

IN THE MATTER of the Gambling Act 2003

AND on applications by
CHRISTCHURCH CASINOS LIMITED to vary its designated Gambling Area, to vary licence conditions attached to its venue and operator's licences, for approval of new floor plans, and for approval of construction and design changes

BEFORE THE GAMBLING COMMISSION

Members: L M Hansen (Chief Gambling Commissioner)
D C Matahaere-Atariki
W N Harvey
S C L Pearson

Date of Application: 28 July 2020

Date of Decision: 11 September 2020

Date of Notification
of Decision: 11 September 2020

DECISION ON APPLICATIONS BY CHRISTCHURCH CASINOS LIMITED TO VARY ITS DESIGNATED GAMBLING AREA, TO VARY LICENCE CONDITIONS ATTACHED TO ITS VENUE AND OPERATOR'S LICENCES, FOR APPROVAL OF NEW FLOOR PLANS, AND FOR APPROVAL OF CONSTRUCTION AND DESIGN CHANGES

Introduction

1. Christchurch Casinos Limited ("**CCL**") applied to the Commission:
 - (a) for approval, pursuant to condition 12 of CCL's operator's licence, of new floor plans;
 - (b) for approval, pursuant to conditions 6 and 7 of CCL's venue licence, of construction and design changes;
 - (c) to vary condition 9A of CCL's venue licence, under section 139(1)(d) of the Gambling Act 2003 (the "**Act**"). Condition 9A sets out the designated Gambling Areas at the Christchurch casino;
 - (d) to vary conditions 6 and 12 of CCL's venue licence and conditions 13, 14, 15, 18, 20 and 23 of CCL's operator's licence, under to section 139(1)(d) of the Act, to incorporate the amended Gambling Area Schedules.

Licence conditions

2. The relevant licence conditions are as follows:

CCL venue licence

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 (Schedule 1) and Additional Gambling Areas (Schedules 2, 3, 4 or 5) 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 Car Park 2, Level 1 and 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.

8. The Licence Holder shall ensure that:
- (a) gambling activity is not visible from outside the Casino Venue; and
 - ...
- 9A The Gambling Area within the Casino Venue comprises the areas specified in plans marked "Schedules 1, 2, 3, 4 or 5" annexed to the Commission decision GC18/20. The standard Gambling Area for the Casino Venue is delineated in schedule 1. The Additional Gambling Areas for the Casino Venue are delineated in Schedules 2, 3, 4 or 5 and will form part of the Gambling Area only when activated as provided in condition 9B.
12. The approval of the Commission is required for the construction of any additional cashiering facilities in the Gambling Area (Schedule 1) and Additional Gambling Areas (Schedules 2, 3, 4 or 5). Any such additional facilities must comply with the surveillance equipment requirements set out in the Surveillance Standard and be fitted with manually triggered alarm systems connected to the surveillance department.

CCL operator's licence

13. A maximum of 4 automatic teller machines is permitted in the Casino Venue outside the Gambling Area (Schedule 1) and Additional Gambling Areas (Schedules 2, 3, 4 or 5).
14. Except as approved in writing by the Commission, the Licence Holder is prohibited from dispensing cash from EFTPOS and like devices in the Gambling Areas (Schedule 1) at all times and Additional Gambling Areas (Schedules 2, 3, 4 or 5) whenever the Additional Gambling Areas are activated pursuant to condition 9B. The approval of the Commission shall be

revocable at the discretion of the Commission and may be subject to such conditions as the Commission may from time to time impose.

15. The Licence Holder is prohibited from using mobile EFTPOS terminals (cash or non-cash dispensing) or like devices in the Gambling Area (Schedule 1) at all times and in the Additional Gambling Areas (Schedules 2, 3, 4 or 5) whenever the additional Gambling Areas are activated pursuant to condition 9B unless approved by the Commission. The approval of the Commission shall be revocable at the discretion of the Commission and may be subject to such conditions as the Commission may from time to time impose.
18. The Licence Holder is required to notify the Commission if it moves ATMs in the Casino Venue or if it installs or moves EFTPOS terminals or like devices in the Gambling Area (Schedule 1) and Additional Gambling Areas (Schedules 2, 3, 4 or 5).
20. The Licence Holder shall provide security and surveillance equipment and facilities in the Gambling Area (Schedule 1) and Additional Gambling Areas (Schedules 2, 3, 4 or 5) and surveillance areas which shall at all times meet and may exceed the Surveillance Standard in whatever form is currently approved by the Commission. The Commission may at any time institute an audit or require the Licence Holder to report on the standard and/or quality of surveillance equipment to ensure it meets or exceeds the Surveillance Standard.
23. The approval of the Commission is required for the construction of any additional cashiering facilities in the Gambling Area (Schedule 1) and Additional Gambling Areas (Schedules 2, 3, 4 or 5). Any such additional facilities must comply with the surveillance equipment requirements set out in the Surveillance Standard and be fitted with manually triggered alarm systems connected to the surveillance department.

