

IN THE MATTER of the Gambling Act 2003


AND on an application by **SKYCITY AUCKLAND LIMITED** to vary conditions 9 and 9A of its venue licence for the Auckland casino

BEFORE THE GAMBLING COMMISSION

Members: G L Reeves (Chief Gambling Commissioner)
P J Stanley
L M Hansen
R D Bell
A K Foote

Date of Application: 21 June 2011

Date of Decision: 12 August 2011

Date of Notification of Decision:  September 2011

**DECISION ON AN APPLICATION BY SKYCITY AUCKLAND LIMITED
TO VARY CONDITIONS 9 AND 9A OF ITS VENUE LICENCE
FOR THE AUCKLAND CASINO**

Introduction

1. SKYCITY Auckland Limited ("**SCAL**") applied, pursuant to section 139(1)(d) of the Gambling Act 2003 (the "**Act**"), to vary licence conditions 9 and 9A of its venue licence. The licence conditions, with the proposed amendments shown in mark-up, are as follows:

9. The current Gambling Area for the casino venue is delineated in the plan attached as Schedule 1 to these conditions. A first alternative Gambling Area is delineated in the plan attached as Schedule 2. A second alternative Gambling Area is delineated in the plan attached as Schedule 3. ~~A third alternative Gambling Area is delineated in the plan attached as Schedule 4.~~ A third alternative Gambling Area is delineated in the plan attached as Schedule 3A. A fourth alternative Gambling Area is delineated in the plan attached as Schedule 3B. A fifth alternative Gambling Area is delineated in the plan attached as Schedule 4. A sixth alternative Gambling Area is delineated in the plan attached as Schedule 4A. A seventh alternative Gambling Area is delineated in the plan attached as Schedule 4B.
- 9A. A change of Gambling Area will take effect subject to the Licence Holder providing the Commission and the Inspectorate a minimum of 10 working days prior notice in writing of its intention to adopt one of the approved Gambling Areas referred to in Condition 9 and shown in Schedules 1, 2, 3, 3A, 3B, or 4, 4A or 4B.



The Act

2. The relevant sections of the Act are as follows:

3. Purpose

The purpose of this Act is to—

- (a) control the growth of gambling; and
- (b) prevent and minimise the harm caused by gambling, including problem gambling; and
- (c) authorise some gambling and prohibit the rest; and
- (d) facilitate responsible gambling; and
- (e) ensure the integrity and fairness of games; and
- (f) limit opportunities for crime or dishonesty associated with gambling; and
- (g) ensure that money from gambling benefits the community; and
- (h) facilitate community involvement in decisions about the provision of gambling.

4. gambling area means,-

...

- (b) for a casino venue, that part of the venue that is specified by the Gambling Commission under section 139 or the Casino Control Authority under the Casino Control Act 1990 as an area where casino gambling is permitted or, if the Gambling Commission does not specify an area under that section or the Casino Control Authority has not specified an area, the casino venue

139. Conditions of casino licence

- (1) The Gambling Commission may specify the conditions of the 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 purposes 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).

Schedule 1

Conditions that may attach to casino licence

...

- 7 The designation of areas within a casino where casino gambling may be conducted.

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.

303 Age restriction on gambling in casinos

...

- (2) Every holder of a casino operator's licence commits an offence who allows a person under 20 years –
 - (a) to participate in casino gambling; or
 - (b) to enter, or remain in, the gambling area of a casino.

Submissions by SCAL

3. SCAL submitted, in summary, as follows:

- (a) It wants to amend conditions 9 and 9A by adding a further four alternative Gambling Areas to the already approved alternative Gambling Areas. Schedules 3A and 4A would exclude Bar 21 from the Gambling Area while Schedules 3B and 4B would exclude Bar 21 and the area which is being used for the relocated Fortuna Restaurant (the “**affected areas**”).
- (b) It is still considering the long term future of level 3 and is seeking the discretion to exclude one or both of the affected areas from the Gambling Area designation while retaining the right to reactivate them as Gambling Areas at a later date. Excluding the affected areas from the Gambling Area would enable it to provide a wider level of access to these areas and dispense with the need to police age restrictions at entry points.
- (c) The retention of existing schedules of alternative gambling areas would enable it to reactivate these areas at a later date if it chooses.
- (d) Three gaming tables are currently located in Bar 21 but it intends to relocate these elsewhere. Once gambling products are removed, there is no point retaining Bar 21 as Gambling Area because notwithstanding the absence of gambling products, a security officer would be needed to police entry to ensure gambling area restrictions are satisfied.

- (e) Up until the time of its recent closure, Fortuna Restaurant on level 2 operated as a family restaurant that was not subject to age restrictions. The location for the new Fortuna Restaurant on level 3 is currently designated as Gambling Area, meaning access would be limited to guests over 20 years. The target demographic for this restaurant is still being considered, and may change over time to accommodate events such as the Rugby World Cup. As it is not intended to locate gambling products in the Fortuna Restaurant, and the Restaurant will be accessible to the public from non-gambling areas, discretion is sought to redesignate the area and allow the restaurant to operate without an age restriction.
- (f) In the event that Schedule 3A or 4A is adopted as the preferred Gambling Area, the doors leading from Bar 21 to the level 3 area in which Fortuna is to be relocated are likely to be closed off. Alternatively, if access is made available from Bar 21, a security officer will be positioned outside to ensure persons entering the Gambling Area are of the required age.
- (g) In the event that Schedule 3B or 4B is adopted as the preferred Gambling Area, there would be two points of egress where restaurant guests under 20 years could potentially gain access to the gaming floor. The escalators outside Bar 21 (the eastern escalators) would be accessible to restaurant guests, as would the escalators at the southern end of level 3 (the southern escalators). Both sets of escalators provide access to the main gaming floor. A security officer would be stationed outside the eastern escalators. The security officer would be relocated from the current security location in the level 3 corridor, meaning responsibility for policing age restrictions into the Platinum Room would be left to the VIP hosts stationed at the reception desk directly outside the Platinum Room.
- (h) In terms of the southern escalators, it is currently scoping design changes which would prevent restaurant guests from using these escalators. Any such design changes would be subject to a further application. In the event that design changes are not feasible or cost effective, a further security officer will be stationed outside the southern escalators.
- (i) A condition of a casino licence specified or varied under section 139(1) must comply with the requirements set out in section 139(2). The proposed variation is consistent with the scheme of the existing condition which has already been deemed compliant with the requirements set out in section 139(2). In essence, the proposed variation would allow it to reduce the Gambling Area on level 3, and then subsequently reactivate the areas in question subject to a minimum notice

period. The notification process will ensure that there is adequate certainty surrounding what constitutes the Gambling Area at any particular point in time.

- (j) The implementation of any of the new alternative Gambling Areas would see a decrease in the Gambling Area on level 3, and the removal of gambling products from those areas to other parts of the casino floor. No adverse impacts relating to potential harm have been identified.
- (k) Sections 11 and 12 of the Act prohibit an increase in the opportunities for casino gambling. Section 139(2) also prohibits licence conditions that permit an increase in such opportunities. The new alternative Gambling Areas have no bearing on this issue. There will be no increase in table numbers, gaming machine numbers, player spaces or the size of gaming tables.

The Secretary's submissions

4. The Secretary submitted, in summary, as follows:

- (a) He was comfortable with SCAL's proposal, but thinks that underage or unauthorised persons could gain access to the Gambling Area if adequate safeguards are not in place.
- (a) While Bar 21 currently includes a Gambling Area and is restricted to people aged over 20, SCAL intends to revert it to a non-gambling bar restricted to people aged over 18. Bar 21 currently has two entrances, one of which is the western entrance next to a set of escalators leading directly onto the main gaming floor. SCAL states it may close this western entrance, or else station a security guard there. Both of these solutions would mitigate the risk of unauthorised access to the main gaming floor.
- (b) Fortuna Restaurant, which is currently designated as Gambling Area and restricted to people over 20, is also located at the top of these escalators. SCAL may turn this area into a family restaurant and position a security guard at the top of the escalators to stop unauthorised access to the main gaming floor. While this should mitigate the risk of unauthorised access to the Gambling Area, it would be difficult if the same security guard was called upon to police both the escalators and the Bar 21 entrance, being a licensed area with an age restriction. There is only a minor separation between the two areas, but on a busy night the risk of underage persons entering could be greatly increased, whereas if the western entrance to Bar 21 is closed off, this problem would not arise.



- (c) Fortuna Restaurant is also accessed by another set of escalators, the southern escalators, which lead directly to the main gaming floor. SCAL states that either a security guard will be positioned at the escalators, or this area will be redesignated so that it is closed off to restaurant customers. Both these measures would mitigate the risk of unauthorised access.
- (d) The entrance to the Platinum Room is also in the vicinity of the western entrance to Bar 21 (if it remains open), and the Atrium-end entrance to Fortuna Restaurant. SCAL proposes that entry to the Platinum Room will be policed by the Hosts, situated at the main desk at the Platinum Room entrance. The following concerns were identified with this arrangement:
- Patrons gain entry to the Platinum Room with a swipe-card. However due to the volume of patrons who use this room, there are occasions when access may be gained without the use of a swipe-card, by following other patrons through.
 - The area immediately outside the Platinum Room entrance will become much busier with the addition of the restaurant customers, many of whom may be underage. On a busy night, it may be possible for underage persons to enter the Platinum Room if the Hosts are not strict about policing the area.
 - The Inspectorate has observed that the Platinum Hosts are often called upon to attend to patron queries, and are therefore, at times, distracted from controlling access to the room.
 - Currently Hosts police entry at the Pacific Room as per the Security Minimum Operating Standard, but in contrast to the Platinum Room, there are fewer members. However the Inspectorate has noted instances recently where minors have gained access to the recently decommissioned International Room which was also under the control of Pacific Room Hosts.
- (e) Compliance with underage and unauthorised access at the casino is the operator's responsibility. Should the Commission approve this application, the Inspectorate will maintain supervision of access with interest.



