



City of Westminster

Executive Summary and Recommendations

Licensing Sub-Committee Report

Date: 10th September 2015

Subject: Application for variation of the Casino Premises Licence under the Gambling Act 2005 for The Hippodrome Casino, 10-14 Cranbourn Street, London, WC2H 7JH

Summary

To consider and determine the application made by Hippodrome Casino Ltd for variation of the Casino Premises Licence under Section 187 of the Gambling Act 2005.

Options for Members

After considering the application and the submissions from the applicant and the objectors in accordance with paragraph 163 (1) of the Gambling Act 2005 the Licensing Sub Committee can either:

- 1) grant the application
- 2) refuse the application



City of Westminster

Licensing Sub-Committee Report

Item No:	
Date:	10 th September 2015
Licensing Ref No:	15/04522/LIGV
Title of Report:	Application for variation of the Casino Premises Licence under the Gambling Act 2005 for The Hippodrome Casino, 10-14 Cranbourn Street, London, WC2H 7JH
Report of:	Director of Public Protection and Licensing
Wards involved:	St James's
Policy context:	Westminster City Council's Statement of Principles under the Gambling Act 2005
Financial summary:	None
Report Author:	Steve Rowe – Senior Licensing Officer
Contact details	Tel: 020 7641 7825 E-mail: srowe@westminster.gov.uk

1. Background Information

- 1.1 An application was received to vary the layout of the premises at The Hippodrome, 10 - 14 Cranbourn Street, London, WC2H 7JH. The application has been made under Section 187 of the Gambling Act 2005 (2005 Act). A copy of the application form is attached to this report at **Appendix A1**.
- 1.2 The premises consist of a four storey building operating on each floor. The premises are currently licensed as a casino under the Gambling Act 2005, regulated entertainment, the sale by retail of alcohol and late night refreshment under The Licensing Act 2003, and relevant entertainment under the Local Government (Miscellaneous Provisions) Act 1982. A copy of the current gambling premises licence is attached at **Appendix A2**.
- 1.3 The applicants have also applied for a new betting shop in the foyer of the casino (15/03306/LIGN). This variation application seeks to de-licence the foyer area of the casino licence to allow provisions for the new betting shop.
- 1.5 The proposed plans are attached to this report at **Appendix A3**.

2. Premises in the Vicinity

- 2.2 There are 13 faith groups located within a 500 metre radius from this premises. The nearest place of religious worship is the Notre Dame de France.
- 2.3 There is one school within 500 metres of the premises from this premises. The nearest school is The Soho Parish C of E Primary School.
- 2.4 There are 29 licensed gambling premises within a 500 metre radius of these premises ([see Appendix D](#)).

3. Consultation

- 3.1 The application was advertised in accordance with the Gambling Act 2005 (Premises Licence and Provisional Statement) Regulations 2007 both on the premises and in the local press. The 28 day consultation period started from the date the application was received.
- 3.2 Local residents and businesses within a 30 metre radius of the proposed premises were written to outlining the application and how they can make representations to the Authority within the statutory period.
- 3.3 Letters were also sent to each of the Ward Councillors who's Wards are subject to these applications advising them of the application.

4. Representations

- 4.1 On the 2nd July 2015 a representation was received from the Licensing Authority. A copy of his representation is attached to this report at **Appendix B1a**. The main points of the representation are:
- 4.1.1 The application will not meet the requirements of the Mandatory Conditions for Converted Casino Premises Licences.
 - 4.1.2 The application is not reasonably consistent with the Licensing Objectives
 - 4.1.3 The application is not in accordance with the Gambling Commissions Codes of Practice and Guidance to licensing Authorities; and that it also isn't in accordance with the Council's Statement of Licensing Principles for Gambling.
- 4.2 On the 2nd September the Licensing Authority met with the applicant and their representatives to further discuss the application. On the 3rd September the Licensing Authority submitted further submissions in relation to their representation. A copy of this submission is attached to this report at **Appendix B1b**.

5. Applicant Submission

- 5.1 The applicants and the Licensing Authority arranged a meeting at the premises on the 1st September 2015 to discuss both applications. At the time of publishing the report no additional information had been provided.
- 5.2 The applicants have provided submissions in relation to the new betting shop application.

7. The Gambling Act 2005

- 7.1 This application has been made under section 187 of the Gambling Act 2005. The application is to vary the layout of the premises to de-licence the foyer area.
- 7.2 The Licensing Authority must under Section 153(1) of the Act exercise its functions relating to premises licensing with an aim to permit the use of the premises for gambling in so far as it thinks fit and in accordance with the relevant codes of practice, guidance, reasonably consistent with the licensing objectives and in accordance with the Council's Statement of Principles.
- 7.3 The Licensing Authority can take into account a representations relating to an application for a premises licence from either an interested party (a person living sufficiently close to the premises to be likely to be affected by the authorised activity or has a business interest that may be affected or represents persons in either of these two groups) or a responsible authority (Licensing Authority, Gambling Commission, Police, Fire Authority, Environmental Health and HM Revenue and Custom). Any representations must be relevant and not frivolous or vexatious.

- 7.4 *Section 152 of the Act provides that a premises licence may not be issued in respect of premises if a premises licence already has effect in relation to the premises, except for a track premises licences. The Explanatory Notes for section 152 state “The general position for premises licensing is that premises may only be subject to one premises licence at a time... The effect of this requirement is to limit the principal activity on the premises to the provision of facilities for a particular type of gambling activity.”*
- 7.5 *The Act, via regulations also imposes mandatory and default conditions that promote the licensing objectives. A list of these Mandatory and Default conditions are attached at **Appendix C** to this report.*
- 7.6 *A premises licence issued by the Authority will be subject to the mandatory and default conditions for that licence type. However, paragraph 9.26 of the guidance states;*

“Section 169 of the Act gives licensing authorities:

- The ability to exclude from premises licences any default conditions that have been imposed under Section 168; and*
- The power to impose conditions on the premises licences that they issue.”*

8. Gambling Commission Guidance

- 8.1 *The Gambling Commission have produced guidance for local authorities in relation to the 2005 Act. The information in this section of the report relates to the relevant points within the Guidance which members may wish to consider.*
- 8.2 *Paragraphs 7.13 of the GLA describes what may be considered as a premises, it states that:*

“...there is no reason in principle why a single building could not be subject to more than one premises licence, provided they are for different parts of the building, and the different parts of the building can reasonably be regarded as being different premises. The approach has been taken to allow large, multiple unit premises such as pleasure parks, tracks, or shopping malls to obtain discrete premises licences, where appropriate safeguards are in place. However, licensing authorities should pay particular attention if there are issues about sub-division of a single building or plot and should ensure that mandatory conditions relating to access between premises are observed”

- 8.3 *Paragraph 7.18 of the GLA states:*

“...they [Licensing Authorities] should be aware of the following:

- Entrances to and exits from parts of a building covered by one or more premises licences should be separated and identifiable so that the separation of different premises is not compromised and people do not ‘drift’ into a gambling areas. In this context it should normally be possible*

to access the premises without going through another licensed premises...”