Relevant sections of the Act

3. The relevant sections of the Act as follows:

Gambling Act 2003

139 Conditions of casino licence

- (1) The Gambling Commission may specify the conditions of a casino licence or vary or revoke the conditions of a casino licence in the following circumstances:
 - (a) on granting a casino operator's licence;
 - (b) on renewing a casino venue licence;
 - (c) on approving a casino venue agreement or an amendment to it;
 - (d) on application by the holder of the casino licence;
 - (e) on its own initiative or on the request of the Secretary.
- (2) A condition of a casino licence specified under subsection (1)—
 - (a) must be consistent with this Act; and
 - (b) must contribute to achieving the purpose of this Act; and
 - (c) must contribute to the efficient and effective administration of this Act; and
 - (d) must not permit an increase in the opportunities for casino gambling; and
 - (e) may relate to any matter, including the matters specified in Schedule 1, within the confines of paragraphs (a) to (d).

140 Procedure for specifying, varying, or revoking casino licence conditions

- (1) The Gambling Commission must notify the holder of the relevant casino licence, the Secretary, and any other person who it considers is affected by a proposal to specify, vary, or revoke the conditions of a casino licence.
- (2) Notification under subsection (1) must include—
 - (a) the reason for the proposal; and
 - (b) the procedure to be followed before the Gambling Commission makes a decision relating to the proposal.
- (3) The holder of the casino licence, the Secretary, and any other person affected may make written submissions to the Gambling Commission concerning the proposal within 20 working days after the date of the notice under subsection (1) or within any longer period that the Gambling Commission allows.
- (4) The Gambling Commission must consider any submissions made under subsection (3) and may, if it considers it appropriate, seek comment from the casino licence holder on the submissions received from the Secretary or other persons affected.
- (5) The Gambling Commission must notify the holder of the casino licence, the Secretary, and other persons affected of—
 - (a) its decision concerning the proposal and the reasons for the decision; and
 - (b) the right to appeal the decision and the process for an appeal.

CCL's submissions

4. CCL submitted, in summary, as follows:
 - (a) It has learnt the following during the various Alert Levels in response to the COVID-19 pandemic:
 - (i) Its customers are still apprehensive, and many enjoy having more space around them as they play at the casino.
 - (ii) COVID-19 has put an end to buffet dining, with patronage in the Grand Café and Chi restaurants having never recovered.
 - (iii) There is the real possibility that COVID-19 will get into the community again and, with that, it may need to enforce physical distancing again.
 - (iv) Its business has not returned to pre-COVID levels.
 - (b) All of these factors have led it to a proposal to amend its floor plans. Through the implementation of this floor plan, it hopes to meet the expectations and desires of its customers by maximising the use of available space within the casino. The proposal also provides some degree of future-proofing, should there be an escalation in COVID Alert Levels.

- (c) This application will see the casino return to a full complement of 36 tables, but it will operate with significantly fewer EGMs than its licence provides; at just 452 out of a maximum of 500.
- (d) Key points to its proposal are as follows:
- (i) The shuttering of the Grand Café and Chi Restaurants is a business decision. It was partially forced and accelerated by COVID-19, as guests no longer want buffet-style dining. The lack of international tourists is also a contributing factor.
 - (ii) These two restaurant spaces are significantly under-utilised so it wants to remove a concertina wall, four pivoting doors and a small length of wall bordering the Grand Café entrance
 - (iii) The removal of the walls will create a large, open space with easy access to kitchen facilities. It will still use these kitchen facilities, but it wants to establish a new F&B area/respice space on the tiled area that previously accommodated the buffet stations for the Grand Café.
 - (iv) It then wants to redeploy 63 EGMs into the Grand Café/Chi areas. The EGMs will be generously spaced apart from each other, as per the proposed floor plan accompanying its application.
 - (v) Previously the Grand Café and Chi restaurants were open only from Wednesday to Sunday. The new F&B outlets will be open any time that the casino is operating.
 - (vi) The number of dining seats will be reduced by about 75, but the reduction is proportionate to the current guest numbers relative to pre-COVID visitations.
 - (vii) It wants to replace the current tiled entranceway with carpet to match what is already in place, from the beginning of the Gambling Area to the existing carpeted area. The windows currently have wooden louvre shutters. At this stage its plan is to split these louvres horizontally, so that only the top quarter is able to be open, while the bottom sections will remain permanently closed. In any event, it will also apply suitable window treatments to ensure no gambling will be visible from outside the premises.
 - (viii) To ensure ongoing compliance with the Surveillance Standard, it plans to install four 360 degree cameras and five additional Pan-Tilt-Zoom cameras.

Main Gaming Floor reorientation of tables and new stage area

- (ix) It also plans to reorientate the table games on the MGF and create a stage for announcements and promotions. Currently the tables are at a 45 degree angle to the external walls. It proposes to rearrange them in straight lines so that they align with the EGM layout and the external walls.
- (x) However, it has found it difficult to accommodate all 20 Rapid Roulette terminals in one block using this configuration, so it proposes to leave 12 terminals surrounding the wheel in the middle of the floor and locate the remaining eight terminals against the wall to the left of a new stage.
- (xi) These proposed changes will improve visibility by creating unimpeded lines of sight. Together with the additional cameras and the opening up of the floor in the Grand Café and Chi areas, staff will be better able to monitor players for any signs of harmful behaviours.