SCAL's submissions in reply

5. In reply, SCAL submitted as follows:

- (a) The Secretary was, on the whole, comfortable with its proposal but has identified potential risks with underage and unauthorised access.
- (b) The need to provide a security presence to police the western entry/exit to Bar 21 would only arise if either schedule 3A or 4A were adopted, in which case it would need to ensure that persons accessing the gaming floor from Bar 21 were the required age. In this event, either the western entrance to Bar 21 would be closed, or alternatively a security guard would be stationed in that area. None of the proposals would require both the western entry to Bar 21 and the eastern escalators to be policed at the same time – it would not be practical to do so.
- (c) With regard to access issues around the southern escalators, there is currently an application before the Commission to erect a wall that would prevent restaurant customers from accessing the Main Gaming Floor.
- (d) It is confident that reception staff at the Platinum Room can manage the task of policing access, to ensure that only those who are authorised to enter the Room may do so. The area will be staffed to ensure that obligations are fulfilled in this regard.

Analysis

- 6. SCAL presently has four sets of approved plans depicting different Gambling Areas at the Auckland casino, and seeks approval for four additional plans.
- 7. The proposed alternative plans do not involve any increase to the total area already incorporated in the current alternative plans. The proposed variations all involve forms of reduction in the gambling area compared to the current plans. SCAL is seeking the alternative option to preserve flexibility, having regard to the age restrictions imposed by section 303 of the Act.
- 8. As SCAL's application involves the variation of licence conditions, section 139(2) of the Act provides that the variations must: be consistent with the Act, contribute to achieving the purposes of the Act, contribute to efficient and effective administration of the Act, and not permit an increase in opportunities for casino gambling. The purpose of the Act is set out at section 3.



9. The Secretary raised only one regulatory concern, namely a possible increased risk of underage or unauthorised access. However, SCAL is aware of the risk, identifying it in its application together with the methods which it proposes to adopt to address that risk.
10. The monitoring of entrance points is already an activity that SCAL undertakes on a daily basis in order to ensure that it complies with the Act and licence conditions. If it increases the number of entry points, it knowingly increases the extent of its monitoring obligation to ensure compliance. SCAL is well aware of the potential consequences of breaking its obligations and the view which is likely to be taken of breaches which arise from the acknowledged risk.

Decision

11. The Commission amended licence conditions 9 and 9A of SCAL's venue licence pursuant to section 139(1)(d). Conditions 9 and 9A now provide as follows:

9. The current Gambling Area for the casino venue is delineated in the plan attached as Schedule 1 to these conditions. A first alternative Gambling Area is delineated in the plan attached as Schedule 2. A second alternative Gambling Area is delineated in the plan attached as Schedule 3. A third alternative Gambling Area is delineated in the plan attached as Schedule 3A. A fourth alternative Gambling Area is delineated in the plan attached as Schedule 3B. A fifth alternative Gambling Area is delineated in the plan attached as Schedule 4. A sixth alternative Gambling Area is delineated in the plan attached as Schedule 4A. A seventh alternative Gambling Area is delineated in the plan attached as Schedule 4B.
- 9A. A change of Gambling Area will take effect subject to the Licence Holder providing the Commission and the Inspectorate a minimum of 10 working days prior notice in writing of its intention to adopt one of the approved Gambling Areas referred to in Condition 9 and shown in Schedules 1, 2, 3, 3A, 3B, 4A or 4B.

12. Schedules 1, 2, 3, 3A, 3B, 4, 4A and 4B are **attached**.

Right of appeal

13. 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.

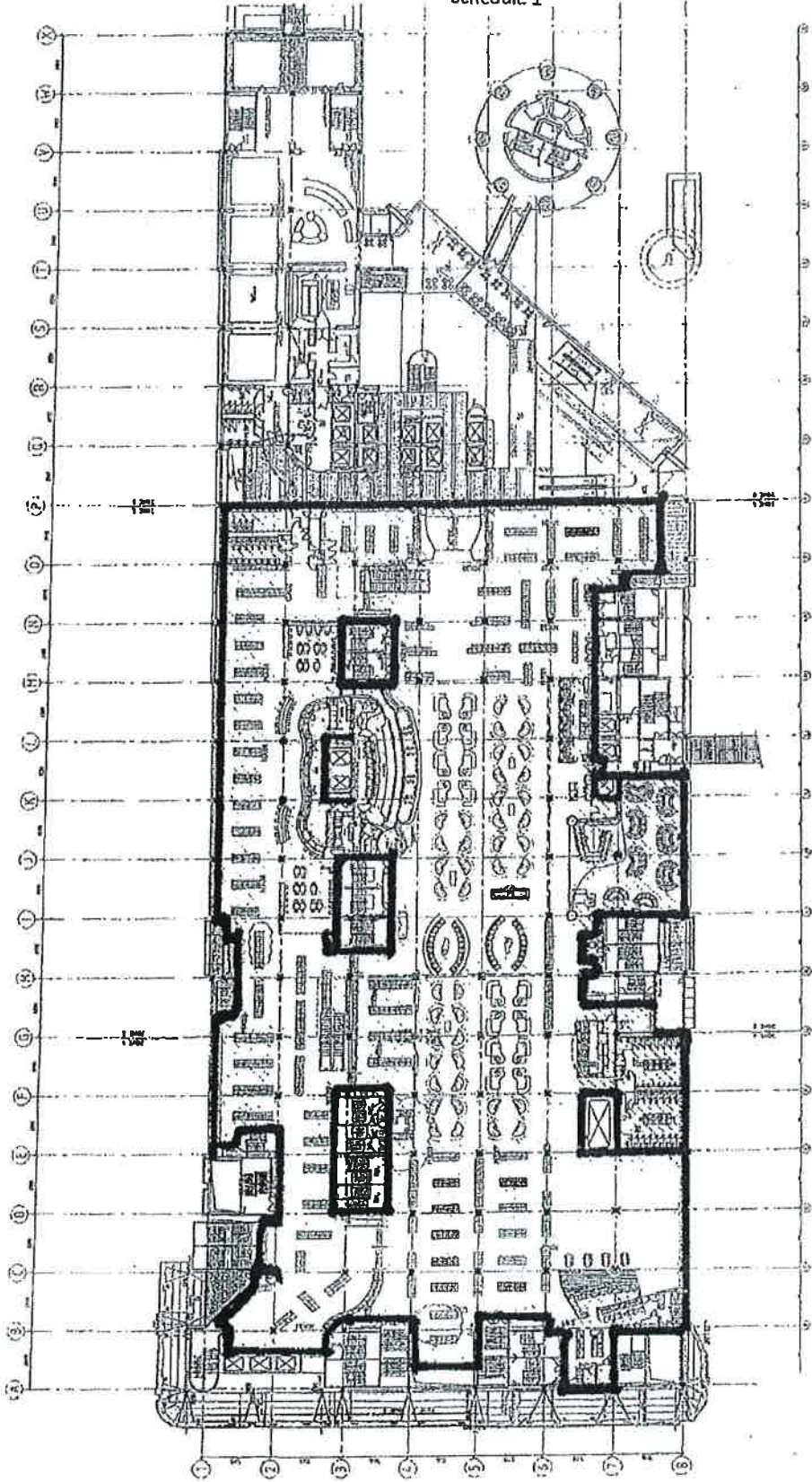

 Graeme Reeves
 Chief Gambling Commissioner

for and on behalf of the
 Gambling Commission

 September 2011



Schedule 1



SCHEDULE

1	ALL GAMING AREAS
2	ALL GAMING AREAS
3	ALL GAMING AREAS
4	ALL GAMING AREAS
5	ALL GAMING AREAS
6	ALL GAMING AREAS
7	ALL GAMING AREAS
8	ALL GAMING AREAS
9	ALL GAMING AREAS
10	ALL GAMING AREAS
11	ALL GAMING AREAS
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14	ALL GAMING AREAS
15	ALL GAMING AREAS
16	ALL GAMING AREAS
17	ALL GAMING AREAS
18	ALL GAMING AREAS

GAMING AREA: 6,023m² (64,851 SQ. FT)