- 8.4 *Paragraph 7.19 of the GLA sets out factors that the Licensing Authority can use to assist in determining whether premises are truly separate. These factors may include:*
- Is a separate registration for business rates in place for the premises?*
 - Is the premises neighbouring premises owned by the same person or someone else?*
 - Can each of the premises be access from the street ort a public passageway?*
 - Can the premises only be accessed from any other gambling premises?*
- 8.5 *The Gambling Commissions Guidance to Licensing Authorities, 4th Edition (GLA) states in paragraph 7.23 that “The Gambling Act 2005 (Mandatory and Default Conditions) Regulations set out the access provisions for each type of premises. The Broad principle is that there can be no access from one licensed gambling premises to another...”*
- 8.6 *Paragraph 7.24 of the GLA states: “It should be noted that the Gambling Act 2005 (Mandatory and Default Conditions) Regulations define street as ‘including any bridge, road, lane, footway, subway, court, alley, or passageway (including passage through enclosed premises such as shopping malls), whether a thoroughfare or no’. This is to allow access, for example, to casinos from hotel foyers.”*
- 8.7 *Paragraph 7.25 of the GLA states “There is no definition of ‘direct access’ in the Act or regulations. However, it could be said that there should be an area separating the premises concerned (for example a street or café), which the public goes for purposes other than gambling, for there to be shown to be no direct access.”*
- 8.8 *Paragraph 1(3), Part 1 of Schedule 1 of the Mandatory and Default Conditions Regulations which sets out the mandatory conditions for converted casino premises licences state that “No customer shall be able to enter the premises directly from any other premises in respect of which a licence issued under Part 8 [Premises Licences] of the Act..., has effect”.*
- 8.9 *In the majority of the representations one of the points relates to the number of gambling premises in the vicinity of the premises. Paragraph 7.53 of the guidance states:*
- “... the following examples of possible representations would not likely be relevant: That there are already too many gambling premises in the locality (although it may be relevant if it points, as a result, to rising problems in crime, disorder, underage gambling or problem gambling)...”*
- 8.10 *The Committee can, if it feels minded impose conditions on the premises licence. Paragraph 9.28 of the Guidance states that*

“Licensing authorities should bear in mind their duty to act in accordance with the principles set out in Section 153. Since they should aim to permit the use of premises for gambling, they should not attach conditions that limit the use of premises for gambling except where it is necessary as a result of the requirement to act in accordance with the guidance, the Commissions codes of practice or the licensing policy statement; or in a way that is reasonably consistent with the licensing objectives.”

- 8.11 *The guidance goes further to state that authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions. If the authority does decide that the only way to address a particular concern is through conditions it must be proportionate to the circumstances which they are seeking to address.*
- 8.3 *The guidance encourages licensing authorities to ensure that premises licence conditions are relevant to the need to make the proposed building suitable as a gambling facility, directly related to the premises and the type of licence applied for, or fairly and reasonably related to the scale and type of the premises and reasonable in all other respects (see paragraph 9.29 of the guidance).*
- 8.4 *Local authorities are also prevented from attaching conditions relating to certain matters. Paragraph 9.32 of the guidance sets out the relevant sections of the Act where conditions may not be imposed.*

“...The relevant sections are:

- Section 169(4), which prohibits the authority from imposing a condition on the premises licence which makes it impossible to comply with an operating licence condition;*
- Section 172(10), which provides that conditions may not relate to gaming machines categories, numbers, or method of operation;*
- Section 170, which provides that membership of a club or body cannot be required by attaching a condition to the premises licence (the Act specifically removes membership requirements for casino and bingo and this prevents it from being reinstated); and*
- Section 171, which prevents an authority imposing conditions in relation to stake, fee, winning or prizes.”*

9. The Council’s Statement of Principles

- 9.1 *The Licensing Authority’s Statement of Principles set out the council’s policy considerations in relation to applications made under the Gambling Act. The Statement reemphasises the Authority’s position in relation to Section 153 of the Act and sets out the principles and policies that the Authority will adopt when considering and determining Gambling Act applications.*
- 9.2 *The Council’s Statement or Principles location policy (LOC 1) sets out that the authority will pay particular attention to the suitability of a location for gambling activity in terms of the objective of the protection of children and vulnerable persons from being harmed or exploited by gambling. It is the authority’s view that the applicant should establish if there are any sensitive premises or locations*

*within close proximity to the proposed gambling premises. Applicants should, in addition to their application submit information as to how they plan to promote this objective. A plan showing the location of schools, places of religious worship and hostels within a 500 metre radius of the premises is attached to this report as **Appendix D**.*

- 9.3 *The Council's Policy relating to Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime (OBJ1) sets out the criteria as to whether the premises make or will make a contribution to the levels of crime and disorder and whether the applicant has demonstrated that he has, or intends to, implement sufficient controls to prevent the premises being a source of, and/or associated with crime or disorder, or being used to support crime, if the application is granted".*
- 9.4 *The Council's policy relating to the Protection of children and other vulnerable people from being harmed or exploited (OBJ 3) sets out the criteria that the authority will consider when determining an application. The authority will have to be satisfied that the applicant has appropriate measures in place to protect children and other vulnerable persons from being harmed or exploited by gambling.*

10. Options for Members

- 10.1 *When determining the application the Committee will need to consider the Gambling Act 2005, the relevant Guidance to Licensing Authorities, the policies contained within the Council's Statement of Principles and the licensing objectives.*
- 10.2 *The Licensing Authorities representation to this application raises issue to breaches to the mandatory conditions for Converted Casino Premises Licences should the application be granted. Further, the application is not reasonably consistent with the Licensing Objectives and the application is not in accordance with the Gambling Commissions Codes of Practice and Guidance to licensing Authorities; and that it also isn't in accordance with the Council's Statement of Licensing Principles for Gambling.*
- 10.3 *Section 152 of the Act provides that a premises licence may not be issued in respect of premises if a premises licence already has effect in relation to the premises, except for a track premises licences. However, this section does not prohibit the Licensing Authority from determining the application.*
- 10.4 *Members need to be satisfied that if the application were to be granted there would be no breach of mandatory conditions and the granting of the application would not have a detrimental impact on the licensing objectives.*

11. Appendices

- 11.1 Appendix A1 – Application form
Appendix A2 – Current Gambling Premises Licence
Appendix A3 – Plans
Appendix B1a – LA Objection

Appendix B1b – Licensing Authority Further Submissions

Appendix C – Mandatory and default conditions for converted casino premises

Appendix D – Map of licensed gambling premises, schools and faith groups within a 500 metre radius of the premises

Appendix E – List of licensed gambling premises within a 500 metre radius of the premises

If you have any queries about this report or wish to inspect one of the background papers please contact Steve Rowe on 020 7641 7825 or email srowe@westminster.gov.uk.

Background Papers

- Gambling Act 2005
- Westminster City Council Gambling Statement of Principles Effective 4th January 2010
- Gambling Act 2005 (Premises Licence and Provisional Statements) Regulations 2007
- Guidance to Licensing Authorities 3rd Edition (May 2009)
- Gambling Commission Licence conditions and codes of practice (consolidated version March 2011)

04 JUN 2015

CITY OF WESTMINSTER

Application to vary a premises licence under the Gambling Act 2005

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

If you are completing this form by hand, please write legibly in block capitals using ink. Use additional sheets if necessary (marked with the number of the relevant question). You may wish to keep a copy of the completed form for your records.

Part 1 – Applicant Details

If you are an individual, please fill in Section A. If the application is being made on behalf of an organisation (such as a company or partnership), please fill in Section B.

Section A

Individual applicant

1. Title: Mr Mrs Miss Ms Dr Other (please specify)

2. Surname: _____ Other name(s): _____

[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence]

3. Applicant's address (home or business – *[delete as appropriate]*):

Postcode:

4(a) The number of the applicant's operating licence (as set out in the operating licence):

4(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made:

5. Tick the box if the application is being made by more than one person.

[Where there are further applicants, the information required in questions 1 to 4 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]

Section B

Application on behalf of an organisation

6. Name of applicant business or organisation:

HIPPODROME CASINO LTD

[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence.]

7. The applicant's registered or principal address:

10/14 CRANBOURN STREET
LONDON

Postcode: WC2H 7JH

8(a) The number of the applicant's operating licence (as given in the operating licence):

000-029471-N-311289-005

8(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made:

9. Tick the box if the application is being made by more than one organisation.

[Where there are further applicants, the information required in questions 6 to 8 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]

Part 2 – Premises Details

10. Trading name used at licensed premises:

HIPPODROME CASINO

11. Give the address of the premises or, if none, give a description of the premises and its location. Where the premises are a vessel, give the place indicated in the premises licence as the place in the licensing authority's area where the vessel is wholly or partly situated. Where possible this should include an address with a postcode:

10/14 CRANBOURN STREET
LONDON

Postcode: WC2H 7JH

12. Telephone number at premises (if known):

13. Type of premises licence to be varied:

Regional Casino

Large Casino

Small Casino

Converted Casino

Bingo

Adult Gaming Centre

Betting (track)

Betting (other)

Family Entertainment Centre

14. Premises licence number (if known):

14/08149/LIGV

15. If you are making this application alongside an application for transfer or reinstatement of the premises licence into your name, please give the name of the current licence holder as it appears on the premises licence (if known):

Surname:

Other name(s):

Part 4 – Declarations and Checklist (Please tick as appropriate)

I/ We confirm that, to the best of my/ our knowledge, the information contained in this application is true. I/ We understand that it is an offence under section 342 of the Gambling Act 2005 to give information which is false or misleading in, or in relation to, this application.

