

# National Training Conference 2025



## Gambling Act Reform- At Last

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# Gambling Update

Key changes introduced by the Gambling Act Review 2025 Reforms

Our experience lodging GAR applications

What's coming next?

Difficulties and challenges faced by the Industry



# Development of the GB Gambling Acts

- GB casinos operate under The Gambling Act 2005, however the majority maintain grandfather rights from The Gambling Act 1968.
- The 2005 Act introduced three new types of casino licences with defined size and machine entitlements:
  1. **Regional Casino (never implemented)**
  2. **Large Casino**
  3. **Small Casino**

## The Gaming Act 1968

Legislation introduced to regulate the gambling industry in which Casinos were required to obtain licences from the Government and adhere to strict operational regulations.

In the years following the enactment of the Gaming Act, Great Britain witnessed a gradual rise in the number of licensed casinos in “permitted areas” which emerged to become societal hubs for leisure and hospitality.

## The Gambling Act 2005

Replaced the outdated provisions from the Gaming Act of 1968, adapting to the evolving landscape of the gambling industry.

Casino operators with licences granted under the Gaming Act 1968 were eligible to be granted a casino premises licence under ‘grandfathering’ arrangements.



## Grandfather Rights

Grandfather rights were also introduced as part of the 2005 Act, Schedule 18. Casinos licensed under the 1968 Act were granted “**converted**” casino licences.

These licences preserved existing entitlements, including:

1. Up to 20 Category B–D machines (or unlimited C/D machines).
2. No mandatory table-to-machine ratio.
3. Operators could relocate within the same licensing authority area via variation.

These converted casinos were not subject to the new size or machine limits imposed on 2005 Act casinos.



Following the 2005 Act and before the Gambling Act Review, there existed three types of casinos:

1. Small 2005 Casinos
2. Large 2005 Casinos
3. Converted 1968 Act Casinos

Each casino type had different requirements and machine allowances.

Casino Type	Machine to table ratio	Maximum machines allowed
Small 2005 casinos	2:1	Up to 80
Large 2005 casinos	5:1	Up to 150
Converted casinos	No machine-to-table ratio	Up to 20

Pre-GAR:  
Casino types  
& allowances

# The GAR White Paper: ‘High Stakes: Gambling Reform for the Digital Age’

- One of the aims of the Gambling Act Review White Paper was to **modernise the regulation of land-based gambling**, which had considerably lagged behind the fast-evolving online sector.
- The “High Stakes: Gambling Reform for the Digital Age” is a 268 page document, covering a raft of proposed changes, from ‘on-line protections through to land based gambling’.
- Following extensive consultation and legislative drafting, changes were enacted via Statutory Instruments, effective 22 July 2025.
- These reforms target outdated restrictions, **particularly around gaming machine allowances**, to create a more consistent and commercially viable framework for casinos.





# White Paper Implementation

## December 2020

The Department for Digital, Culture, Media and Sport (DCMS) launched a review of the Gambling Act 2005 to assess whether it was still fit for purpose in the digital age.

## April 2023

White Paper '*High Stakes: Gambling Reform for the Digital Age*' was published on 27 April (Originally expected by end of 2021, but delayed due to political changes).

## 26 July - 4 October 2023

DCMS held a public consultation. In response, it introduced changes granting existing casinos under the Gambling Act 2005 access to new allowances, subject to specific conditions.

## 22 July 2025

A series of statutory instruments were enacted to deliver the proposed changes for casino licensed premises

## 2024

The new government reviewed the proposals to modernise the rules for casinos and decided to implement the changes as outlined in the previous government's consultation.



# Statutory Instruments

The statutory instruments listed below, which came into effect on 22 July 2025, have been enacted to implement the proposed reforms for casino licensed premises. These generally amend the existing supplementary gambling legislation.