FOR ALL INFORMATION
CONTACT THE ARCHITECT

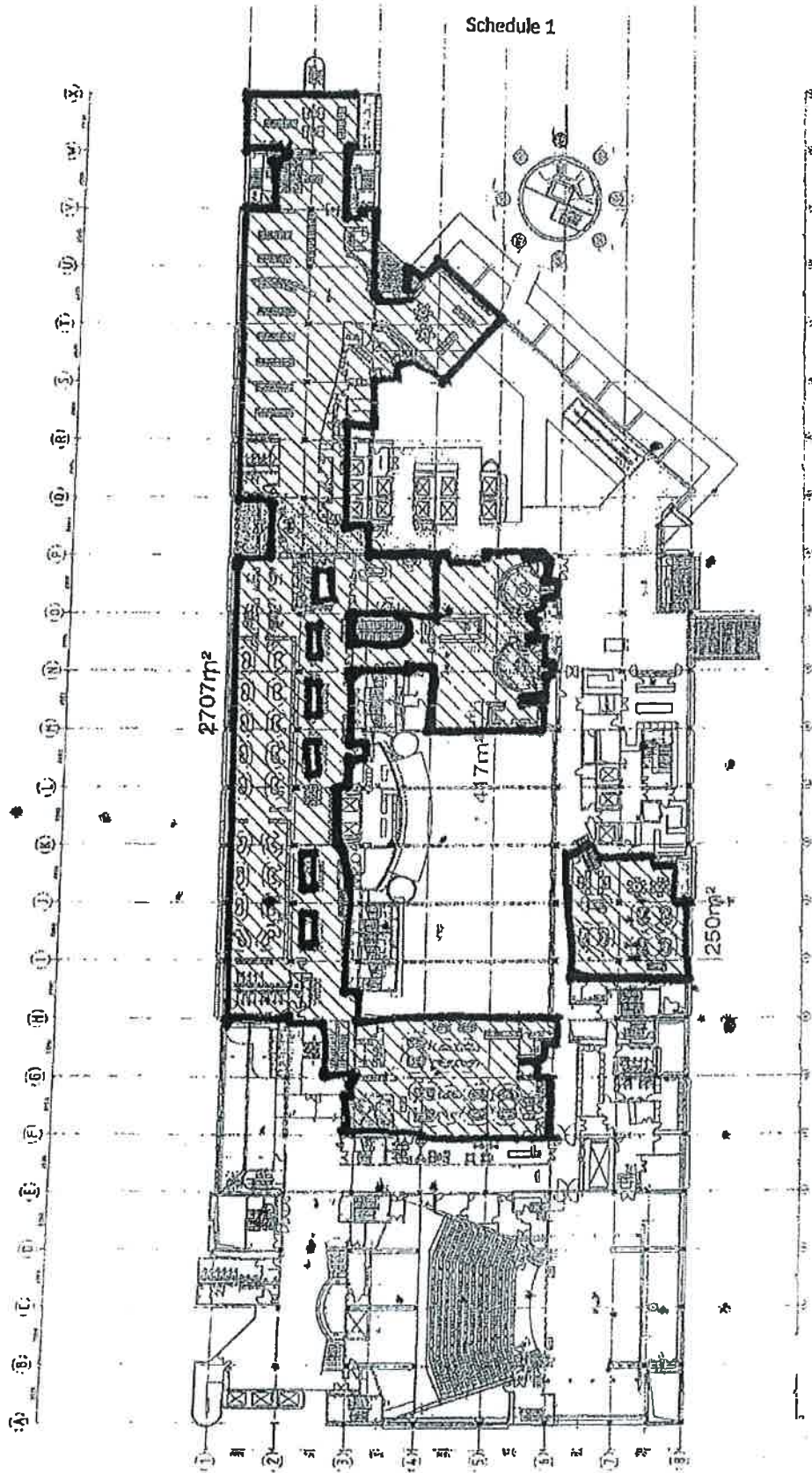
MOLLAR Architects

SKY CITY ENTERTAINMENT GROUP
GAMING LAYOUTS

SKY CITY ENTERTAINMENT GROUP

Level 2 Gaming Layout
SKY CITY
GAMING AREAS

0000 2000



Schedule 1

2707m²

447m²

250m²

Project Name	Level 3 Garring Layout
Client	SKY CITY
Location	Bar 21 - Garring Zone
Scale	1:500
Date	5/26/06
Drawn by	A1203(B)
Checked by	
Approved by	

SKY CITY
 Level 3 Garring Layout
 Bar 21 - Garring Zone

SKY CITY
 Level 3 Garring Layout
 Bar 21 - Garring Zone

SKY CITY
 Level 3 Garring Layout
 Bar 21 - Garring Zone

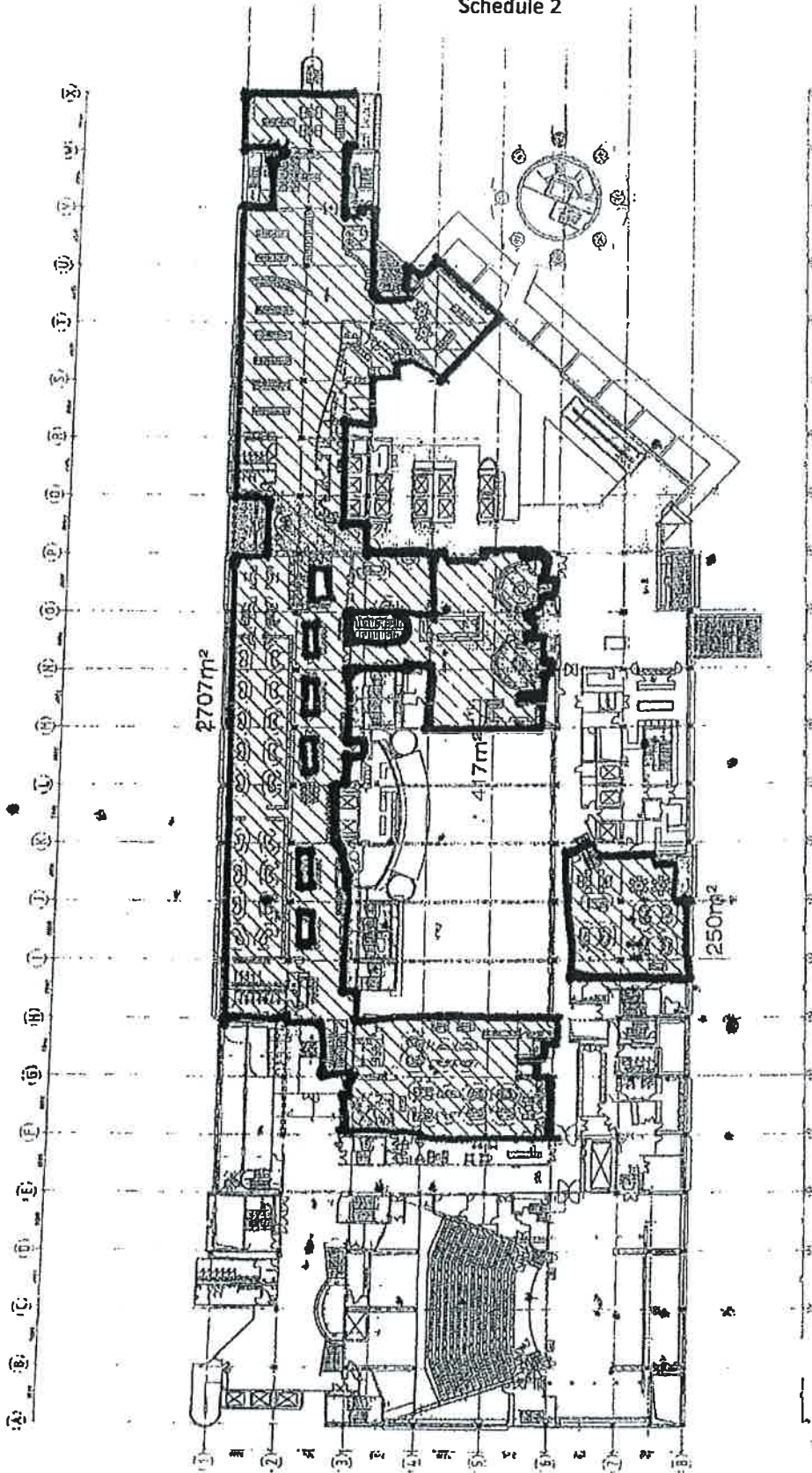
SKY CITY
 Level 3 Garring Layout
 Bar 21 - Garring Zone

SKY CITY
 Level 3 Garring Layout
 Bar 21 - Garring Zone

SKY CITY
 Level 3 Garring Layout
 Bar 21 - Garring Zone



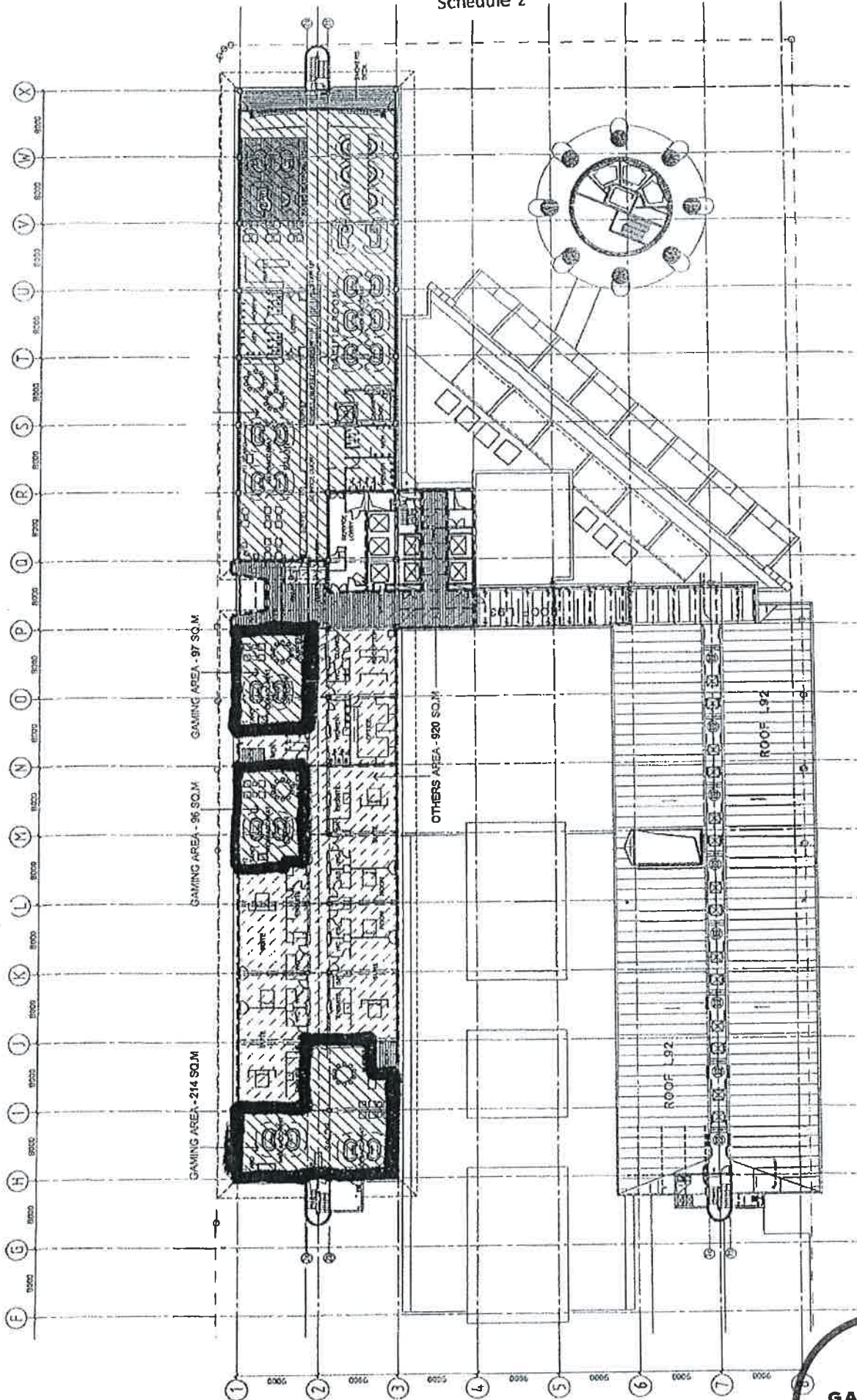
Schedule 2



<p>SKYCITY GAMBLING GROUP</p>		<p>SKY CITY ENTERTAINMENT GROUP GAMING LAYOUTS</p>	
<p>Level 3 Gaming Layout SKYCITY</p>		<p>Plan No. : A1200(B) 01</p>	
<p>Scale: 1:500</p>		<p>Scale: 1:500</p>	
<p>Author: [Name]</p>		<p>Check: [Name]</p>	
<p>Date: [Date]</p>		<p>Date: [Date]</p>	



Schedule 2



NO.	DATE	BY	CHKD.