I/ We confirm that the applicant(s) have the right to occupy the premises.

Checklist:

- Payment of the appropriate fee has been made/is enclosed
- A plan of the premises is enclosed
- The existing premises licence is enclosed
- The existing premises licence is not enclosed, but the application is accompanied by –
 - A statement explaining why it is not reasonably practicable to produce the licence and,
 - An application under the Section 190 of the Gambling Act 2005 for the issue of a copy of the licence
- I/we understand that if the above requirements are not complied with the application may be rejected
- I/ we understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities

Part 5 – Signatures

19. Signature of applicant or applicant's solicitor or other duly authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Print Name:

BERWIN LEIGHTON PAISNER LLP

Date:

(dd/mm/yyyy)

Capacity:

SOLICITOR FOR APPLICANT

04/06/2015

20. For joint applications, signature of 2nd applicant, or 2nd applicant's solicitor or other authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Print Name:

Date:

(dd/mm/yyyy)

Capacity:

[Where there are more than two applicants, please use an additional sheet clearly marked "Signature(s) of further applicant(s)". The sheet should include all the information requested in paragraphs 19 and 20.]

[Where the application is to be submitted in an electronic form, the signature should be generated electronically and should be a copy of the person's written signature.]

Part 3 – Details of variations applied for

16(a) Please give details of any variation which is being applied for. Where the application includes an application to exclude or vary a condition of the premises licence, identify the relevant condition here (unless it relates to hours of operation which are dealt with in questions 16(b) and 16(c)):

REMOVE THE FRONT ENTRANCE LOBBY AND ADJACENT AREA FROM THE AMBIT OF THE GAMBLING LICENCE

16(b) Do you want the licensing authority to exclude or vary a condition of the licence so that the premises may be used for longer periods than would otherwise be the case?

Yes/No [delete as appropriate]

16(c) If the answer to question 16(b) is yes, please complete the table below to indicate the times when you want the premises to be available for use under the premises licence.

	Start	Finish	Details of any seasonal variation
Mon	hh:mm	hh:mm	
Tue			
Wed			
Thurs			
Fri			
Sat			
Sun			

17. Please indicate any particular date on which you want the variation to take effect if approved: (dd/mm/yyyy) 5/7/2015

18. Please set out any other matters which you consider to be relevant to your application:

/

Part 6 – Contact Details

21(a) Please give the name of a person who can be contacted about the application:

CRAIG BAYLIS

21(b) Please give one or more telephone numbers at which the person identified in question 21(a) can be contacted:

0203 400 2326

22. Postal address for correspondence associated with this application:

BLP
ADELAIDE HOUSE
LONDON BRIDGE
LONDON

Postcode:

EC4R 9HA

23. If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:

craig.baylis@blplaw.com



City of Westminster

64 Victoria Street, London, SW1E 6QP

No: 14/08149/LIGV

Original Ref: 07/08119/LIGCF

CONVERTED CASINO PREMISES LICENCE

This licence is issued under section 164 of the Gambling Act 2005 by

City of Westminster

Part 1 – Details of person to whom licence is issued

The premises licence is issued to:

Hippodrome Casino Limited

of the following address:

Hippodrome Casino
Cranbourn Street
Leicester Square
London
WC2H 7JH

who holds an operating licence which has been given the following operating licence number by the Gambling Commission:

000-029471-N-311289-005

Part 2 – Details of the premises in respect of which the licence is issued

Facilities for gambling may be provided in accordance with this licence on the following premises:

The Hippodrome Casino
10 – 14 Cranbourn Street
London
WC2H 7JH

Part 3 – Premises licence details

This licence came into effect on:

10.10.2008

This licence is of unlimited duration.

This licence has been re-issued following the grant of an application to vary the licence.

The variations to the licence take effect on:

19.05.2015

The following conditions have been attached to the licence by the issuing authority under section 169(1) of the Gambling Act 2005:

1. At any time that persons under the age of 18 are permitted to enter the premises, the licence holder shall ensure that the sound screen separating the Matcham room from the main gambling area is fully closed and permits no access to or observation of the gambling facilities in the main gambling area.
2. At any time that persons under the age of 18 are permitted to enter the premises, the licence holder shall ensure that measures are taken to prevent such persons entering parts of the premises licensed for gambling by securing any door which may provide such access and limiting access by appropriate programming of the lifts.
3. The premises shall install and maintain a comprehensive CCTV system as per the minimum requirements of the Westminster Police Licensing Team. All entry and exit points will be covered enabling frontal identification of every person entering in any light condition. The CCTV system shall continually record whilst the premises is open for licensable activities and during all times when customers remain on the premises. All recordings shall be stored for a minimum period of 31 days with date and time stamping. Viewing of recordings shall be made available immediately upon the request of Police or authorised officer throughout the preceding 31 day period.
4. At least 1 SIA licensed door supervisors shall be on duty at every entrance to the premises at all times whilst it is operating under this licence.

5. A barrier will be installed and maintained in the Cranbourn Street lobby to restrict access to the Cranbourn Street stairwell and lift when that entrance is not in use.
6. The licensee shall not allow their logos or other promotional material to appear on any commercial merchandising which is designed for use by children.

The following conditions, which would otherwise have been attached to the licence by virtue of regulations made under section 168 of the Gambling Act 2005, have been excluded by the issuing authority under section 169(1)(b) of that Act:

No facilities for gambling shall be provided on the premises between the hours of 06:00 and noon on any day.

A scale plan is attached as an annex to this licence.