Valley Bar extension

- (xii) The spreading out and movement of EGMs has also created the opportunity to extend the Valley Bar area into space that is currently used to house EGMs. This area is now planned to be a dine and dance space. It wants to create this as its own distinct space defined by a new internal partition to the southern end of the bar with room for a small stage for performers.
- (xiii) Food services in the Valley Bar will be ordered in from casino's other internal kitchens. The menus throughout the casino will still have full F&B options, but with a greater focus on fast, high quality bar meals.

Defined Gambling Areas

- (xiv) It has previously applied to have the Grand Café and Chi restaurant areas designated as Gambling Area. The current proposal, if approved, would be a permanent change. It therefore anticipates that the Commission would prefer to see these areas included as permanent Gambling Areas rather than as additional Gambling Areas. This alteration also reflects its change in thinking for the use of these spaces.
- (xv) It therefore suggests a change to condition 9A attached to CCL's venue licence. Rather than there being four additional Gambling Areas, there would be just two; namely the Monza Sports Bar (on Level 2) and the area previously used for events and called Sixty6 on Peterborough (Car Park 2).

(xvi) It also wants to reduce the Gambling Area at the entrance to the new EGM/F&B space (to align with the remaining wall bordering the public restrooms) and to remove the stairs from Level 1 to Level 2 from being included within the Gambling Area.

(xvii) It proposes that condition 9A be amended as per the mark-ups below:

The Gambling Area within the Casino Venue comprises the areas specified in plans marked "Schedules 1, 2, ~~and 3 4 and 5~~" annexed to Commission decision GC19/12[insert decision number]. The standard Gambling Area for the Casino Venue is delineated in Schedule 1. The Additional Gambling Areas for the Casino Venue are delineated in Schedules 2, ~~and 3, 4 and 5~~ and will form part of the Gambling Area only when activated as provided in condition 9B.

(xviii) This change, if approved, would require consequential changes to conditions 6 and 12 of its Venue Licence and conditions 13, 14, 15, 18, 20 and 23 of its Operators Licence.

(xix) From a Host Responsibility perspective, it believes the new floor plan will be advantageous. The straight lines will improve visibility and with fewer EGMs and more space around those on the floor, any harmful behaviours will be even more obvious. There will also be additional Host Responsibility signage incorporated onto the end of bank displays in the new area.

The Secretary for Internal Affairs' submissions

5. The Secretary submitted that he has no regulatory concerns with CCL's proposal.

Salvation Army's submissions

6. SA submitted, in summary, as follows:

(a) It would prefer that casino operators' full intentions be provided upfront. As a submitting party this would assist it to get a sense of the full scope and consequences of an application, so that it can provide an appropriate response. However, it does also note that CCL has indicated in the current application that the concessions it seeks reflect a "change in thinking" for the use of the additional gambling area spaces.

(b) It understands that CCL effectively wishes to convert the additional Gambling Areas on Level 1 of the casino into standard gambling areas, and then relocate 63 EGMs into those areas, as well as reorient some table games and Rapid Roulette terminals.

- (c) The Commission should consider that distributing the EGMs across a larger space could have an impact on the casino's host responsibility and harm minimisation function in that existing staff would have a greater area to monitor.
- (d) Proposed reductions to the F&B options on the casino floor are also relevant to harm minimisation, as these activities provide necessary respite from gambling. However, it also notes that these proposed changes might be balanced by the added space between EGMs, the increased camera coverage, the fact that the Valley Bar will be extended into space previously occupied by EGMs, the increased hours of the F&B outlets, and the current reduced patronage at the casino after the emergence of COVID-19.
- (e) It is difficult to distinguish the EGMs and Rapid Roulette terminals from the floor plan attached to CCL's application. It is therefore unclear on the proposed layout changes. However, based upon the application, the changes appear to be superficial in nature and unlikely to have any negative effects.
- (f) It supports the reduction of the Gambling Area at the entrance to the new EGM/F&B space, and the supporting rationale that this will provide a greater distance to react and prevent access by any person aged under 20.

PGF Service's submissions

- 7. PGF submitted, in summary, as follows:
 - (a) When applications of this nature are made to the Commission, they are sometimes of obvious interest to PGF in its mission to minimise harm caused by gambling. In this case, it is not informed enough to comment on such a possible outcome. The application is mainly about catering and workflow.
 - (b) There may also be an element of customer movement through the premises but again, it is not in a position to understand this other than superficially. The main source of knowledge about these matters comes from the casino industry and the management of CCL itself.
 - (c) If it is in the Commission's powers, it should, in these more indeterminate instances, ask the applicant to warrant that there will be no increase in gambling harm from these rearrangements. Further, that there be a penalty regime which will apply if it later appears that there has been an increase in harm, and in circumstances that the casino could have anticipated.

- (d) If it is later proven that there has been an increase in harm in circumstances that the casino could not have anticipated, that they will take action, approved by the Commission, to make good the situation.
- (e) There is nothing in the Act to prevent the Commission from adopting such a procedure.

Ministry of Health's submissions

- 8. MoH is confident that the changes will have no negative impacts on gambling harm.