SKY CITY
 SKY CITY VIP GAMING
 LEVEL H5
 AREAS CALCULATION

1. Refer to Schedule 1 for Overall Gameable Area Calculation and 2. Refer to Schedule 3 for Overall Gameable Area Calculation. The Areas shall be used for the purpose of the overall calculation.

DATE	NO.	BY	CHKD.

Sky City Entertainment Group
 VIP Gaming

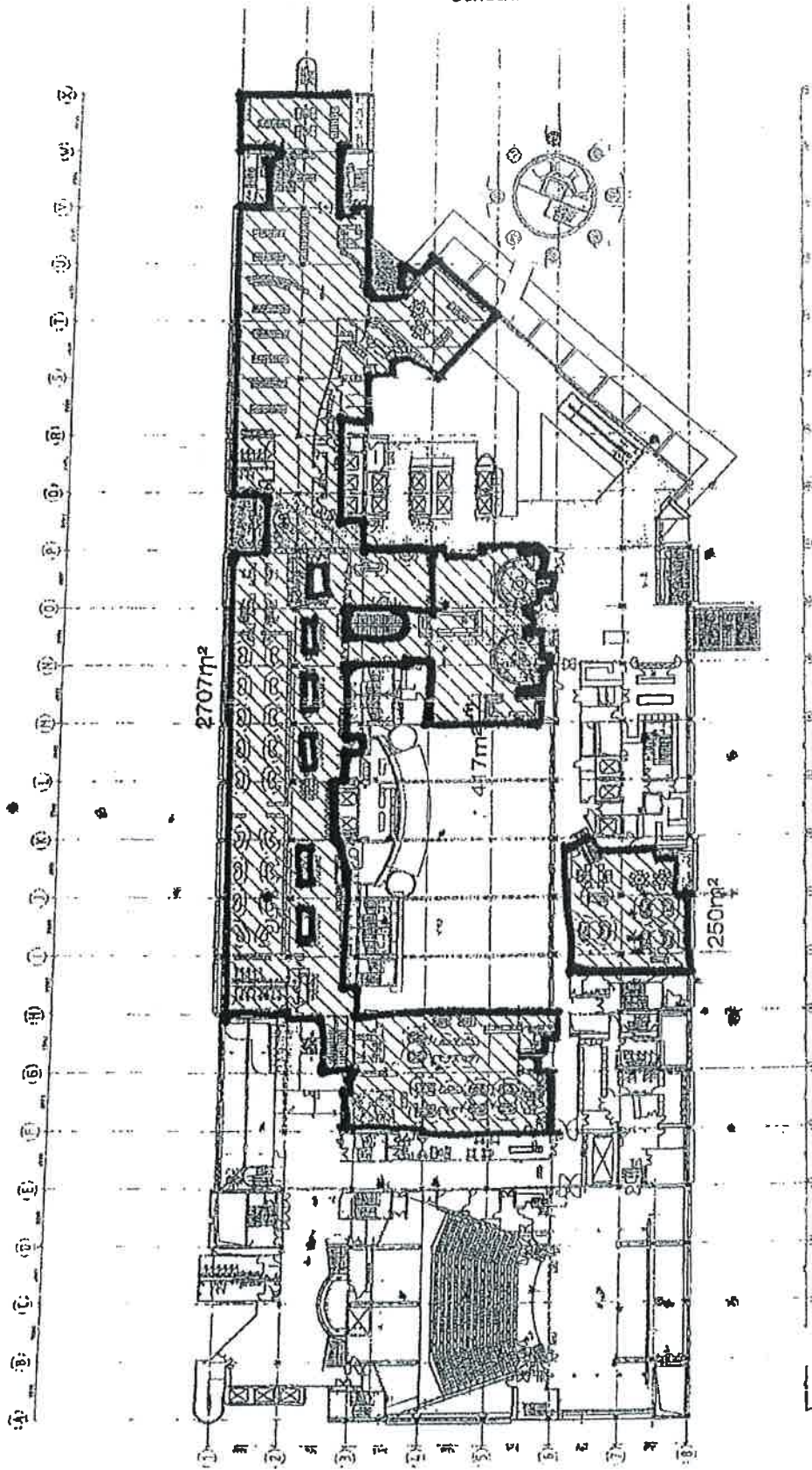


Scale: 1/8" = 1'-0"

Moller Architects



Schedule 3



miller Architects

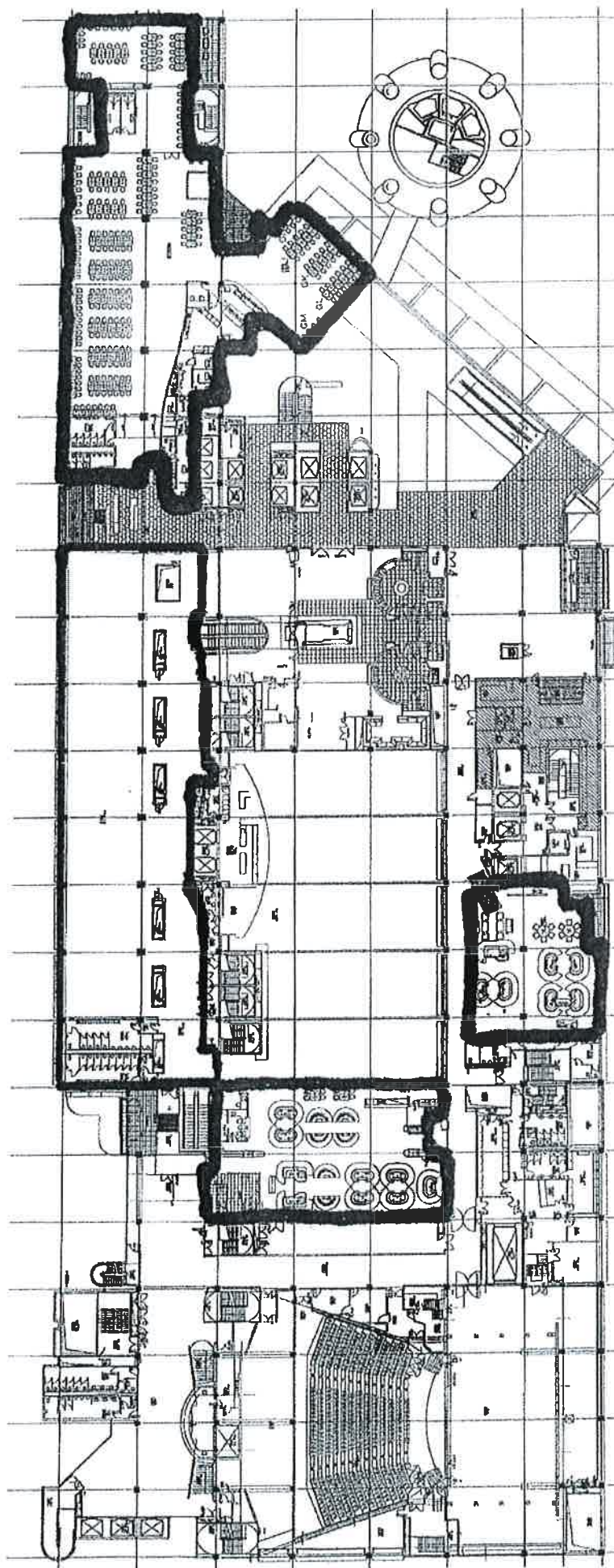
ARCHITECTS
 1000 15th Street, Suite 1000
 Denver, Colorado 80202
 Tel: 303.733.1111
 Fax: 303.733.1112
 www.millerarchitects.com

SKYCITY
 SKY ENTERTAINMENT GROUP

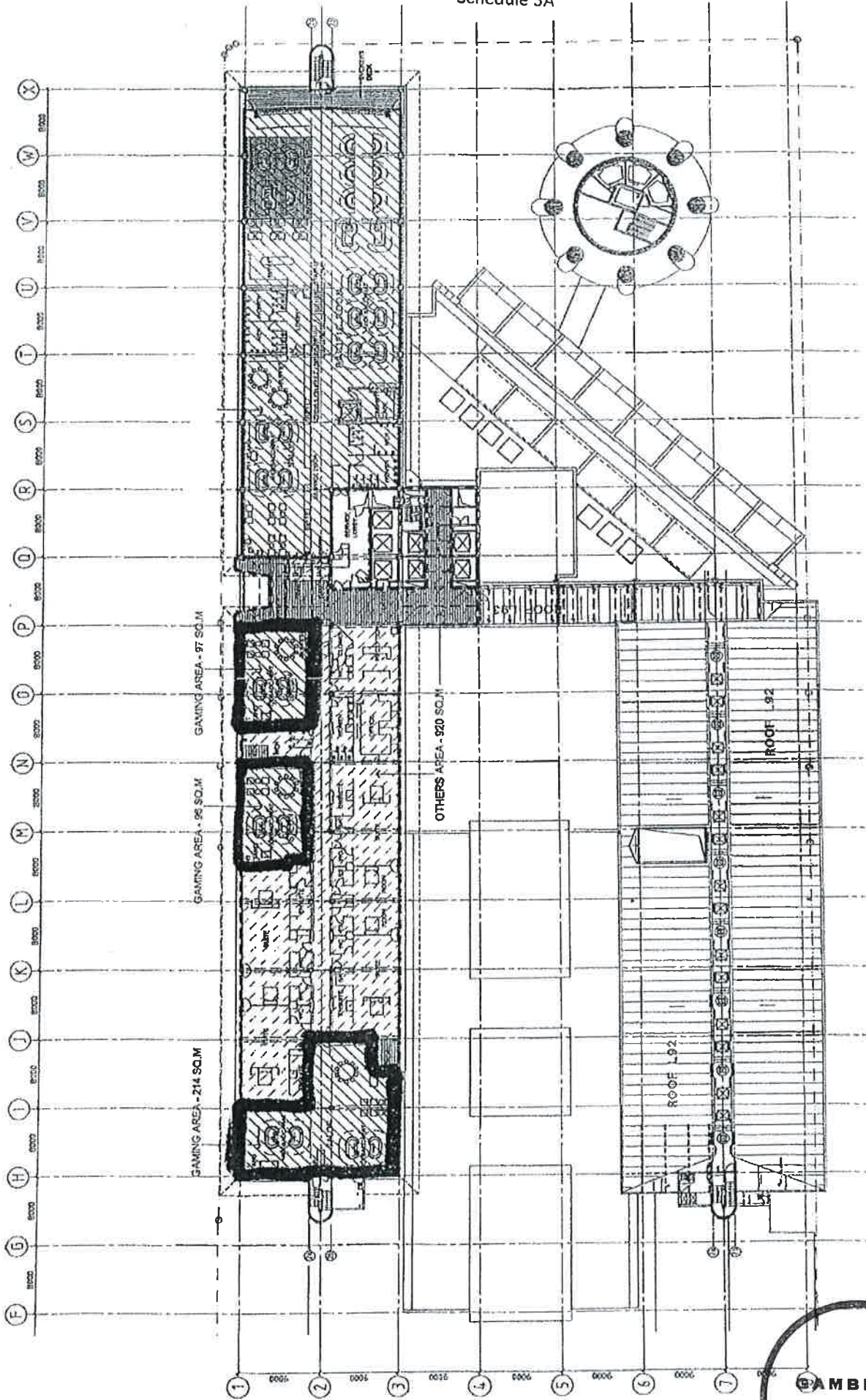
SKY City Entertainment Group
 Gaming Layouts