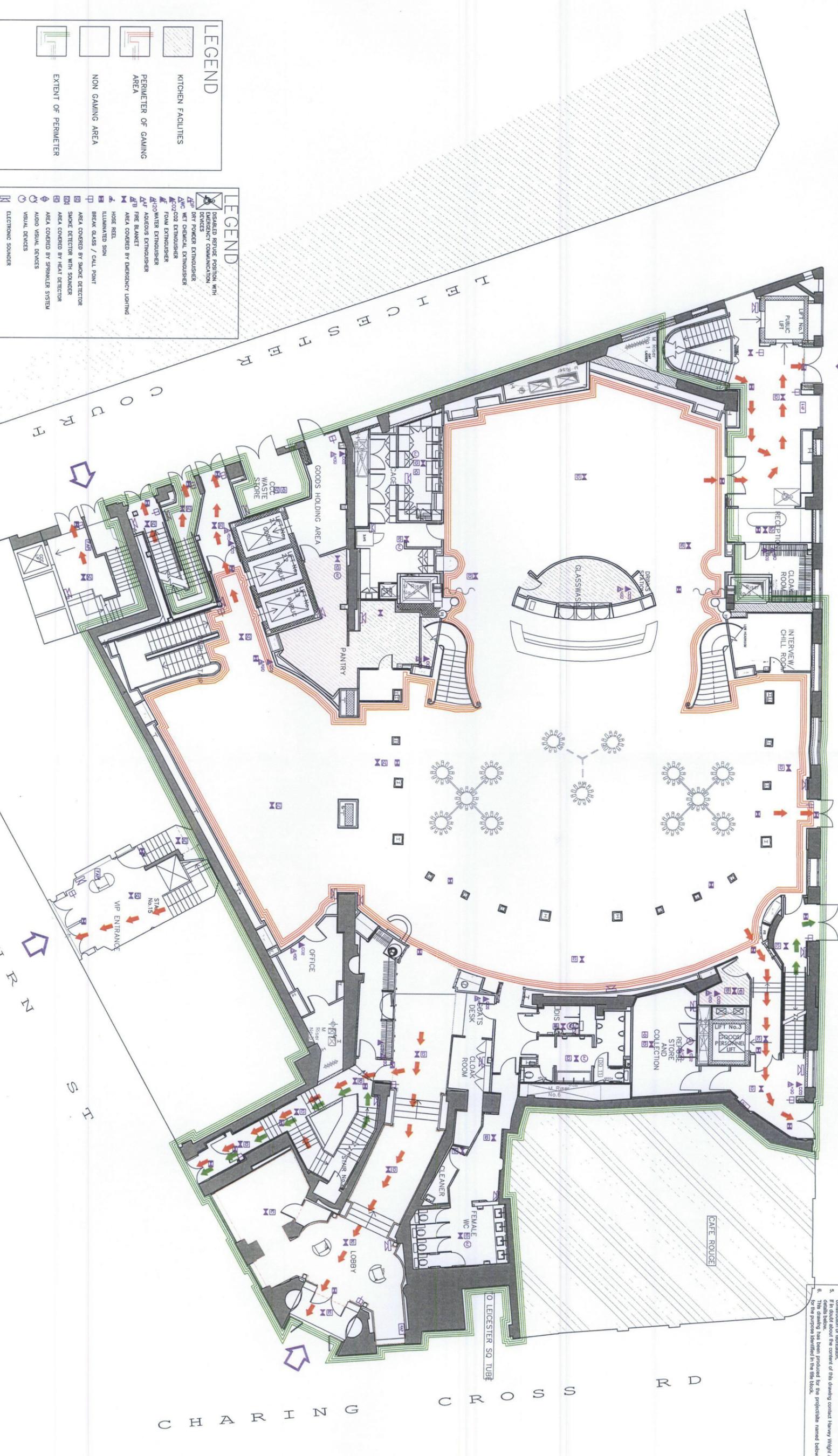
Date: 1 September 2015



Signed: pp

Director – Public Protection and Licensing

LITTLERNEWPORTST



LEGEND

- KITCHEN FACILITIES
- PERIMETER OF GAMING AREA
- NON GAMING AREA
- EXTENT OF PERIMETER
- ENTRANCE
- STAFF EXITS
- PUBLIC EXITS

LEGEND

- DISABLED REFUGE POSITION WITH EMERGENCY COMMUNICATION DEVICES
- DRY POWDER EXTINGUISHER
- ABC WET CHEMICAL EXTINGUISHER
- CO2 EXTINGUISHER
- FOAM EXTINGUISHER
- WATER EXTINGUISHER
- AQUEOUS EXTINGUISHER
- FIRE BLANKET
- AREA COVERED BY EMERGENCY LIGHTING
- HOSE REEL
- ILLUMINATED SIGN
- BREAK GLASS / CALL POINT
- AREA COVERED BY SMOKE DETECTOR
- SMOKE DETECTOR WITH SOUNDER
- AREA COVERED BY HEAT DETECTOR
- AREA COVERED BY SPRINKLER SYSTEM
- AUDIO VISUAL DEVICES
- VISUAL DEVICES
- ELECTRONIC SOUNDER
- FIRE ALARM PANEL
- FIRE ALARM INTERFACE
- PANIC BOLT
- FIRE TELEPHONE

THE POSITION OF THE FIRE & OTHER SAFETY OTHER POSITIONS AS AGREED FROM A TIME IN CONSULTATION WITH THE FIRE AUTHORITY

NOTES

1. Drawing is copyright and no element or supporting information can be reproduced or altered without written consent of the architect.
2. Do not scale from this drawing. Contractor and sub-contractors are undertake their own site survey and to verify all dimensions on-site prior to fabrication.
3. Unless informed otherwise, this drawing must be used in conjunction with the current Building Regulations, Approved Documents, and any referenced drawings.
4. All work shall be carried out in accordance with the current Building Regulations. Seek approval from Building Control prior to commencing construction or fabrication.
5. Details below, and the content of this drawing contact Harvey Wright Architects, for the purpose identified in the title block.
6. This drawing has been produced for the project/contract named below and only for the purposes identified in the title block.



NO.	DATE	DESCRIPTION OF REVISION
001	10/10/09	Production marked daily/Christian Doherty
002	11/05/14	Perimeter revised

harvey wright architects

LONDON HIPPODROME CASINO, LEICESTER SQ.
 PROPOSED GROUND FLOOR LICENSING PLAN

DATE: 09 JULY 14
 DRAWN BY: JH
 CHECKED BY: JH
 SCALE: 1:100 @ A1
 PROJECT NO: 4009-108

CONSTRUCTION AS BUILT

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LITTLE NEWPORT STREET

SECOND FLOOR

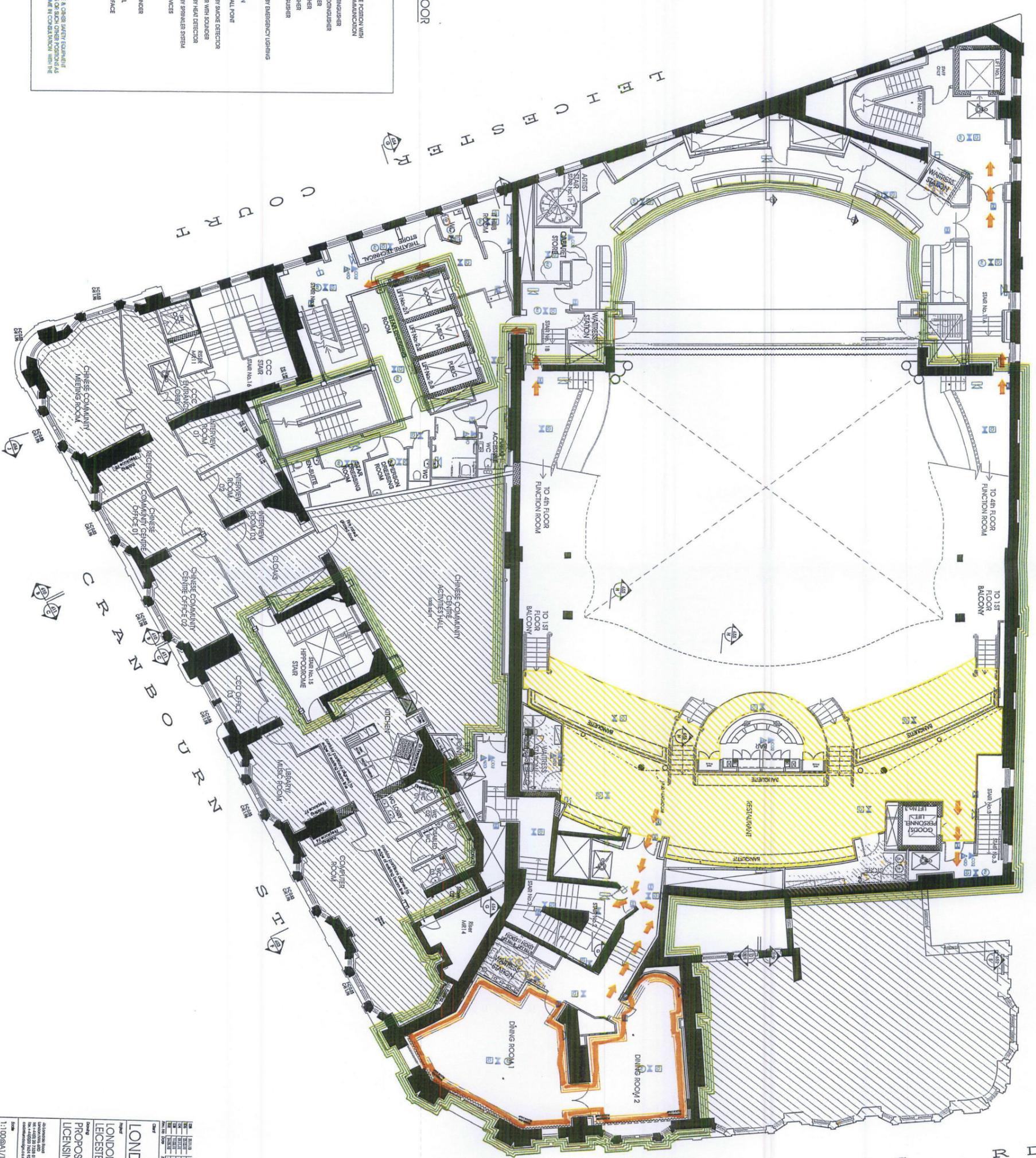
CHARING CROSS ROAD

LEGEND

- Public Exit
- Staff Exit
- Entrance
- Extent of Firewater
- Non-gaming Area
- Firewater of Gaming Area
- Machine Facilities
- Firewater of Gaming Area

