



**Hampshire Constabulary**  
Chief Constable Andy Marsh

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28<sup>th</sup> July 2014

Dear Licensing Department

Representation by Hampshire Constabulary in respect of applications to Southampton City Council Under the Gambling Act 2005 for the Provisional Statements in Respect of a Large Casino Licence.

This representation is made under section 161 of the Gambling Act 2005 in respect of the following applications,

- 1 - Kymeira Casino Ltd of Eversheds House, 70 Great Bridgewater Street, Manchester M1 5ES in respect of a Large Casino Licence to be situated at the proposed Royal Pier development on a site bounded by Town Quay road, Town Quay pier, Mayflower Park and the river Test, accessed from Town Quay Southampton.
- 2 - Global Gaming Ventures (Southampton) Ltd, of 11 John Princes Street, London W1G 0JR in respect of a Large Casino Licence to be situated at the Watermark West Quay scheme, to be located on a development to the south of the West Quay Shopping Centre bordered by Western Esplanade and Harbour Parade Southampton.
- 3 - Global Gaming Ventures (RP) Ltd, of 11 John Princes Street London W1G 0JR, in respect of a Large Casino Licence to be located on existing and reclaimed land situated to the south of Town Quay and east of Mayflower Park known as the Royal Pier Waterfront Southampton SO14 2AQ.
- 4 - Genting Casinos UK Ltd, of Genting Club Star City, Watson Road, Birmingham B7 5SA in respect of a Large Casino Licence to be constructed on a plot of land to be reclaimed from the River Test (and expected to be situated at building identified as RP2), Royal Pier Waterfront, Mayflower Park, Southampton, SO14 2AQ.

I have examined these applications in full and understand that the Council are currently at stage 1 in this application process. I also understand that this stage requires the applicants to demonstrate to the Licensing Committee that they are "fit and proper" persons to potentially be awarded the licence. With this in mind I have the following observations to make regarding these applications.



## Hampshire Constabulary Chief Constable Andy Marsh

Firstly, the following applicants do not appear to be holders of an operating licence issued by the Gambling Commission. I see this as a fundamental requirement as it demonstrates acceptance by a regulatory body and demonstrates a degree of responsibility. The applicants that are affected by this are Kymeira Casino Ltd, Global Gaming Ventures (Southampton) Ltd and Global Gaming Ventures (RP) Ltd.

I do note that the application published on your website is rather basic and perhaps some of the required information is not directly asked for. However, point 19 on the application does ask for any further information that may be relevant to the application and it is here that I would have expected to see reference to the applicants Codes of Practise, Operating Procedures or a Responsible Gambling Policy which cover the statutory gambling objectives and specifically to "protecting children and other vulnerable persons from being harmed or exploited by gambling".

This brings me to my second observation in that all four of the above applicants have failed to provide any evidence that might convince the Licensing Committee that they are in fact fit and proper to hold such a licence. They make no reference to any age verification schemes such as Challenge 25 and no mention of what forms of identification will be accepted. There is no evidence as to how the applicants will protect children and other vulnerable persons from being harmed or exploited by gambling.

I find that this omission is rather surprising considering the nature and expense of what the applications are for and the fact that they are trying to demonstrate that they are suitable to hold the licence. However, as a responsible authority, it is an area that I look to see being covered and in these applications it isn't. Therefore I ask the Licensing Committee to reject these applications for a provisional statement.

If the applicants were to submit a robust and acceptable policy or policies detailing how they propose to comply with this specific gambling objective, Hampshire Constabulary would be prepared to withdraw its representation.

Yours Faithfully



PS 2117 Wood  
Alcohol Harm Reduction and Licensing Team

## LEGAL &amp; DEMOCRATIC SERVICES

**RICHARD IVORY, Solicitor,**  
**Head of Legal and Democratic Services**  
**Southampton and Eastleigh Licensing Partnership**

Southampton City Council  
 Licensing Services  
 Civic Centre  
 Southampton SO14 7LY

Please address all correspondence to:  
**Licensing – Southampton City Council,**  
**PO Box 1767, Southampton, SO18 9LA**



Direct dial: 023 8083 3523  
 Our ref: PB/2014/02566/70SLCP  
 Your ref:

E-mail: phil.bates@southampton.gov.uk  
 Please ask for: Mr. Bates

The Licensing Team  
 Southampton and Eastleigh Licensing Partnership  
 Civic Centre  
 Southampton SO14 7LY

21 July 2014

Dear Sir,

**GAMBLING ACT 2005 – GLOBAL GAMING VENTURES (SOUTHAMPTON) LTD., WEST QUAY WATERMARK REPRESENTATION IN RESPECT OF APPLICATION FOR A LARGE CASINO PROVISIONAL STATEMENT**

This is a representation under section 161 of the Gambling Act 2005 by Southampton City Council, as a responsible authority under section 157(a) of the Gambling Act 2005, in respect of an application by Global Gaming Ventures (Southampton) Ltd., of 11 John Princes Street, London W1G 0JR for a Provisional Statement in respect of a Large Casino Licence to be situated at the Watermark West Quay scheme, to be located on land to the south of the West Quay Shopping Centre bordered on the east by the Western Esplanade and on the west by Harbour Parade (on the site of the former Pirelli factory), Southampton.

I have examined this application in detail, which is at stage 1 of the process. This requires an applicant to demonstrate to the Licensing Authority that they are a "fit and proper" person to potentially be awarded the licence.

I understand that the applicant, Global Gaming Ventures (Southampton) Ltd. does not hold an operating licence issued by the Gambling Commission; however the application published on the City Council's website is very basic and, when referring in general to the statutory gambling objectives and specifically to:

- *Protecting children and other vulnerable persons from being harmed or exploited by gambling*

the applicant has failed to provide any evidence which might satisfy the Licensing Committee that they are fit and proper to hold such a licence. There is no reference to a "Challenge 21" or similar policy, and no mention as to what forms of identity might be acceptable as proof of age. There is no evidence as to how the applicant will protect children and other vulnerable persons from being harmed or exploited by gambling.

The applicant has also failed to produce their responsible gambling policy, assuming that one exists.

On behalf of Southampton City Council as Responsible Authority, I would therefore ask the Licensing Committee to reject this application for a provisional statement.

If the applicant were to submit a robust and acceptable policy or policies detailing how they propose to comply with this specific gambling objective, Southampton City Council would be prepared to withdraw its representation.

Yours faithfully,

  
 Licensing Manager  
 for Head of Legal and Democratic Services



SCC-RA-rep-GGV(Southampton)Ltd

**If you require this letter or future correspondence from us in a different format (e.g. tape, Braille or disc) please do not hesitate to let us know.**