Level 3 Gaming Layout
 SKYCITY
 BIR-21 - Gaming Zone

5255
 1: A1203(B)
 01



Schedule 3A



NO.	REVISION	DATE
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		

SKYCITY VIP GAMING
LEVEL H5
AREAS CALCULATION

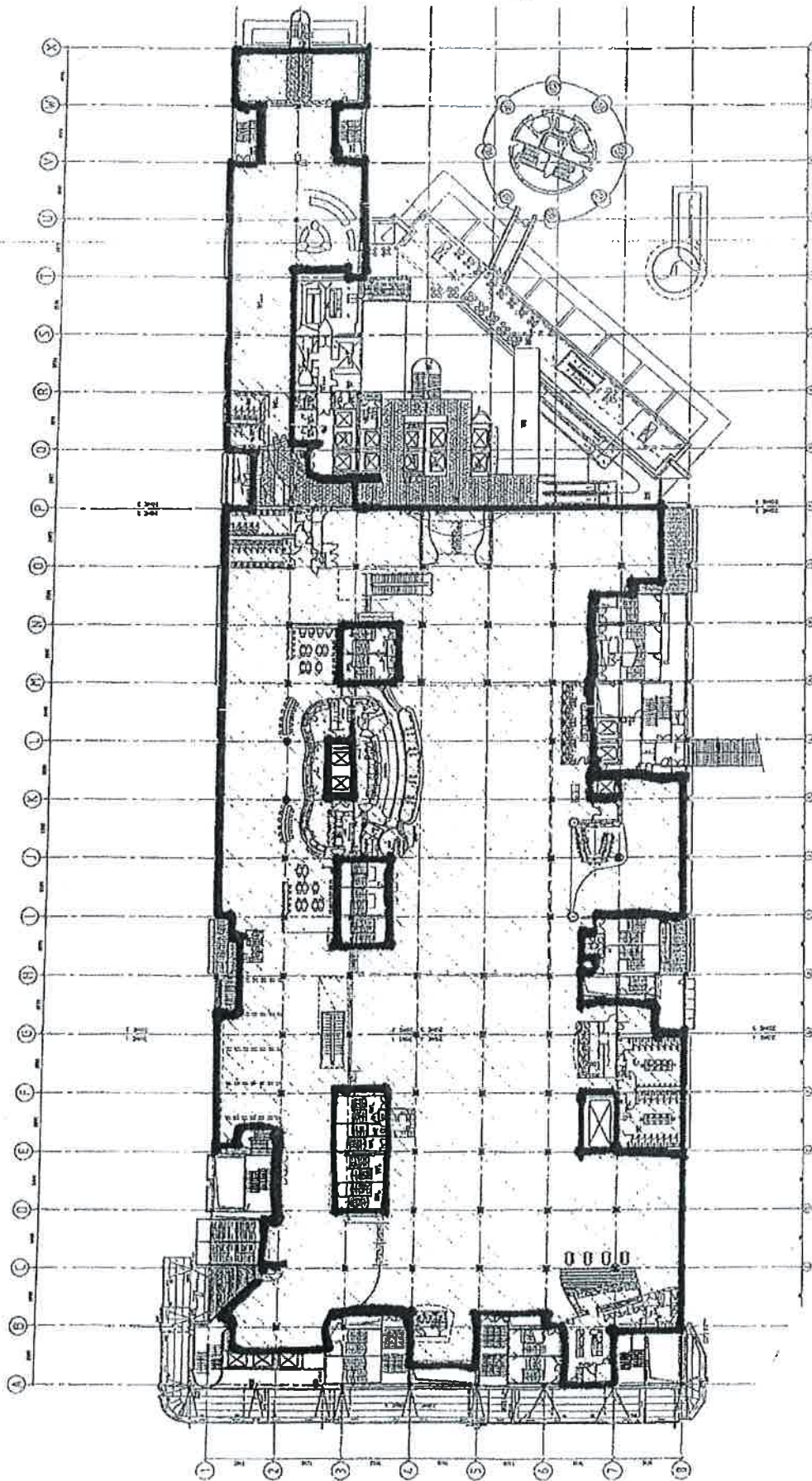
1. Refer to Section 1.0 for Overall Specifications
2. All drawings and work of this project shall conform with the
3. All drawings shall conform with the
4. All drawings shall conform with the
5. All drawings shall conform with the
6. All drawings shall conform with the
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8. All drawings shall conform with the
9. All drawings shall conform with the
10. All drawings shall conform with the