LEGEND

- Disabled refuge position with emergency communication devices
- Dry powder extinguisher
- Water chemical extinguisher
- CO2 extinguisher
- Foam extinguisher
- Water extinguisher
- Agonistic extinguisher
- Fire blanket
- Area covered by emergency lighting
- Alarm bell
- Break glass / call point
- Area covered by smoke detector
- Smoke detector with sounder
- Area covered by heat detector
- Area covered by sprinkler system
- Audio visual devices
- Visual devices
- Electronic scanner
- Fire alarm panel
- Fire alarm interface
- Fire panic point
- Fire telephone



LONDON HIPPODROME LTD	
LONDON HIPPODROME CASINO LEICESTER SQUARE	
PROPOSED SECOND FLOOR LICENSING PLAN	
CADMIUM DESIGN	
11:00@A/11.200@A3 24.04.08	MS PR

Notes:
 1. This document is intended to be used for the purpose of the licence application and any other documents are to be referred to the relevant documents in the licence application.
 2. The plan shows the proposed fire water and fire alarm system for the proposed casino.
 3. The plan shows the proposed fire water and fire alarm system for the proposed casino.
 4. The plan shows the proposed fire water and fire alarm system for the proposed casino.
 5. The plan shows the proposed fire water and fire alarm system for the proposed casino.

From: Simpkin, Kerry
Sent: 02 July 2015 12:39
To: Gambling
Cc: Rowe, Steven; craig.baylis@blplaw.com
Subject: 15/04522/LIGV - Hippodrome Casino variation application

Hi Steve

Please take this email as a representation to the Hippodrome Casino's application to vary its licence. The reasons for my representation is that the application will not meet the requirements of the Mandatory Conditions for Converted Casino Premises Licences and that the application is not reasonably consistent with the Licensing Objectives and is not in accordance with the Gambling Commissions Codes of Practice and Guidance to licensing Authorities; and that it also isn't in accordance with the Council's Statement of Licensing Principles for Gambling.

I will be writing to Craig Baylis relating to this application and the specific issues relating to his client's application in due course with a view to having further discussions about it.

Kind regards

Mr Kerry Simpkin
Licensing Team Manager

Licensing Team
Public Protection & Licensing
Westminster City Council
4th Floor East
64 Victoria Street
London SW1E 6QP

Tel: 020 7641 1840
E-mail: ksimpkin@westminster.gov.uk
Web: www.westminster.gov.uk

Mr C Baylis
Berwin Leighton Paisner LLP
Adelaide House
London Bridge
London EC4R 9HA

Mr Kerry Simpkin
Licensing Team Manager

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Date: 2nd September 2015

Your Ref: CAB/24368.00002
Our Ref: 15/03306/LIGN and 15/04522/LIGV

Dear Mr Baylis

Application for a new Betting (Other) Premises Licence for the Hippodrome Casino, London

Thank you for your letter dated the 15th June 2015 and for meeting with me on Tuesday 1st September 2015. The representation from the Licensing Authority clearly sets out the Authority's views in relation to the application for a new Betting (Other) Premises Licence. However, since that time I have considered your submission relating to that representation and the discussions we had at our meeting.

At the meeting on the 1st September you expressed your client's view that he felt it was unfair that a new Small or Large Casino Premises Licence, which cannot be applied for within Westminster, can provide betting under their licences. You stated that it was your client's view that this was unfair and that it was his intention to lobby government on that issue. Although I can understand your client's frustrations regarding this issue, the Licensing Authority must ensure that all applications are considered against the requirements of the Gambling Act 2005 and associated regulations; that the licence, if granted would operate in accordance with the Gambling Commission's Codes of Practice and Guidance to Licensing Authorities, reasonably consistent with the licensing objectives and in accordance with the Authority's Statement of Principles for Gambling (SOP).

At this meeting you also raised that other local authorities have granted betting shop licences in other casino premises without any issues and you made reference to the Grosvenor Casino in Southend. We are approaching the application for a new betting shop and application to vary the Casino Licence applications in the same way we approach any other application. We assess the application to establish if there are any concerns relating to application in whether it is compliant with the Act and the Licensing Objectives either via the application process or when granted. Whilst other Licensing Authorities may have granted similar applications in their jurisdiction, Westminster City Council as the Licensing Authority for this application will consider all of the information and make its own interpretation of the Act and regulations when determining this application. We are not in a position to comment on the reasoning of another licensing authority and any such decision is not binding on Westminster's Licensing Authority.

The Licensing Authority is of the opinion that the new Betting (Other) Premises Licence application as currently proposed would breach the mandatory condition in paragraph 2(1) of Part 1, Schedule 5 of the Gambling Act 2005 (Mandatory and Default Conditions) (England and Wales) Regulations 2007 (2007 Regs) relating to direct access. This mandatory condition states:

“Access to the premises shall be from a street or from other premises with a betting premises licence.”

You have stated that “we believe that this application will be fully compliant with the various legal requirements...” and you explain why you believe this to be the case. The Licensing Authority disagrees with this interpretation of the requirements surrounding direct access and the requirements relating to this mandatory condition.

Firstly you state paragraph 7.13 – 7.15 of the Gambling Commissions Guidance to Licensing Authorities 4th Edition (GLA) which refers to a single building could be subject to more than one premises licence. For clarity the full wording of these paragraphs are provided bellow:

“Meaning of premises

7.13 *In the Act, ‘premises’ is defined as including ‘any place’. Section 152 therefore prevents more than one premises licence applying to any place. But, there is no reason in principle why a single building could not be subject to more than one premises licence, provided they are for different parts of the building, and the different parts of the building can reasonably be regarded as being different premises. This approach has been taken to allow large, multiple unit premises such as pleasure parks, tracks, or shopping malls to obtain discrete premises licences, where appropriate safeguards are in place. However, licensing authorities should pay particular attention if there are issues about sub-division of a single building or plot and should ensure that mandatory conditions relating to access between premises are observed.*

7.14 *In most cases the expectation is that a single building/plot will be the subject of an application for a licence, for example, 32 High Street. But that does not mean that 32 High Street cannot be the subject of separate premises licences for the basement and ground floor, if they are configured acceptably. Whether different parts of a building can properly be regarded as being separate premises will depend on the circumstances. The location of the premises will clearly be an important consideration and the suitability of the division is likely to be a matter for discussion between the operator and the licensing officer. However, the Commission does not consider that areas of a building that are artificially or temporarily separated, for example by ropes or moveable partitions, can properly be regarded as different premises.*

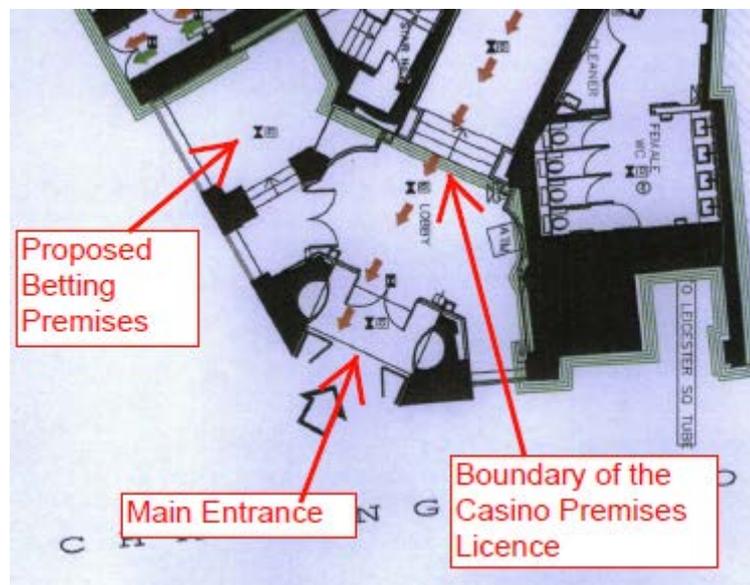
7.15 *We recognise that different configurations may be appropriate under different circumstances but the crux of the matter is whether the proposed premises are genuinely separate premises that merit their own licence with, for example, the machine entitlements that brings and are not an artificially created part of what is readily identifiable as a single premises.”*

Paragraph 7.13 clearly sets out that with regard to single buildings having more than one licensed premises within it was directed at multiple-use buildings. The Commission specifies some examples of these within this paragraph such as pleasure parks, tracks or shopping malls. These examples are clearly multiple unit venues which offer different types of activity other than gambling and are provided by different operators or businesses.