The Gambling Act 2005 (Commencement No. 6 and Transitional Provisions) (Amendment) Order 2025

The Casinos (Gaming Machines and Mandatory Conditions) Regulations 2025

The Gambling Act 2005 (Premises Licences and Provisional Statements) (Amendment) (England and Wales) Regulations 2025

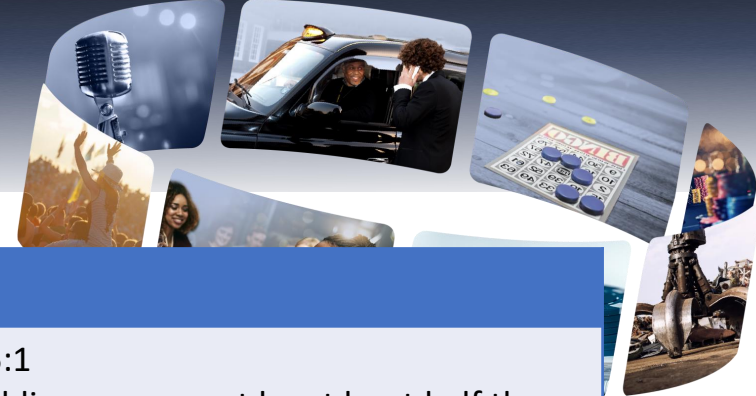
The Gambling Act 2005 (Gaming Tables in Casinos) (Definitions) (Amendment) Regulations 2025



The Gambling Act 2005  
(Commencement No. 6 and Transitional Provisions)  
(Amendment) Order 2025

This Order introduces the following changes for converted casinos that **choose to opt into the extended entitlement**

Key Change	Explained
Gaming Machine Allowance	Permits the holder of a converted casino premises licence to offer <b>up to 80 gaming machines</b> , subject to a sliding scale that applies where the <b>gambling area measures at least 280m<sup>2</sup></b> and the <b>total number of machines does not exceed five times the number of live gaming tables in use at the premises</b> (Gaming machines : live gaming tables = up to 5 : 1)
Gaming Machine Cap For Connected Casinos	Where two or more converted casinos are co-located or adjacent, the total number of machines across them is capped at 80. <b>This cap applies only to casinos exercising the extended entitlement, but all machines in connected converted casinos count toward the 80 machine limit, regardless of whether each has opted in.</b>
No Reversion	Casinos that adopt the new extended allowances <b>cannot revert to their previous machine limits.</b>
Updated Definition Of Gaming Table	<b>Amends the definition of a gaming table</b> for converted casinos, in line with the changes made by the Gambling Act 2005 (Gaming Tables in Casinos) (Definitions) (Amendment) Regulations 2025
Betting Permitted	Converted casinos <b>may now offer betting facilities.</b>
Reviews	The Secretary of State must review these provisions within five years of commencement.



# The Casinos (Gaming Machines and Mandatory Conditions) Regulations 2025

Casino Type	Changes Introduced
EXTENDED CONVERTED CASINOS (new category for those using increased machine entitlement)	<ul style="list-style-type: none"> <li>Machine-to-table ratio of 5:1</li> <li>Table gaming and non-gambling areas must be at least half the gambling area or 250m<sup>2</sup>, whichever is smaller</li> <li>Gambling area must be less than 1,500m<sup>2</sup>, unless already ≥1,500m<sup>2</sup> on 12 May 2025</li> <li>Betting positions capped according to gambling area size</li> <li>Area calculations must follow the method set out in the instrument</li> </ul>
LARGER CONVERTED CASINOS (≥200m <sup>2</sup> gambling area, not using extended entitlement)	<ul style="list-style-type: none"> <li>Gambling area must be less than 1,500m<sup>2</sup>, unless it was already ≥1,500m<sup>2</sup> on 12 May 2025</li> <li>Betting positions capped according to gambling area size (as set out in the instrument)</li> <li>Gambling and non-gambling areas must be calculated in accordance with the prescribed method in the instrument</li> </ul>
SMALL 2005 ACT CASINOS	<ul style="list-style-type: none"> <li>Machine-to-table ratio increased from 2:1 to 5:1</li> <li>Minimum table gaming area reduced from 500m<sup>2</sup> to 250m<sup>2</sup></li> </ul>
OTHER CONVERTED CASINOS (<280m <sup>2</sup> gambling area)	<ul style="list-style-type: none"> <li>Maximum of 16 separate betting positions</li> </ul>