SKYCITY
Sky City Entertainment Group
VIP Gaming

MOELLER
Moller Architects

GAMBLING
COMMISSION

Schedule 3B



GAMING AREA: 6,843m²

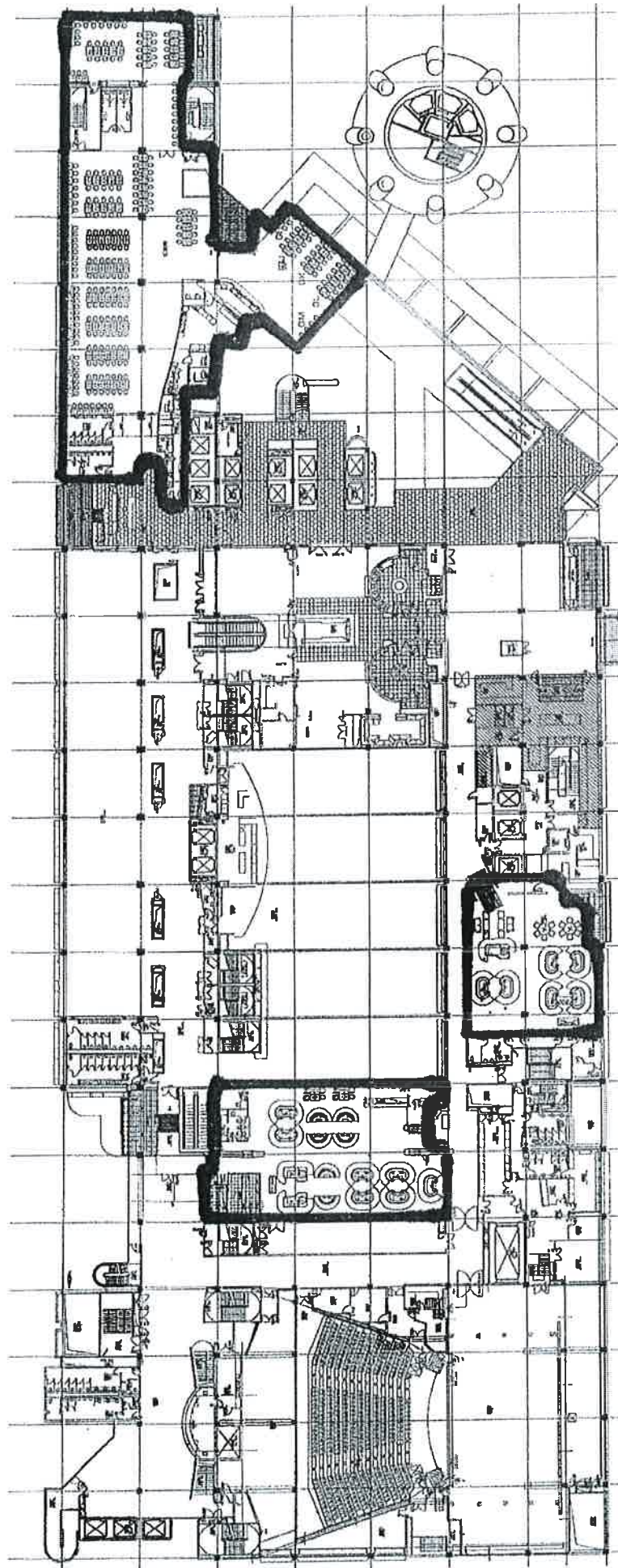


Moller Architects

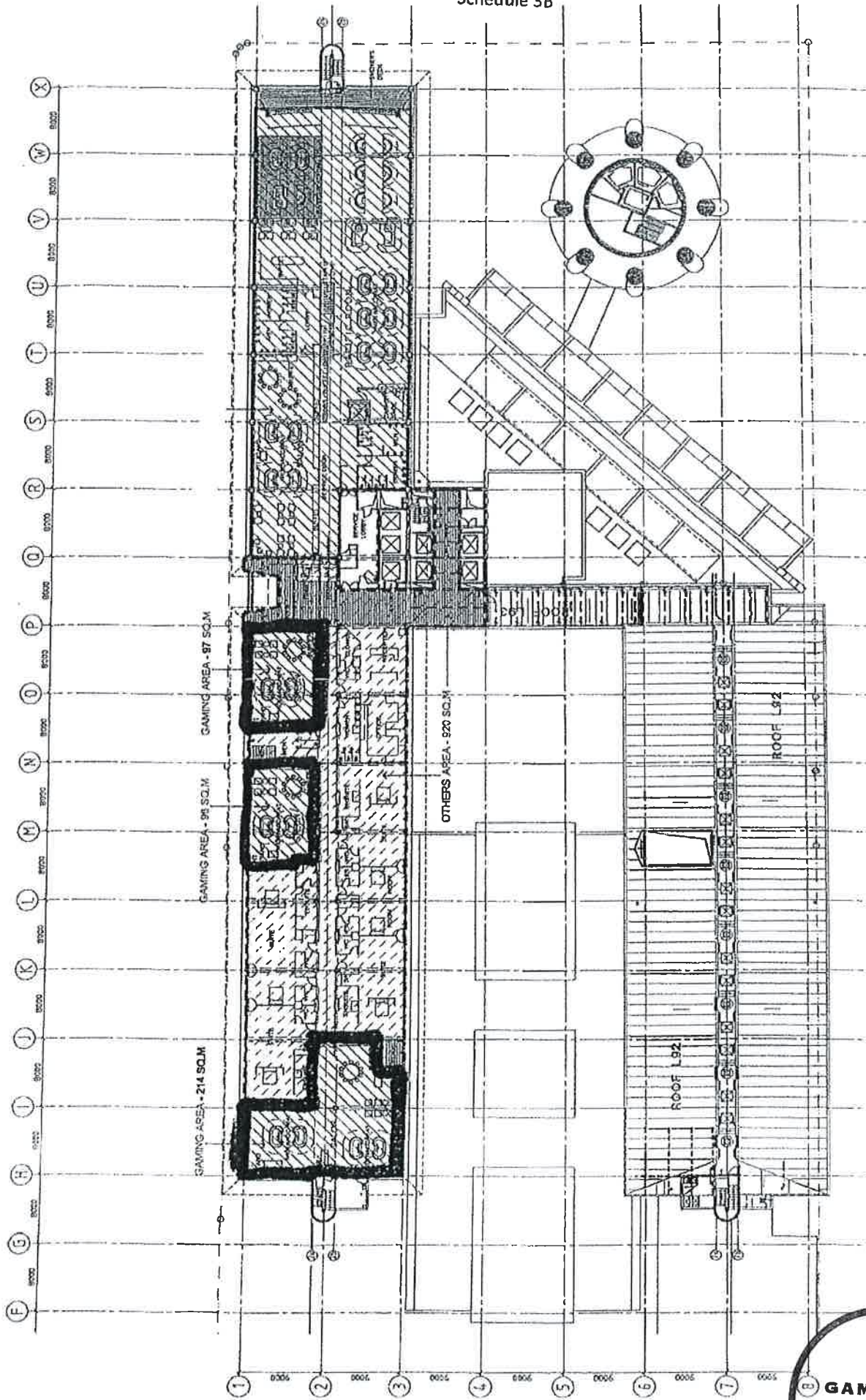


Sky City Entertainment Group

CLIENT: SKY CITY ENTERTAINMENT GROUP PROJECT: SKY CITY - PODIUM LEVEL 2 GAMING AREAS DATE: 10/11/11	
DRAWING NO: AS256 PROJECT NO: PO1121	SHEET NO: 1 TOTAL SHEETS: 1



Schedule 3B



DATE	BY	REVISION

SKYCITY VIP GAMING
LEVEL H5
AREAS CAI ACTION

4. Refer to Schedule 1 for Other Information
Note: Contractor shall verify all dimensions and confirm dimensions
before construction. All dimensions shall be in meters unless otherwise
indicated. All dimensions shall be in meters unless otherwise
indicated. All dimensions shall be in meters unless otherwise
indicated.

PROJECT NO.	
DATE	
BY	
CHECKED BY	
SCALE	

Sky City Entertainment Group
VIP Gaming

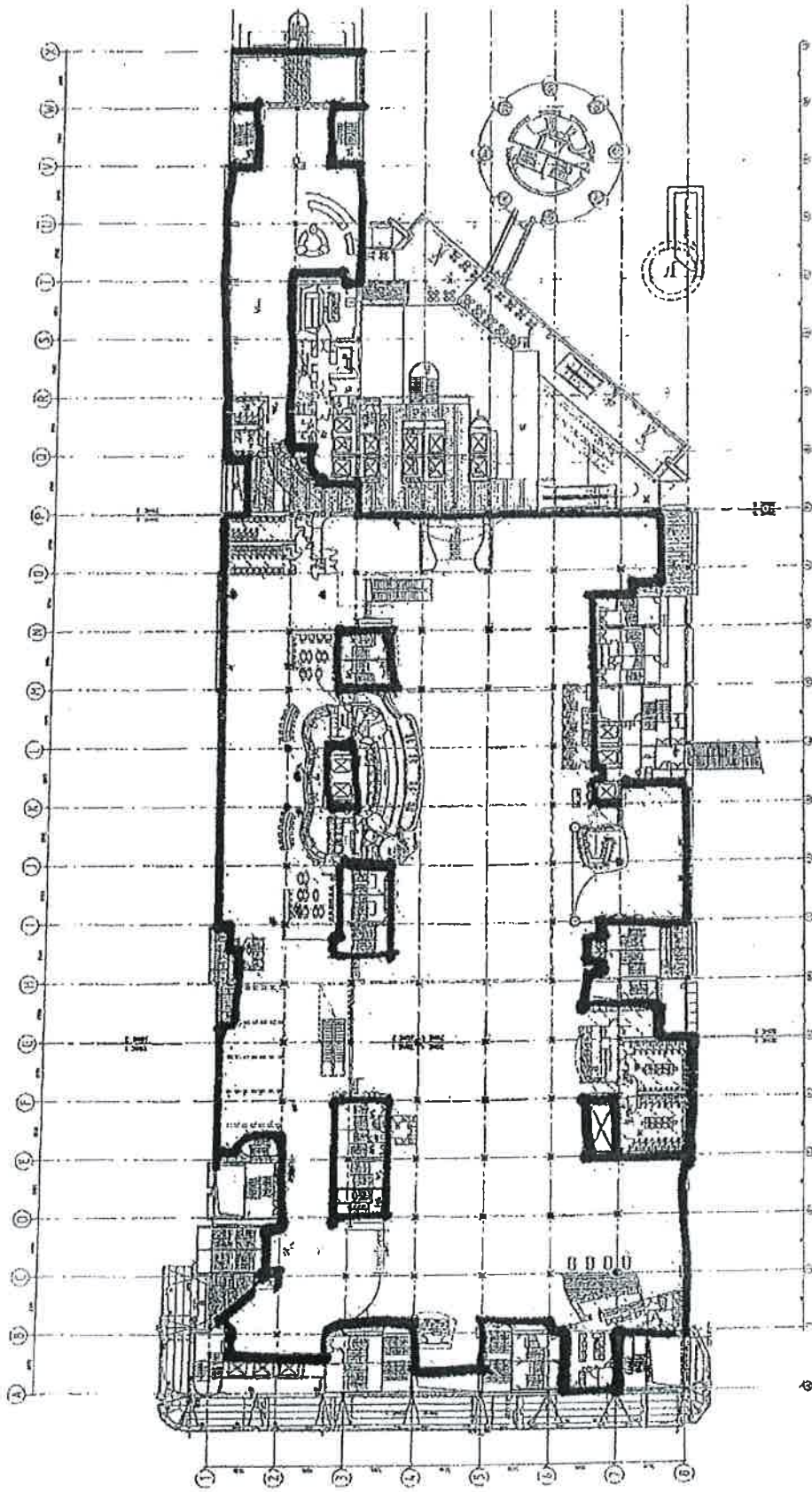


Call: 44 9 2570088
Fax: 44 9 2570088
Level 15, 1500000000
1500000000

Moller Architects



Schedule 4

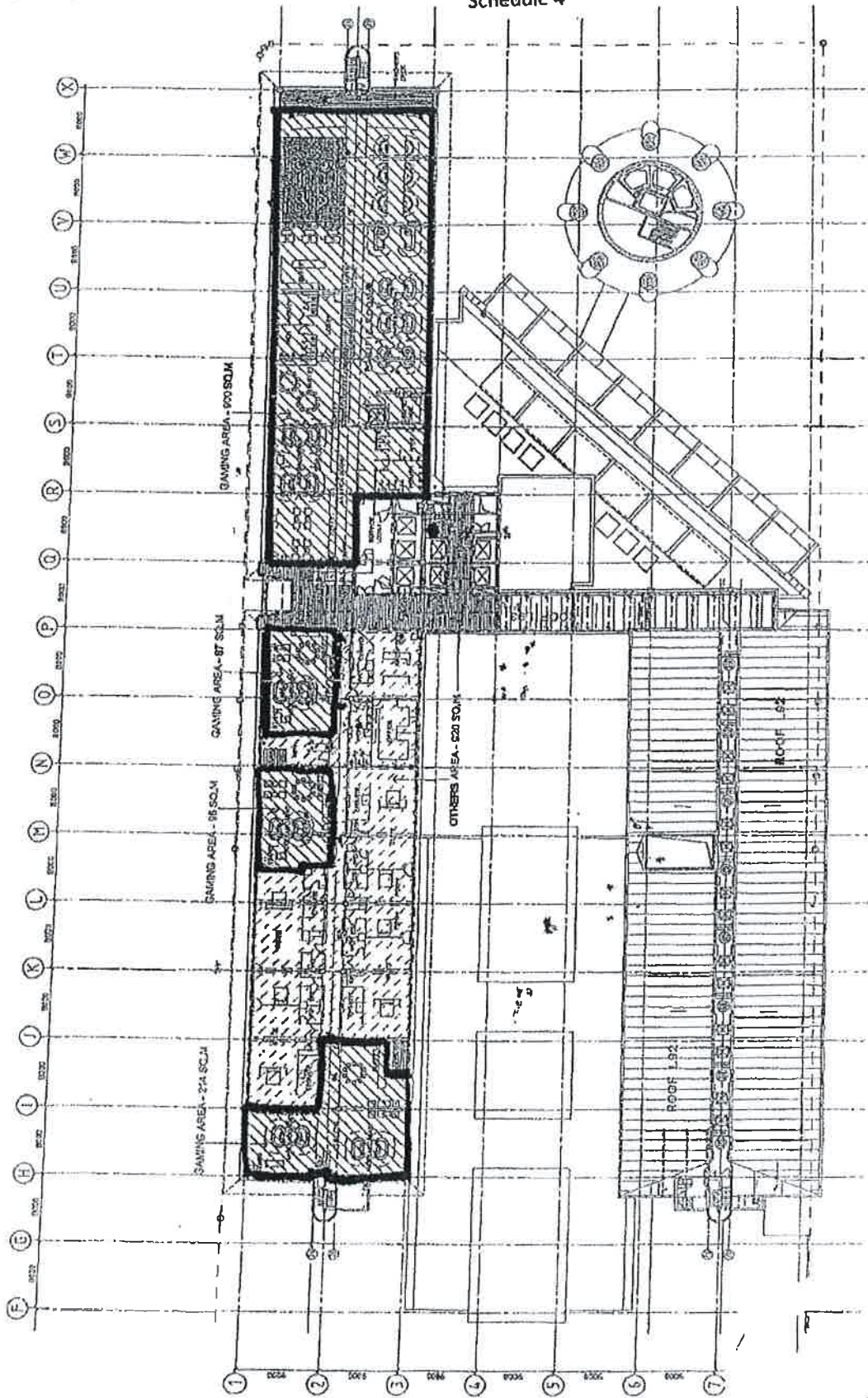


GAMING AREA: 6,845m²



<p>SKY CITY - PODIUM LEVEL 2 GAMING AREAS</p>	
<p>Project Name: SKY CITY - PODIUM LEVEL 2 GAMING AREAS</p>	<p>Project No: A5256</p>
<p>Client: Sky City Entertainment Group</p>	<p>Architect: Moller Architects</p>
<p>Scale: 1:500</p>	<p>Date: 11/11/11</p>
<p>Author: [Name]</p>	<p>Checker: [Name]</p>
<p>Project Manager: [Name]</p>	<p>Project No: PD1121</p>