The Licensing Authority is aware that the Hippodrome does have other licences for the premises to enable Sexual Entertainment, Civil Marriages and the sale of alcohol, provision of regulated entertainment and the provision of late night refreshments. However, it is the Licensing Authority’s view that the Hippodrome is not a multi-unit premises as the other activities provided by the Hippodrome all relate to promoting or augmenting the main offering for the premises as a licensed casino and that all of the operations are run by the Casino and not separate operators or businesses.

Paragraph 7.14 then refers to single buildings, which is what the Hippodrome is classified as by the Licensing Authority. The Commission does state that a building can have more than one gambling premises licence within in it as long as those licensed premises are “properly regarded as separate”.

Since my representation to the betting shop application you have subsequently applied to vary the existing Converted Casino Premises Licence for the Hippodrome so as to move the boundary of the licence. By moving the boundary of the licensed premises from the main boundary of the building the betting shop and the main entrance lobby area will no longer be within that licensed area. The edited snapshot from the plan provided as part of that variation application is shown below:



The 2007 Regs adds a Mandatory Condition on the Hippodrome Casino Licence that “The principle entrance to the premises shall be from a street” (Regulation 4, Part 1 of Schedule 1, paragraph 1(1)). The definition of a street in the 2007 Regs are broad and does make reference to a passage way which includes a passageway though an enclosed premises such as a shopping mall. It is your view that the lobby area would fall within the definition of a street and that would then mean that there would be no direct access between the casino and proposed betting shop as access would be from the ‘street’.

The Licensing Authority is of the view that the lobby is not a street and the principle entrance cannot be from the lobby and must be to Cranbourn Street. A passageway is given as including a passageway through a building such as a mall. It is highly likely that the intention of Government in relation to this was to allow premises that are located in a mall or other multiple use premises (premises that offer other services than gambling).

Policy DAP1 of the Licensing Authority’s Statement of Principles (SOP) specifically addresses applications and licensed premises that have more than one gambling premises licence and the division and access between those premises. This policy states:

“Policy: DAP1

Applications to have more than one licensed premises within a building, or divide and separate a building into different premises will be determined subject to other policies in this Statement of Principles and subject to the relevant criteria in Policies OBJ1, OBJ2 and OBJ3, and other policies in this statement, and it will need to be demonstrated that:

- (1) the different premises are genuinely separate premises, and not an artificially created part of what is readily identifiable as a single premises*
- (2) separation between the premises is appropriate*
- (3) access between premises is restricted to prevent unlawful direct access by customers between licensed premises”*

The reason for this policy is clearly stated within the SOP at paragraphs 22.1 to 22.3. The Licensing Authority states at paragraph 22.3 of its SOP:

“22.3 Some applicants have attempted to create an unlicensed area accessed from the street which then leads into separate licensed premises, see figure 1. In such cases the premises are not clearly identifiable as separate premises and the unlicensed area is not likely to be used by the public other than by those using the gambling premises. Applications to place two licensed premises in one premises with a unlicensed area separating them, (see figure 2) will also not meet this policy because of the artificial nature of the premises, access, and likely use issues which arise.”

This paragraph refers to figures which have not been included in this letter but can be viewed within the SOP on page 21. Figure 1 clearly represents a similar example to the one being suggested in relation to the lobby area to both the casino and the proposed betting shop.

Paragraph 22.4 of the Licensing Authority SOP then goes on to state:

“22.4 It is possible to have a foyer area or passage way which separates one licensed premises from another. However, such a foyer or passage way must be accessible and generally used by members of the public other than those using the gambling premises. An example of this would be a hotel lobby which has an entrance to a casino and adult gaming centre off it. The foyer itself will be used by hotel guests and visitors who may have no intention of using either licensed premises.”

It is the Licensing Authority's view that the current application does not meet policy DAP1 for the following reasons:

1. The betting shop and the casino are not separate premises and are artificially created within one building (the Hippodrome Casino)
2. The separation between the two premises is not appropriate as you can readily access one from the other and that the only distinction between the two premises are the lines drawn on the plans. The betting shop will be within the Hippodrome Casino which when viewing the premises main entrance from Cranbourn Street will not be separately branded or distinguishable from the Casino itself.
3. Access between the premises is not restricted and as such would be a breach of the mandatory condition relating to direct access.

It is the Licensing Authority's view that the new and variation applications as currently applied for are an attempt to circumvent the requirements of the Mandatory Conditions in relation to direct access. The Explanatory notes for the 2007 Regs set out the Government's reasons for implementing the Mandatory Condition relating to direct access. It states:

“7.6 The Act provides that, except in the case of tracks, a single premises may not have more than one premises licence authorising a type of gambling activity. There were concerns that some unscrupulous operators might seek to circumvent this by artificially subdividing their premises and securing separate premises licences for its composite parts, which would undermine the different categories of premises licence created by the Act.”

Whilst the Licensing Authority is in no way suggesting that your client is an unscrupulous operator, we feel that there is an intention to gain the licence to allow your client to operate on the same terms in relation to offering betting as the Small and Large Casino Premises Licence categories. As such these applications are clearly going to undermine the categories of premises licences created by the Act. It was clearly the government's intention to enable betting in licensed Small and Large Casinos and to restrict it from Converted Casino licences.

Having regard to the lack of information in the new betting shop application, you have provided a document called "Hippodrome Casino Limited Policy Information" which sets out the policies that your client will apply relating to the operation of the licence. This document is very generic and addresses, at a high level, the approach you will take to meet the requirements of the Act; and the operating and premises licences. However, you have not provided any specific information to show how you will ensure that the betting shop premises will be reasonable consistent with the licensing objectives.

As you will no doubt be aware Cranbourn Street and Leicester Square is an extremely busy area which draws in a large number of visitors at all times of the day. There are a large number of alcohol and entertainment premises and due to the high crime rate in the area the Metropolitan Police Service has defined this area a high risk location. To combat the risk the police have established the Impact Team to provide a 24 hour presence of Police Officers in the area.

You have advised that access to the betting shop will be restricted by the Hippodrome's SIA licensed security. The CCTV system within the betting shop will be part of the casino's CCTV system and monitored by the Hippodromes security staff. As a result the requirements for CCTV that the Licensing Authority and the Police would normally wish to be installed are already present. There will also be a panic alarm fitted at the counter to alert security.

It is not clear whether there is an intention to provide a screen for the member of staff behind the betting shop counter but as the security arrangements are in place it would suggest that this may not be necessary, however your client should have undertaken a risk assessment relating to this to determine the level of risk and potential hazard of not putting in a counter screen.

There may be times when customers are identified by staff or other agencies such as the police that should be prevented from accessing the premises. I note that you have not provided any policies associated with a banning system that you will operate on the premises. It is the Licensing Authority's view that there will be times when banning customers will be necessary to protect one or more of the licensing objectives.

There is also a need to record significant incidents and aspects of staff intervention. A form of recording these incidents should be implemented on the premises.

The Licensing Authority is proposing the following conditions to address this risk.

- *The licensee shall develop a banning system which will include policy and procedure for that system which would be triggered if a customer:*
 - (a) *is insulting or abusive to staff or other customers*
 - (b) *does not comply with the rules or by instruction from a member of staff*
 - (c) *causes anti-social behaviour on or outside the premises*
 - (d) *engage in crime or disorder within or outside the premises*

- (e) *uses drugs or tries to bring in or consumes alcohol on the premises*
 - (f) *is under the required age for entry and persistently attempts to gain entry, and*
 - (g) *for any other reason that the operator deems appropriate.*
- *The licensee shall:*
 - (a) *provide training on the premises banning system as part of the staff induction training programme, and*
 - (b) *periodically provide refresher training to all of its staff working at these premises if that system changes in anyway*

Participation in this training shall be formally recorded on each member of staff's training records which, if requested will be presented to the Licensing Authority as soon as practicable.
 - *If at any time (whether before or after the opening of the premises), the police or licensing authority supply to the premises names and/or photographs of individuals which it wishes to be banned from the premises, then they shall be banned with immediate effect*
 - *An incident log shall be kept for the premises and made available on request to an authorised officer of the City Council or the Police which will record the following;*
 - (a) *All crimes reported to the venue;*
 - (b) *Any complaints received regarding crime and disorder;*
 - (c) *Any incidents of disorder;*
 - (d) *Any faults in the CCTV system; and*
 - (e) *Any visit by a relevant authority or emergency service.*
 - *Gaming Machines shall not be emptied whilst customers are on the premises and when there is only one member of staff on the premises.*

Vulnerable groups in the area

The area surrounding Leicester Square is known to have a homeless population and there are a number of homeless hostels or homeless support services within a 400 metre radius of these premises. The City of Westminster has the largest population of homeless people in the Country and has approximately 50% of London's total homeless population. The Council has undertaken research that show that the homeless are at significantly higher risk to gambling than the general population.