## Table Gaming Area – Small 2005 Act Casinos

- The Casinos (Gaming Machines and Mandatory Conditions) Regulations 2025 notably changed the rules on table gaming in which Small 2005 Act casinos are now required to have **only 250m<sup>2</sup> of table gaming space**, down from 500m<sup>2</sup>.
- This better matches their overall gambling area and mirrors the ratio used for large casinos.
- The change gives smaller venues more flexibility, while still ensuring customers get a mix of table games, electronic gaming, and non-gambling options.



# Gambling Vs Non- gambling Area – Extended Converted Casinos

The Casinos (Gaming Machines and Mandatory Conditions) Regulations 2025 also determined the **gambling area vs non-gambling area size requirements for casinos that choose to opt into the extended entitlement** (extended converted casinos).

## Gambling Area

The **total gambling area** for extended converted casinos **must not exceed 1,500m<sup>2</sup>**, however those casinos where the gambling area was 1,500m<sup>2</sup> or greater on 12th May 2025 are exempt.

## Non-gambling Area

Extended Converted casinos must designate a **non-gambling area** that is:

- **At least 50% of the gambling area, or**
  - **A minimum of 250m<sup>2</sup>, whichever is smaller.**
- This area must be clearly marked and used for non-gambling purposes (e.g. hospitality, entertainment, etc).
- **Applies only to converted casinos that opt into the extended machine entitlement regime.**
  - Casinos retaining the standard entitlement are not subject to this requirement.

The Gambling Act  
2005 (Premises  
Licences and  
Provisional  
Statements)  
(Amendment)  
(England and  
Wales) Regulations  
2025

- This Regulation allows holders of converted casino premises licences who wish to use the new entitlements to:

1. Apply to the relevant licensing authority to vary their licence to become an **extended converted casino licence**
2. Update the casino layout plan to show the location and extent of any designated table gaming area

This ensures that licensing authorities have clear visibility of operational changes linked to the extended entitlements.





# The Gambling Act 2005 (Gaming Tables in Casinos) (Definitions) (Amendment) Regulations 2025

- These Regulations amend the 2009 Definitions Regulations to clarify **what qualifies as a “gaming table”** under section 172(3)–(5) of the Gambling Act 2005.

Ensures that **only live, multi-player tables operated by casino staff count as gaming tables** for the purpose of calculating gaming machine allowances.

Products that **operate without staff involvement do not qualify as gaming tables**, for example where the player presses a switch or button, or pulls a lever to release a set of balls.

Under section 172, the number of gaming machines in a casino is subject to **both a fixed maximum amount and a ratio linked to the number of qualifying gaming tables**.

- Operators have already begun applying for new entitlements under the new framework.
- Existing licences may remain unchanged if preferred.



# Implications and Associated Applications

How the new regulations will affect casino operators intending to implement them.



# Operating Licence

For operators of casino premises that intend to make use of the regulatory changes, they will be required to carry out corresponding licensing and notification requirements.

## Converted Casinos

- Licensees intending to use the new extended entitlements **must notify the Gambling Commission** under LCCP Ordinary Code Provision 8.1.1 (Information requirements).
- Operators should **assess whether an operating licence variation is needed** due to changes in:
  - Fee category
  - Licensed activities (such as betting)

## Betting Facilities

- To offer non-remote betting, casinos require a non-remote general betting (standard) operating licence.
- To offer self-service betting terminals (SSBTs), casinos must hold a remote general betting (standard) (real events) licence.
- An ancillary remote betting licence cannot be used for SSBTs in casinos, as it is tied to a betting premises licence.