Applicant's submissions in reply

- 9. In reply, CCL submitted, in summary, as follows:

- (a) SA commented on the potential impact of its proposal in relation to having EGMs distributed across a larger area and the impact that this may have on host responsibility and harm minimisation, and the changing use of areas previously used for F&B.
- (b) SA noted that these changes are likely to be balanced by other changes within the overall application. These include the added space between machines, the additional surveillance measures, the fact that the Valley Bar will be extended into an area previously occupied by EGMs, the increased hours of the F&B outlets, and the current reduced patronage at the casino.
- (c) SA has concluded that the proposal is unlikely to have any negative effects.
- (d) PGF suggests that the application does not inform it enough to comment on whether the proposed changes will have any impact on potential gambling harm. As a consequence, they are suggesting the imposition of further regulatory controls and penalties. It strongly opposes such a suggestion, as it ignores the various stringent controls that area already in place, designed specifically to prevent and minimise gambling harm.
- (e) PGF and the Commission can be assured that the customer experience, including the potential to prevent and minimise gambling harms, is front of mind whenever any changes to floor plans or business model is considered.
- (f) The casino is a legitimate business that recognises the potential for harm and it actively works with all its stakeholders and customers to try to create a safe environment in all respects. The current application will deliver an environment that is spacious, comfortable, and helps to encourage only responsible behaviours, particularly in relation to gambling and the service of alcohol.

(g) The MoH and the Secretary have no concerns.

Analysis

10. CCL has previously obtained Commission approval to redesignate the Gambling Areas at the Christchurch casino, with the Grand Café and Chi being designated as Additional Gambling Areas by decision GC18/20. CCL now wants to include these areas as part of the casino's standard Gambling Area so that it can deploy 63 EGMs there pursuant to a new floor plan.
11. The Commission consulted widely on CCL's proposal, inviting submissions from the Secretary, SA, PGF, MoH, Christchurch City Council and Canterbury DHB. Christchurch City Council and Canterbury DHB elected not to file submissions, while the four parties that did submit were largely untroubled by CCL's application. The Secretary and MoH in particular, were confident that the proposed changes would not have a negative impact on gambling harm.
12. The Grand Café and Chi have, until now, been used almost exclusively for F&B purposes, so CCL's proposal to deploy EGMs there is reasonably significant in that it involves a reduction of non-gambling space, and a corresponding increase in space in which gambling can take place.
13. On its own, such a change may be considered problematic, but it represents only part of CCL's overall proposal. When the Commission considered the totality of what was put forward, it was satisfied that the proposal did not raise any issues of regulatory concern.
14. In addition to deploying EGMs into the Grand Café and Chi, CCL will create a new F&B facility within the Grand Café area, extend the Valley Bar into space that is currently used to house EGMs in order to create a dine and dance area with F&B services, and extend the hours of the casino's F&B options. CCL will also space its gambling product more generously and reposition a number of gaming tables. It submitted that these changes would have harm minimisation benefits as any harmful behaviours would be even more obvious, particularly with its increased camera surveillance.
15. Given all of these proposed changes, the Commission was satisfied that CCL's proposed floor plans, including the deployment of 63 EGMs in the Grand Café and Chi areas, raised no issues of regulatory concern and would not have a negative effect on harm.
16. The Commission was not supportive of the proposal by PGF to impose new penal conditions relating to later detection of increased levels of harm. No such conditions have been imposed in casinos in the past (so the implications of doing so are unknown) and it would be necessary to create robust and fair measurements of harm, as no such measure

currently exists. None of the submitters expected that harm would be increased by the proposals and the Commission was satisfied that the new floor plans would not have a negative effect on harm, and were consistent with the purpose of the Act.

Other Matters

17. In addition to including the Grand Café and Chi within the standard Gambling Area, CCL also proposed other amendments to the casino's Gambling Area; by removing the stairs from Level 1 to Level 2, and by removing a small area at the entrance to the Grand Café areas.
18. The Commission has previously considered whether it has the power to redefine a casino's Gambling Area, holding that it can do so provided that the amended area does not extend beyond the venue as defined in the casino venue licence, and the licence conditions defining the area are consistent with section 139(2) of the Act.
19. CCL's changes do not extend beyond the venue and the Commission was satisfied that the changes are consistent with section 139(2) of the Act. It approved the redesignations accordingly.
20. Consistent with this change, the Commission amended licence conditions 6, 9A and 12 of CCL's venue licence, and conditions 13, 14, 15, 18, 20 and 23 of CCL's operator's licence, to reflect the amended Gambling Areas and Gambling Area Schedules, and to incorporate them within the appropriate licence conditions.
21. CCL also proposed a number of construction and design changes throughout the casino, but particularly to the area around the Grand Café and Chi. The changes are minor and the Commission was satisfied that they would have no adverse effect on any of the matters set out in condition 7.
22. Finally, the Commission was satisfied that CCL understands that it must take appropriate steps to ensure that gambling activity is not visible from outside the Casino Venue, consistent with condition 8(a) of CCL's venue licence.