The Licensing Authority considers the homeless to be a vulnerable group under the third licensing objective and expects operators to identify what risks their operation may have on that group. There is very little evidence from your submissions that you have assessed the local risk relating to the homeless.

With a view to restricting the potential appeal for the homeless, who may not be easily identifiable at the point of entry into the casino, the Licensing Authority have proposed the following conditions that the Licensing Authority may wish to attach to the licence if they determine to grant the application. The proposed conditions would mitigate this risk associated with the homeless.

- *Customer shall not be permitted to leave bags or other belongings on the premises.*
- *The licensee will contact the local homeless hostels/shelters and offer to provide information on problem gambling support services and how their residents can self-exclude from the Hippodrome betting premises.*
- *The Licensee shall take all reasonable steps to prevent customers from drinking alcohol directly outside the premises and to ban from the premises those who do so.*
- *The Licensee shall place a notice visible from the exterior of the premises stating that customers drinking alcohol outside the premises are not permitted and those who do so will be banned from the premises.*
- *There shall be no cash point or ATM facilities on the premises.*

Another vulnerable group identified by the Licensing Authority is the Chinese community within and around China Town. The local Chinese population have been identified as at risk to being susceptible to gambling related harm due to a number of factors which includes their cultural heritage and association with gambling.

The Licensing Authority is keen to ensure that operators put measures in place to reduce the risk to this local vulnerable community. You have not provided any information to show that you have assessed the risks associated to this community from your gambling operation. The Licensing Authority is proposing the following conditions are attached to your betting premises licence if granted.

- *The licensee shall ensure that no advertisement or promotion is provided or advertised on or near the premises which could entice participation in gambling by the local Chinese community.*
- *All public signage/documentation relating to age restrictions, gambling advice and gambling support information (e.g. GamCare or similar support service) is displayed or provided on the premises in written English and Chinese (Simplified and Traditional).*
- *The licensee shall not offer any enticement promotions, such as happy hours during which gaming machines stakes are reduced.*

It should also be noted that the Casino does provide alcohol to its customers. This means that some of the customers who have been in the Casino consuming alcohol could move between the two premises and that those under the influence of alcohol would be more vulnerable to gambling related harm. No information has been provided to address this issue within the policy document and through discussions. This concern should be addressed through staff training and robust procedures relating to those who have consumed too much alcohol. It is proposed that the following condition is attached to the licence if the Licensing Authority are minded to grant the licence.

- *The licensee shall:*
 - a) *Provide training on the risk associated to those under the influence of alcohol in respect of gambling related harm and the Hippodromes policy on intervention to protect those individuals as part of the staff induction training programme.*
 - b) *Periodically provide refresher training on a regular basis or when the Hippodromes policies are changed to all betting staff and security personnel who work at these premises on these risks and intervention policies to the licensing objectives.*

Participation in this training shall be formally recorded on each member of staffs training records which, if requested will be presented to the Licensing Authority as soon as practicable.

Gaming machine seating

The Licensing Authority are concerned that gaming machine stools can be used to cause criminal damage or be used as a weapon if they are not weighted appropriately or permanently affixed to the floor. The Licensing Authority is proposing the following condition if the licence is to be granted.

- *The licensee shall ensure that all gaming machine seating within the premises are weighted to prevent lifting or permanently affixed to the floor.*

Self Service Betting Terminals

Due to the size of the proposed betting premises and that the premises can have, by right, up to 4 category B2 gaming machines, there is a concern over the ability to provide Self Service Betting Terminals (SSBT). Section 181 of the Gambling Act 2005 enables the Licensing Authority to attach a condition relating to the number of SSBT's that can be used on the premises, the nature of those machines and the circumstances in which those machines are made available for use.

The Licensing Authority is proposing the following condition on the Betting (Other) Premises Licence if the Licensing Authority were to grant the licence:

- *The number of Self Service Betting Terminals shall be limited to*
 - (1) *One if no gaming machines are made available for use on the premises, or*
 - (2) *Zero if gaming machines are made available on the premises.*

Advertising the Casino

As casino games are a potentially higher form of gambling and that betting's shops should not promote other categories of gambling premises, the following condition is proposed for the new Betting (Other) Premises Licence if the Licensing Authority are minded to grant the application:

- *No promotional material or advertising in any form shall be provided within the premises relating to the Hippodromes casino operation.*

Application to vary the converted casino Premises Licence for the Hippodrome Casino, London

With regard to the application to vary the Converted Casino premises licence, if the Licensing Authority determines to grant the application as proposed then the following conditions are proposed to address the Authority's concerns:

- *No alcohol is permitted beyond the main entrance into the lobby area.*
- *One SIA licensed security staff shall be on duty between the hours of 07:30 to 22:00 Monday to Saturday and 07:30 to 00:00 on Sundays at the principal entrance of the Casino.*
- *No promotional material or advertising in any form shall be provided within the premises relating to the Hippodromes betting shop operation.*

In summing up it is the Licensing Authority's view that both applications if granted would breach the mandatory conditions relating to the primary entrance for Casinos and direct access. The applications appear to be an attempt to circumvent the restrictions on the Converted Casino Premises Licence prohibiting betting and the intention of Government in relation to the mandatory conditions. It is our view that both applications should be rejected on this basis. However, if the Licensing Authority are minded to permit these applications then in order to address the concerns associated with the licensing objectives the above conditions must be attached.

I will send further information and photographs for the Licensing Sub-Committee hearing which I will send to you shortly. I am unable to be present at the hearing due to other

commitments so Nick Nelson, Senior Licensing Officer will be attending and presenting the Licensing Authority's representation on my behalf.

If you need to discuss any element of this letter or any other matter relating to these applications please do not hesitate to contact Nick Nelson on 020 7641 3431 or email him at nnelson@westminster.gov.uk.

Yours sincerely



Mr Kerry Simpkin
Licensing Team Manager
Public Protection & Licensing



INC. UDE. MUSTANG SAI

SEE THE ILLUSION

LONDON'S MAGIC

NO.

99d66



9
180

ENTRANCE

MAIN ENTRANCE

ENTRANCE

MAIN ENTRANCE

BOX OFFICE

BOX OFFICE

WELCOME

COCKTAILS & CABARET & STEAK



19

SEE THE ILLUSION

LONDON'S MAGIC

NO.



THE BEST MUSICAL IN LONDON
BILLY ELIOT
THEATRE
LIVE
SOUL
FAMILY
THEATRE

THE BEST MUSICAL IN LONDON
BILLY ELIOT

COOLEST CASINO IN TOWN!
FULLY AIR CONDITIONED

UK'S No.1 CASINO
NO MEMBERSHIP • JUST WALK IN



THEATRE

CASINO

THE MUSICAL
Cambridge Theatre
ON

HIPPONDIA
CASINO
LONDON





**HIPPODROME CASINO
OPEN 24/7**

OPEN 24 HOURS

OPEN 24 HOURS

CASINO
COCKTAIL BAR
CLUB
TRADING TABLES
SPORTSBOOKS

TRADING TABLES
SPORTSBOOKS
CLUB
COCKTAIL BAR
CASINO

18
SMOKE FREE



OPEN 24 HOURS

HIPPODROME CASINO

Mandatory conditions attaching to casino premises licences

1. (1) The principal entrance to the premises shall be from a street.
 - (2) No entrance to the premises shall be from premises that are used wholly or mainly by children, by young persons, or by both.
 - (3) No customer shall be able to enter the premises directly from any other premises in respect of which a licence issued under Part 8 of the Act, or a permit issued under Schedule 10, 12 or 13 to the Act, has effect.
2. A gap of at least 2 metres shall be maintained between any ordinary gaming table and any other equipment, apparatus or structure used by a person to gamble on the premises.
3. No more than 40 separate player positions may be made available for use in relation to wholly automated gaming tables at any time.
- 4.—(1) The rules of each type of casino game that is available to be played on the premises shall be displayed in a prominent place within both the table gaming area and other gambling area of the premises to which customers wishing to use facilities for gambling have unrestricted access.
 - (2) The condition in sub-paragraph (1) may be satisfied by—
 - (a) displaying a clear and legible sign setting out the rules; or
 - (b) making available to customers leaflets or other written material containing the rules.
5. Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling at any gaming table, gaming machine or betting machine in order to do so.