## Small 2005 Act Casinos

- Small 2005 Act Casinos adopting the new 5:1 machine-to-table ratio or the reduced 250m<sup>2</sup> minimum table gaming area **must apply to their local licensing authority to vary their premises licence**, reflecting the changes to gambling and non-gambling areas.



Variation applications made in order to access the new entitlements under the 2025 Regulations will be processed in the same way as any other premises licence application.

### Section 187 of the Gambling Act 2005

- Section 187 applies to variations to premises licences. Subsection (1)(a) specifically addresses changes involving the addition, amendment, or removal of authorised activities.
  - Where the new Regulations expand existing entitlements (e.g. allowing converted casinos to offer betting), this does not constitute the addition of a new authorised activity under Section 187(1)(a). Therefore, a variation application is not required solely to reflect that change.
  - However, if **the change involves a modification to the premises layout, such as repurposing non-gambling areas for gambling use, then a variation application is required.**

**Additionally, if a condition attached to the existing premises licence prohibits the proposed change, the operator must apply to vary the licence to amend or remove that condition.**

Updated LARAs must also be completed

# Premises Licences



# Premises Licences: Plans

- Under the Gambling Act 2005 (Premises Licences and Provisional Statements) Regulations 2007, all premises licence applications must include a **scale plan** showing the **gambling and non-gambling areas**.
- **If a non-gambling area is to be used for gambling, this constitutes a material change and requires a variation.**
- Regulation 3 of the Mandatory and Default Conditions Regulations 2007 requires the premises layout to be maintained in accordance with the approved plan. **Any deviation from this layout must be authorised via a licence variation.**

## Extended Gaming Machine Allowances

- Converted casinos seeking to use the extended entitlement must apply to vary their premises licence to include the **location and extent of the table gaming area** on the premises plan. This requirement applies even if no other changes are made to the gambling or non-gambling areas.

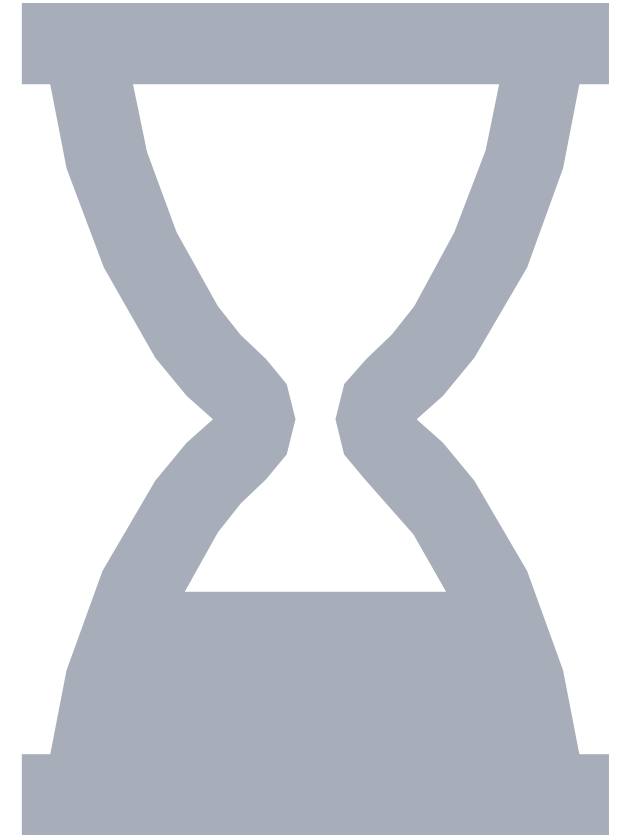


# Premises Licences: The Timeline – A race against the clock!

The first sniff of actual regulatory reform came in April 2025, with the final statutory instruments being released on 13 May 2025

There was no early release of:

- **Licensing guidance** - Regulatory interpretation was left to speculation, increasing the risk of non-compliance
- **Technical specifications for layout plans**
- **The final GC guidance** (including updated GLA) was not released until October.