Decision

23. The Commission decided:
 - (a) to approve new floor plans, (Level 1 MGF July 2020 2 and Level 2 Gallery July 2020 2) (**attached**), pursuant to condition 12 of CCL's operator's licence;
 - (b) to approve the proposed construction and design changes, pursuant to conditions 6 and 7 of CCL's venue licence;

- (c) to vary, pursuant to section 139(1)(d) of the Act, condition 9A of CCL's venue licence, to vary the casino's Gambling Area. New Schedules 1, 2 and 3 are **attached**; and
- (d) to vary, pursuant to section 139(1)(d) of the Act, conditions 6 and 12 of CCL's venue licence, and conditions 13, 14, 15, 18, 20 and 23 of CCL's operator's licence, to incorporate the amended Gambling Area.

24. The amended licence conditions now provide as follows:

CCL's venue licence

- 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 (Schedule 1) and Additional Gambling Areas (Schedules 2 or 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 Car Park 2, Level 1 and 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.

- 9A The Gambling Area within the Casino Venue comprises the areas specified in plans marked "Schedules 1, 2 and 3" annexed to the Commission decision GC23/20. The standard Gambling Area for the Casino Venue is delineated in schedule 1. The Additional Gambling Areas for the Casino Venue are delineated in Schedules 2 and 3, and will form part of the Gambling Area only when activated as provided in condition 9B.
- 12. The approval of the Commission is required for the construction of any additional cashiering facilities in the Gambling Area (Schedule 1) and Additional Gambling Areas (Schedules 2 or 3). Any such additional facilities must comply with the surveillance equipment requirements set out in the Surveillance Standard and be fitted with manually triggered alarm systems connected to the surveillance department.

CCL operator's licence

- 13. A maximum of 4 automatic teller machines is permitted in the Casino Venue outside the Gambling Area (Schedule 1) and Additional Gambling Areas (Schedules 2 or 3).

14. Except as approved in writing by the Commission, the Licence Holder is prohibited from dispensing cash from EFTPOS and like devices in the Gambling Areas (Schedule 1) at all times and Additional Gambling Areas (Schedules 2 or 3) whenever the Additional Gambling Areas are activated pursuant to condition 9B. The approval of the Commission shall be revocable at the discretion of the Commission and may be subject to such conditions as the Commission may from time to time impose.
15. The Licence Holder is prohibited from using mobile EFTPOS terminals (cash or non-cash dispensing) or like devices in the Gambling Area (Schedule 1) at all times and in the Additional Gambling Areas (Schedules 2 or 3) whenever the additional Gambling Areas are activated pursuant to condition 9B unless approved by the Commission. The approval of the Commission shall be revocable at the discretion of the Commission and may be subject to such conditions as the Commission may from time to time impose.
18. The Licence Holder is required to notify the Commission if it moves ATMs in the Casino Venue or if it installs or moves EFTPOS terminals or like devices in the Gambling Area (Schedule 1) and Additional Gambling Areas (Schedules 2 or 3).
20. The Licence Holder shall provide security and surveillance equipment and facilities in the Gambling Area (Schedule 1) and Additional Gambling Areas (Schedules 2 or 3) and surveillance areas which shall at all times meet and may exceed the Surveillance Standard in whatever form is currently approved by the Commission. The Commission may at any time institute an audit or require the Licence Holder to report on the standard and/or quality of surveillance equipment to ensure it meets or exceeds the Surveillance Standard.
23. The approval of the Commission is required for the construction of any additional cashing facilities in the Gambling Area (Schedule 1) and Additional Gambling Areas (Schedules 2 or 3). Any such additional facilities must comply with the surveillance equipment requirements set out in the Surveillance Standard and be fitted with manually triggered alarm systems connected to the surveillance department.

Right of appeal

25. Pursuant to section 235 of the Act, a person affected by this decision may appeal that decision to the High Court. An appeal must be made within 15 working days of the date of notice of the Commission's decision, or any longer period that the High Court may allow.