City of Westminster

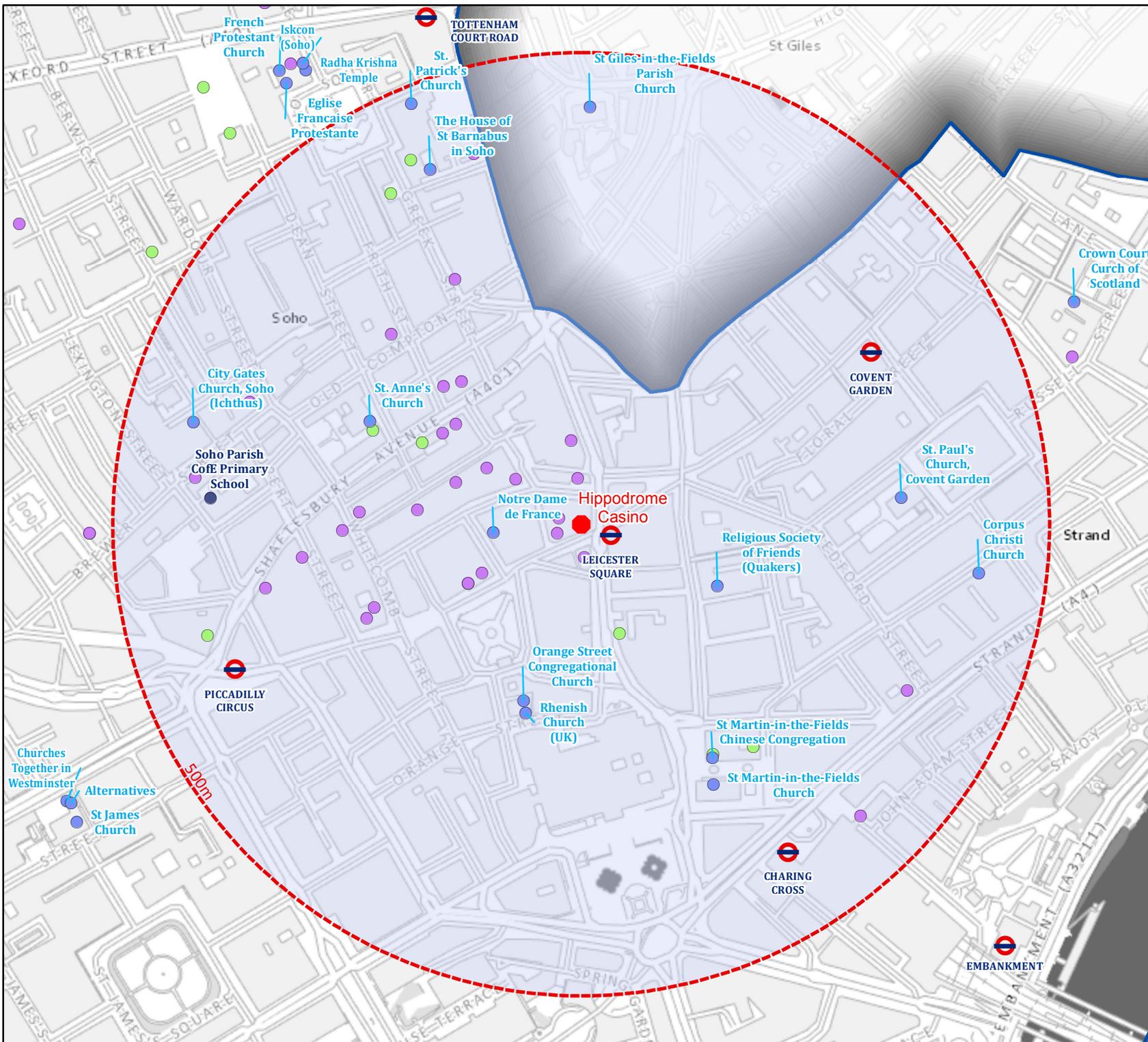
Corporate GIS Team

Hippodrome Casino

10-14 Cranbourn Street,
London,
WC2H 7JH

Legend

-  Hippodrome Casino
-  Licensed Gambling Estab.
-  Faith Groups
-  Schools
-  Hostels - Special Needs Schemes
-  Tube Stations
-  500m Casino Buffer
-  Westminster Boundary

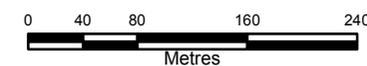


Map produced by:

Westminster Corporate GIS Team

Date: July 2015

Ref: 992



TradingName	Address	PremisesUse
William Hill	Lower Ground Floor Trocadero 46 Shaftesbury Av	Providing facilities for other betting
William Hill	1A Bedford Street London WC2E 9HD	Providing facilities for other betting
Play To Win	Basement 36 Old Compton Street London W1D 4	Operation of an adult gaming centre
Ladbrokes	7 Villiers Street London WC2N 6NQ	Providing facilities for other betting
WSOPE Poker Room & Slots	Basement To Second Floor 5 - 6 Leicester Square	Converted Casino
Ladbrokes	118-120 Shaftesbury Avenue London W1D 5EP	Providing facilities for other betting
Ladbrokes	39-41 Charing Cross Road London WC2H 0AR	Providing facilities for other betting
William Hill	18 Newport Court London WC2H 7JS	Providing facilities for other betting
Las Vegas	89-91 Wardour Street London W1F 0UB	Operation of an adult gaming centre
Betfred	32 Gerrard Street London W1D 5PP	Providing facilities for other betting
The Casino At The Empire	Basement To Second Floor 5 - 6 Leicester Square	Converted Casino
Joe Jennings Bookmakers	3-5 Wardour Street London W1D 6PB	Providing facilities for other betting
Genting Casino London China Town	93-107 Shaftesbury Avenue London W1D 5DY	Converted Casino
Coral	Basement And Ground Floor 30 Frith Street Lond	Providing facilities for other betting
Family Leisure Co	32 Wardour Street London W1D 6JJ	Operation of an adult gaming centre
Coral	1-3 Newport Place London WC2H 7JR	Providing facilities for other betting
William Hill	121-125 Charing Cross Road London WC2H 0EA	Providing facilities for other betting
Ladbrokes	39 Wardour Street London W1D 6PX	Providing facilities for other betting
Golden Nugget Casino	22-32 Shaftesbury Avenue London W1D 7EU	Converted Casino
William Hill	Ground Floor 22 Greek Street London W1D 4DY	Providing facilities for other betting
Ladbrokes	Third Floor 45 Gerrard Street London W1D 5QQ	Providing facilities for other betting
William Hill	Basement 33 Brewer Street London W1F 0RU	Providing facilities for other betting
Napoleon's Casino	Basement Queens House 1 Leicester Place Lond	Converted Casino
Paddy Power	Ground Floor 40 Gerrard Street London W1D 5QE	Providing facilities for other betting
Ladbrokes	112 Shaftesbury Avenue London W1D 5EJ	Providing facilities for other betting
G Casino Piccadilly	3 - 4 Coventry Street London W1D 6BL	Converted Casino
The Hippodrome Casino	The Hippodrome Cranbourn Street London WC2F	Converted Casino
Crystal Rooms	Basement And Part Ground Floor 7 - 9 Cranbourn	Facilities for the playing of bingo
William Hill	55 Charing Cross Road London WC2H 0NE	Providing facilities for other betting