Schedule 4



PROJECT NO.	AS285
DATE	12/2012
SCALE	AS SHOWN
DRAWN BY	AS285
CHECKED BY	
APPROVED BY	

SKY CITY VIP GAMING
LEVEL H6
AREA'S CALCULATION

DATE: 12/2012

PROJECT: SKY CITY

AREA: SKY CITY

SCALE: AS SHOWN

DRAWN BY: AS285

CHECKED BY:

APPROVED BY:

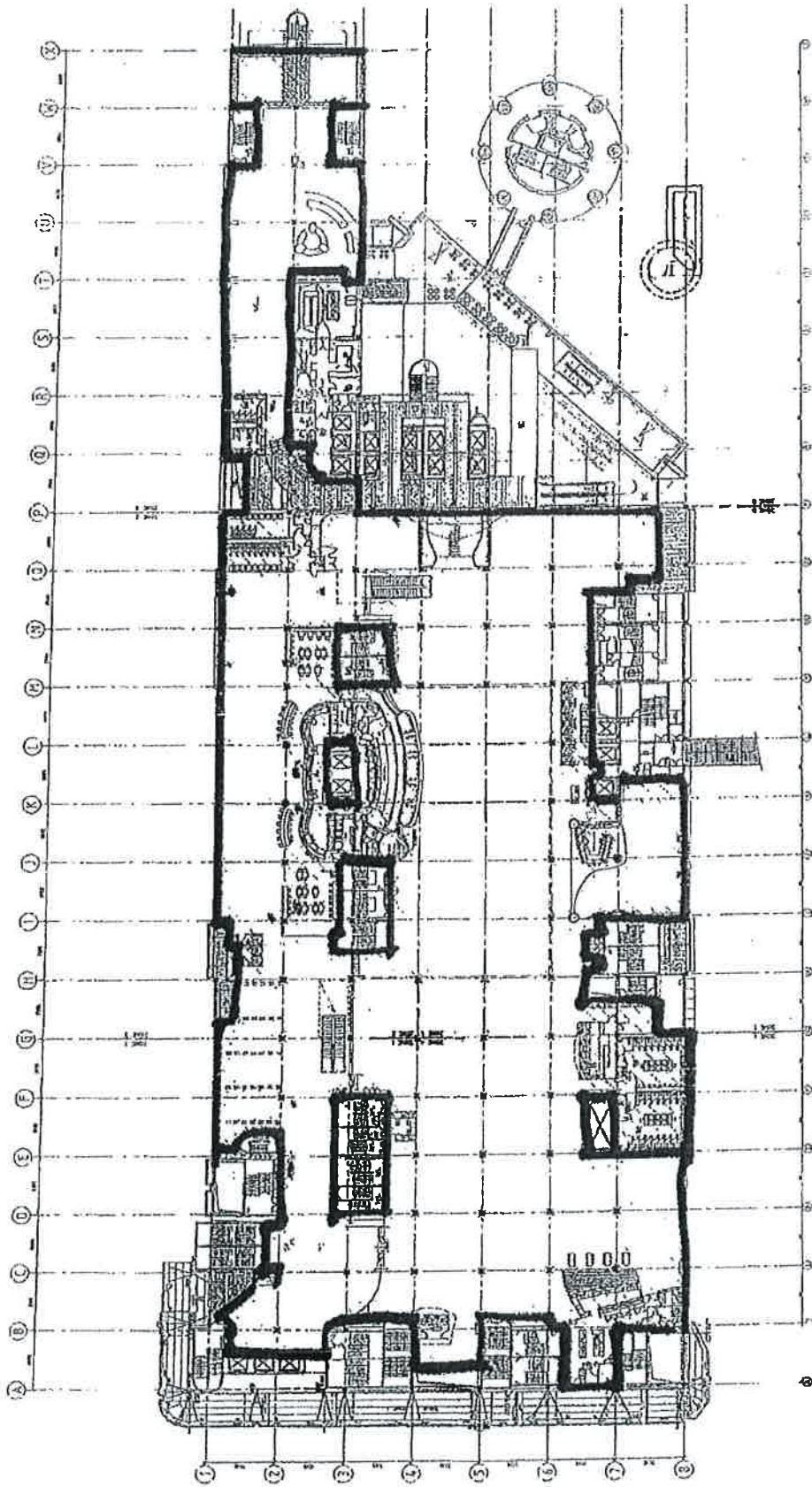
SKY CITY
Entertainment Group
VIP Gaming

SKY CITY
Entertainment Group

Moller Architects



Schedule 4A



GAMING AREA 8,843m²



PROJECT NO.	AS256	PD1121
DATE		
SCALE		
DESIGNER		
CHECKED		
APPROVED		

SKY CITY - PODIUM
LEVEL 2
GAMING AREAS

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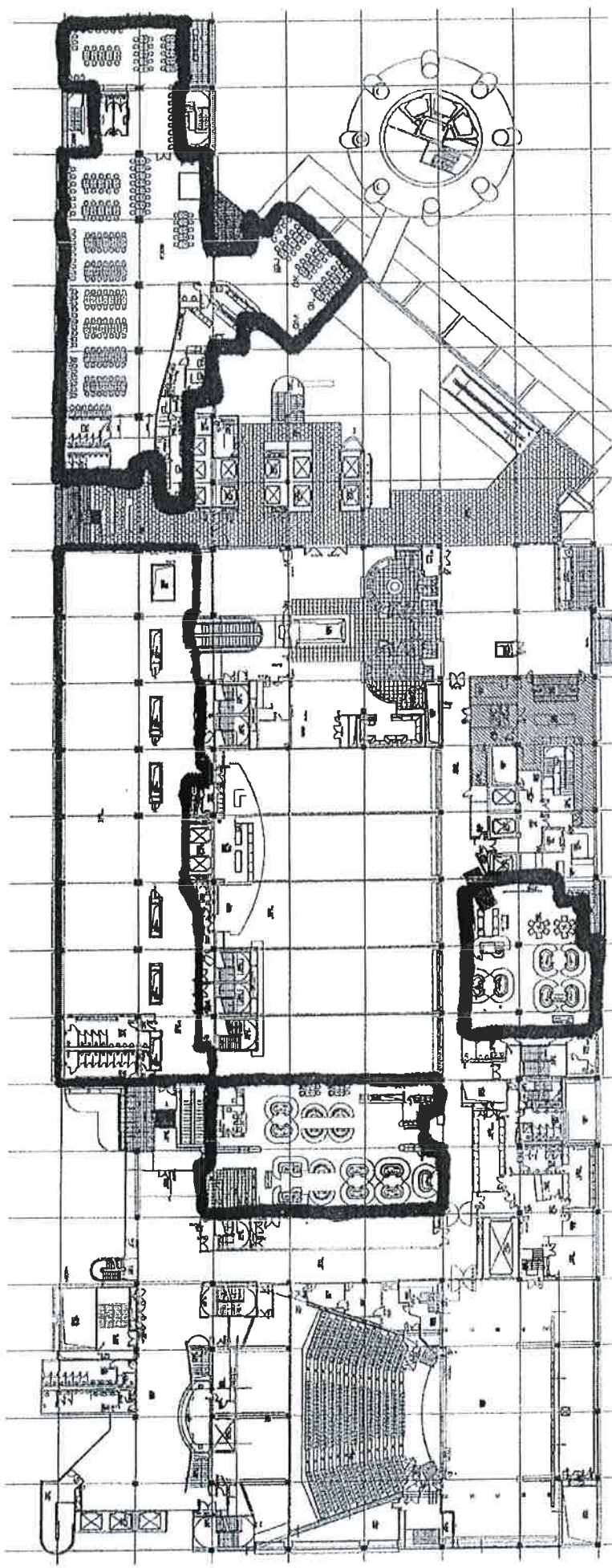
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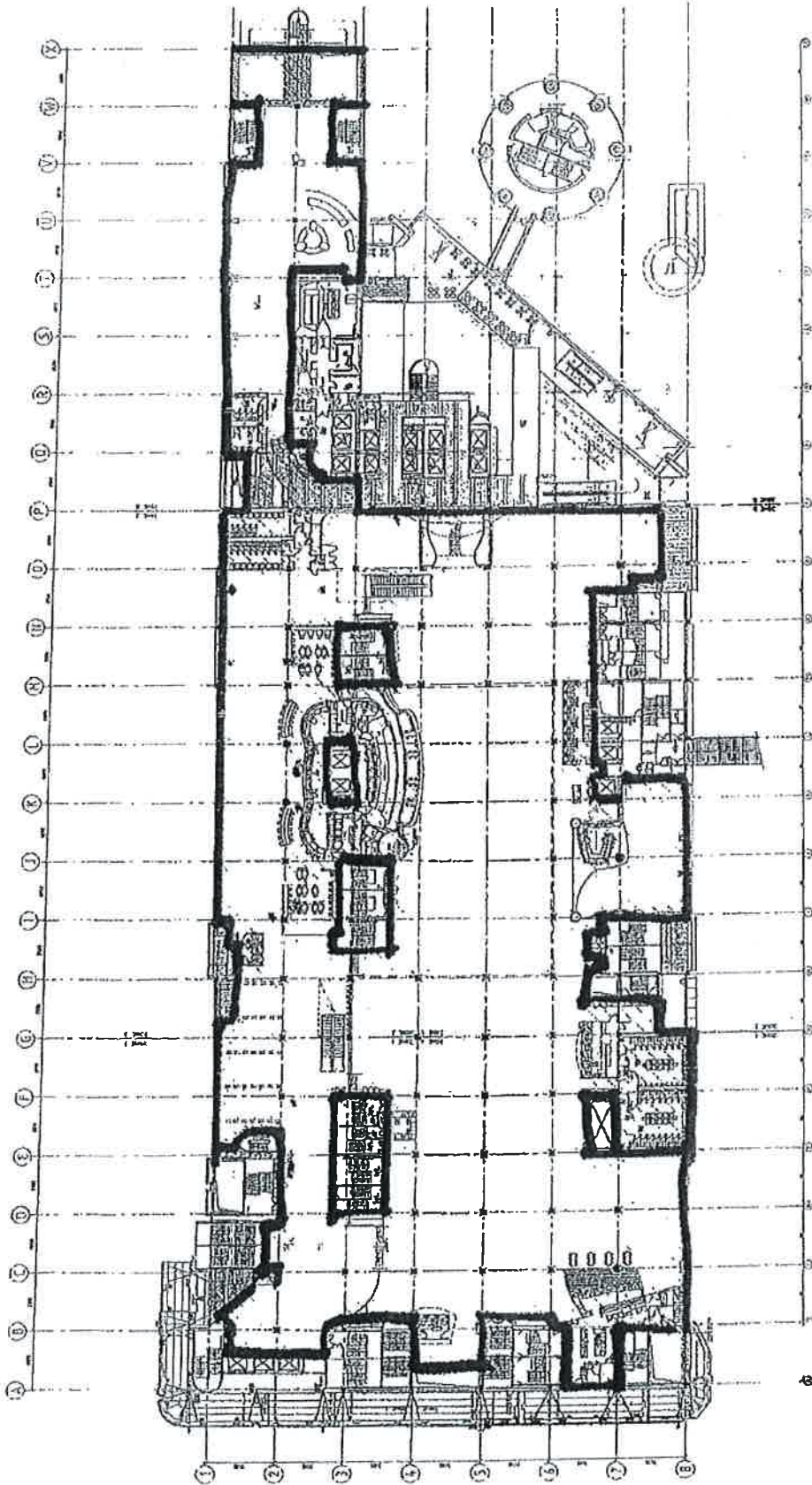
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Schedule 4B