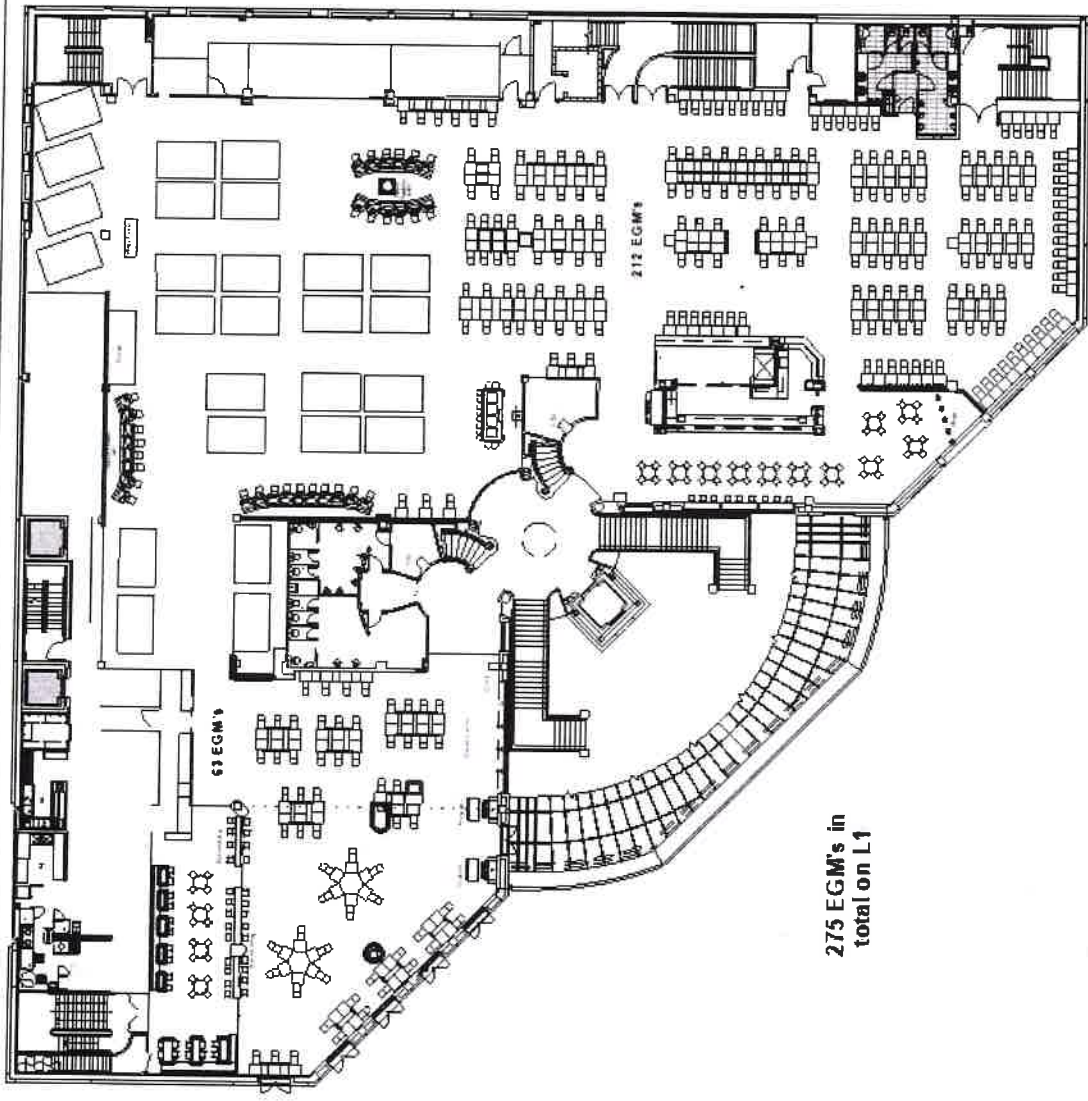


Lisa Hansen
Chief Gambling Commissioner

for and on behalf of the
Gambling Commission

11 September 2020





Christchurch Casinos Limited

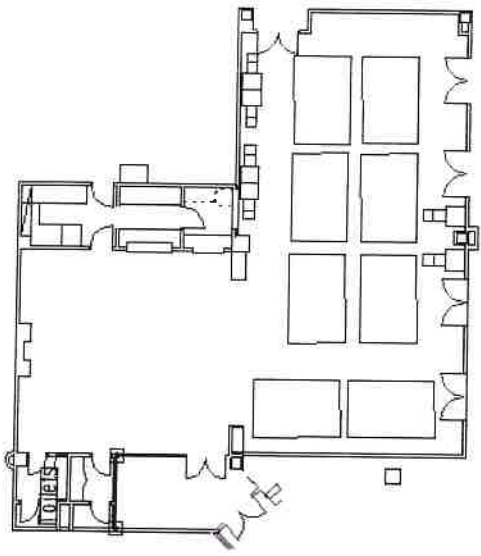
LEVEL 1 - Main Gaming Floor Plan

DATE:

