval holders and all such holders are aged 20 years or older. While the proposed Count Room will not include a coin storage area, as required by condition 10(f), as coin counting is no longer undertaken in the Count Room, the Secretary considers that the condition no longer has operational application.

Decision

8. CCL submitted that it would comply with all aspects of condition 10 of CCL's venue licence except for sub-condition 10(f) which requires the Count Room to have a coin storage area. CCL submitted that sub-condition 10(f) is operationally redundant because coins are no

longer accepted for gambling purposes at the Christchurch Casino, meaning that a coin storage area is no longer necessary, which the Secretary has confirmed.

9. Casino licence holders cannot elect which conditions to comply with, regardless of a change in their operating environment. Casino licence holders must comply with all licence conditions and in this case, this includes CCL complying with sub-condition 10(f). If a licence condition is no longer operationally applicable, it is incumbent upon the Licence Holder to make an application to the Gambling Commission under section 139 of the Gambling Act 2003 to amend or delete that condition.
10. The Commission was satisfied that the proposed construction and design change would not adversely impact any of the matters set out in condition 7. The construction and design change is approved by the Executive Director under delegated authority pursuant to conditions 6 and 7 of CCL's venue licence.
11. CCL's subsequent use of the new Count Room is conditional however upon CCL either complying with sub-condition 10(f) (one of the Secretary's Gambling Inspectors can inform the Commission about this), or securing amendment or deletion of sub-condition 10(f) (to remove the obligation for the new Count Room to have a coin storage), by appropriate application to the Commission under section 139.



Blair Cairncross
Executive Director
Gambling Commission

22 October 2026