GAMING AREA: 6,848m²



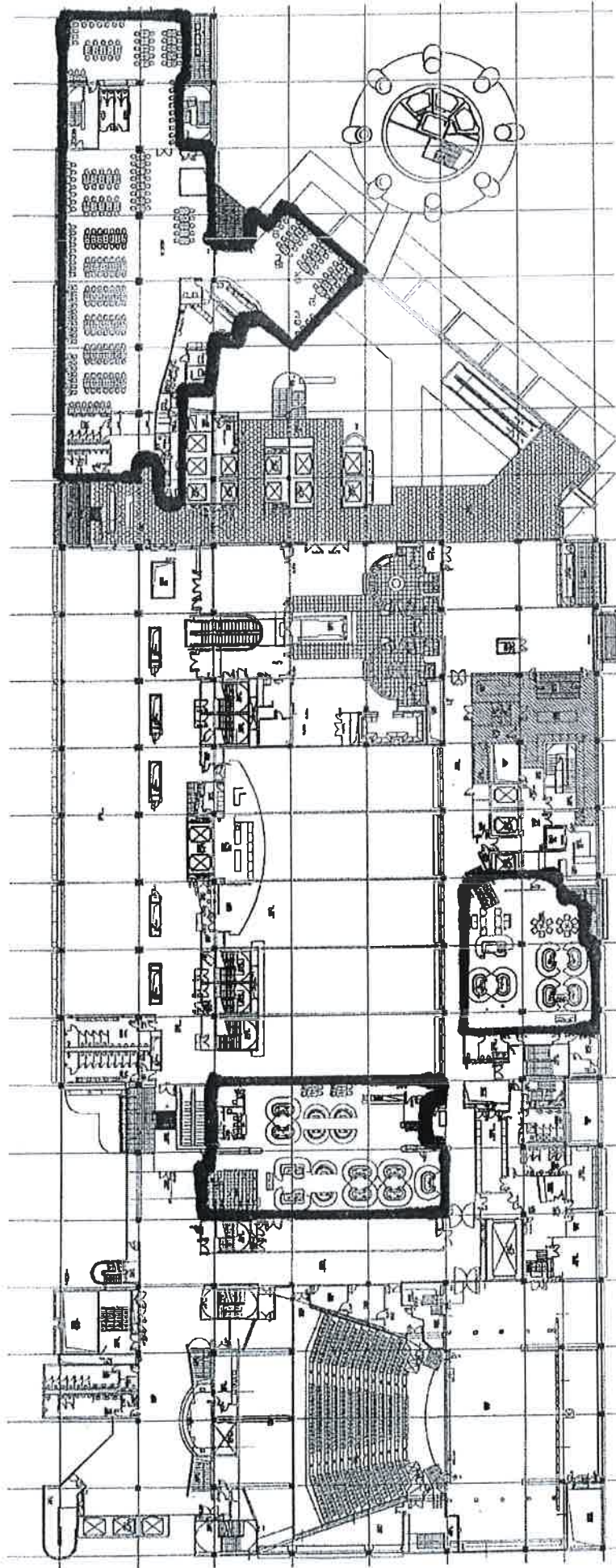
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 Fax: 303.733.1112
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Sky City Entertainment Group
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 Fax: 303.733.1112
 Website: www.skycity.com

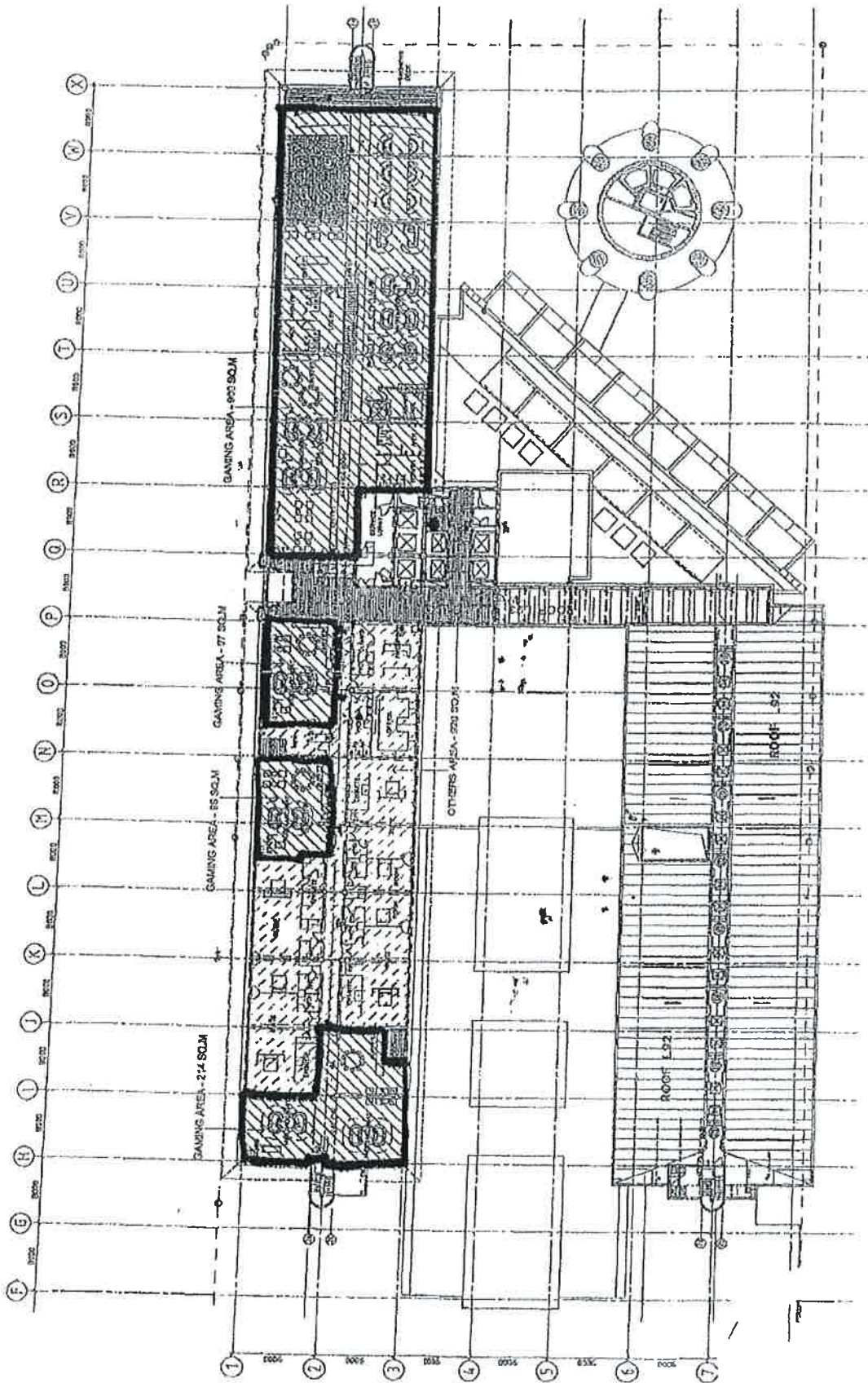
SKY CITY
 ENTERTAINMENT GROUP

SKY CITY - PODIUM LEVEL 2 GAMING AREAS

AS236 PD1121



Schedule 4B



PROJECT NO.	1000000000
DATE	11/13/20
SCALE	AS SHOWN
BY	AS285
CHECKED BY	AS285
DATE	11/13/20

SKYCITY VIP GAMING
LEVEL H5
AREAS CALCULATION

1. I, [Name], [Title], of [Firm Name], do hereby certify that the above is a true and correct copy of the original as shown on the drawings and specifications for the project identified above.
[Signature]

DATE	11/13/20
BY	AS285
CHECKED BY	AS285
DATE	11/13/20

SKY CITY ENTERTAINMENT GROUP
VIP GAMING

MOJER ARCHITECTS

Moller Architects