July 2020 2

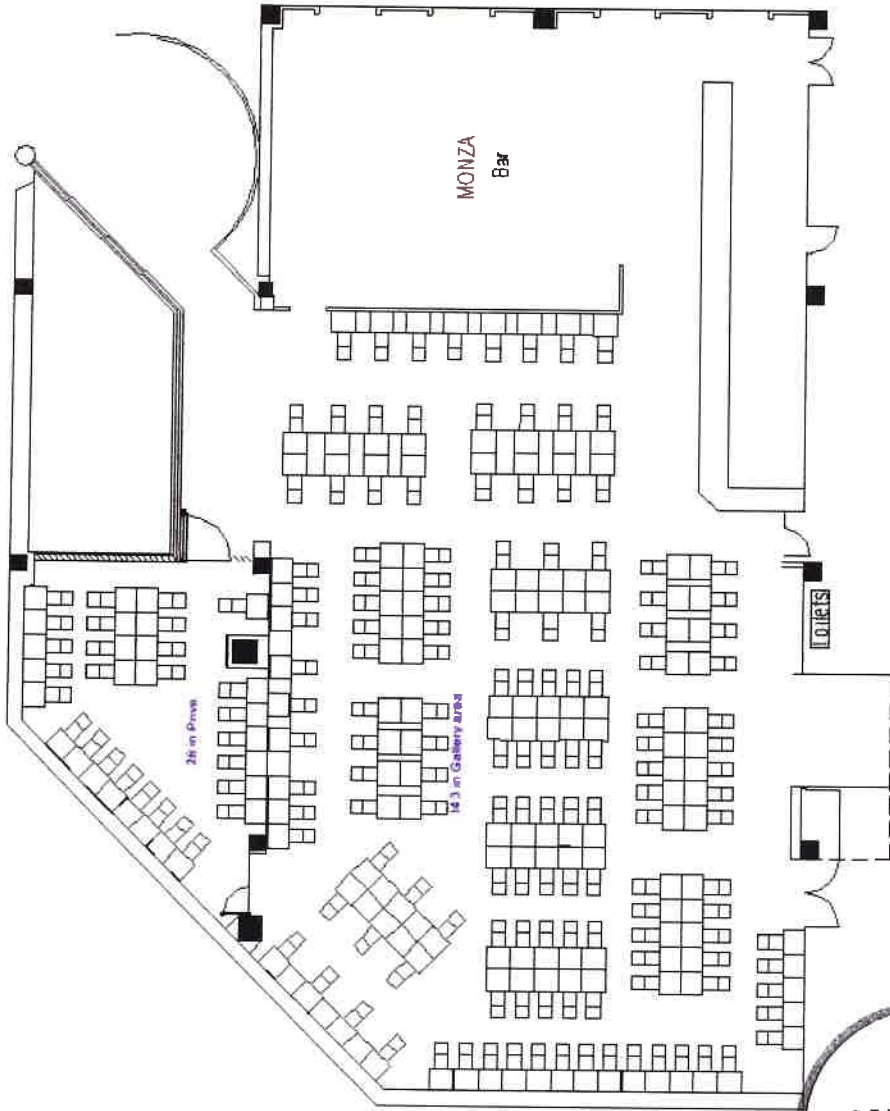
275 MACHINES - 28 Tables

SCALE 1:250



INSET : CLUB ASPINALL

177 EGM's in
total on L2



28 in Drive

143 in Gallery area

MONZA
Bar



Canterbury Casinos Limited

LEVEL 2 - Gallery Floor Plan

177 MACHINES - 8 Tables

DATE:

July 2020

2

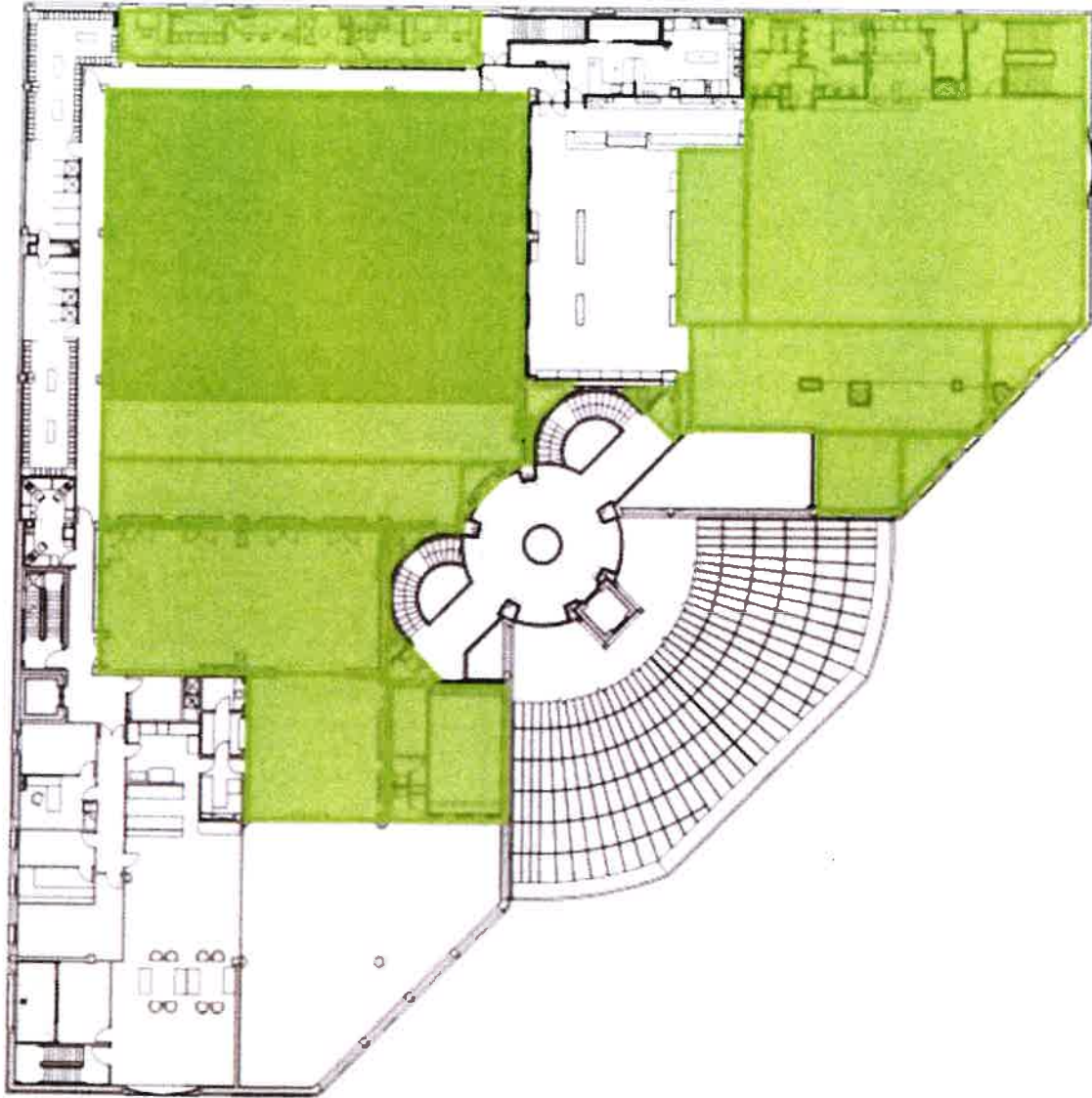
SCALE 1:250

Schedule 1

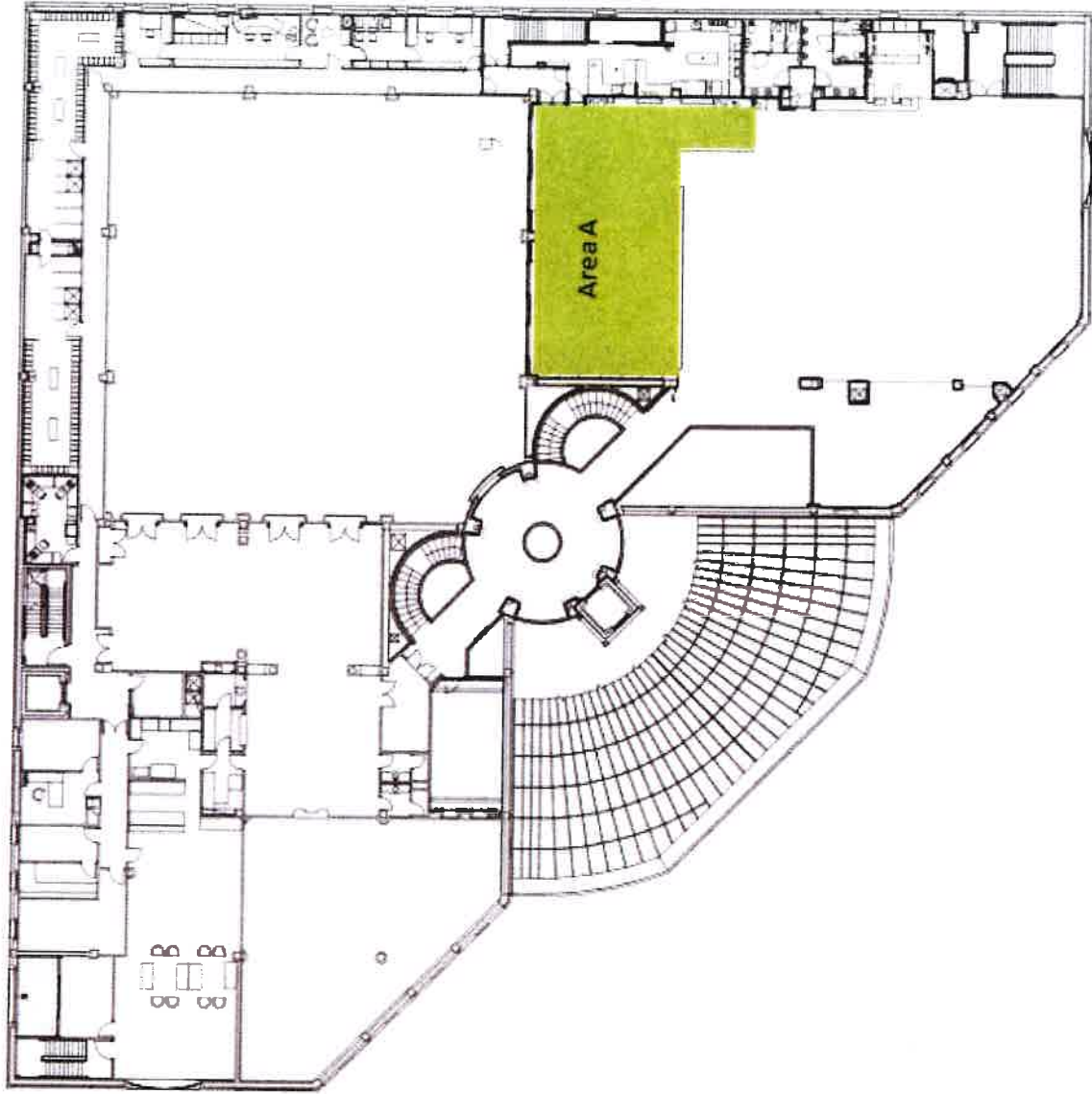
Designated Gambling Area - Level 1



Designated Gambling Area - Level 2



Schedule 2 (Level 2)



Schedule 3 (Lower Car Park Level)



**GAMBLING
COMMISSION**