Given the lack of early access to key documentation, we recognised the need to take proactive steps to ensure we were prepared for the GAR reforms. This involved:

**Early engagement with clients and Local Authorities**

We initiated pre-reform discussions with operators and Local Authorities to discuss the anticipated regulatory changes and compliance requirements and to determine the corresponding measures they would seek to implement.

**Assessing each individual site**

We examined each casino site individually to consolidate the operators' desired changes to gaming areas, additional machines and required adjustments to table vs non-table gaming areas to comply with the GAR reform changes.

**Drafting new layout plans**

We developed layout plans based on anticipated regulatory conditions. These plans included:

- Additional machine placements in line with new allowances
- Clear markings of table vs non-table gaming areas
- Compliance with projected ratios for gaming floor distribution under the new framework

# Our approach



## The Outcome

When the statutory instruments were finally enacted on 22<sup>nd</sup> July, we were able to act immediately, submitting compliant applications.

Our proactive approach enabled us to lodge 52 applications to 29 Local Authorities on Day One.

A number of others have since been submitted.



# Challenges faced by us and the Licensing Authorities

Following the implementation of GAR 2025, we inevitably encountered several challenges.

Difficulties that we faced included:

- Inconsistent interpretations across licensing authorities
- Lack of clarity on plan requirements
- Confusion around “Extended Converted Casino” terminology (and how to issue new licence)
- Queries surrounding ‘parked’ licences





## Ongoing issues and Reps

- Several Local Authorities were, understandably, stumped. Conversations helped to alleviate concerns – the majority simply being ‘what are these new regulations’!
- LA’s were cooperative and helpful, additional information such as machine numbers and LARAs being provided as needed
- Only representations came from a Ward Councilor – predominantly surrounding a perceived lack of information and concerns about the ability of the premises to promote the licensing objectives



# What next?

- What more can be expected concerning the GAR reforms?
- What other developments have we seen recently in the Gambling Industry?



# GAR Reforms: Scotland

- While some elements of the casino regulatory framework are devolved, others remain reserved. Scotland is only covered by **two** of the measures within these reforms.
  1. Machine-to-Table Ratio - Section 172(5)(b)(i) of the Gambling Act 2005 is amended to **increase the ratio for Small 2005 Act casinos from 2:1 to 5:1**
  2. Gaming Table Definition - In 2005 Act casinos, **only tables for multi-player live gaming, operated by a casino dealer, are eligible to be included in assessments of the machine to table ratio.**
- **Powers to amend gaming machine entitlements** are reserved to the UK Government. However, the power to implement **protective measures necessitated to accompany such changes** is devolved to the Scottish Government. The UK Government has stated it will not implement further deregulatory changes in Scotland unless appropriate protective measures are agreed.

**Moving forward, the Scottish Government** has indicated interest in exploring **additional reform measures** so we may see further GAR reforms enacted in Scotland in the near future.



# GAR Reforms: The Gambling Commission

- Tim Miller’s speech at the ‘Peers for Gambling Reform Gambling Summit’ on 3 September 2025 highlighted the Gambling Commission’s progress and future direction in implementing reforms from the Gambling Act Review White Paper. Within his speech, he emphasised the need to evaluate reforms rather than constantly push for new ones.
- He further stated that the Gambling Commission is working with DCMS and the National Centre for Social Research to **assess what works, what doesn’t, and what adds unnecessary burden.**
- He also maintained that **local authorities, not the Commission, are responsible for inspecting gambling premises.** The Commission will continue to support local regulators but won’t fill gaps caused by under-resourced councils.
- He concluded his statement by looking to the future, saying:

*There will always be more to do and I do not expect that the implementation of the White Paper will be the end of the story when it comes to reform of gambling regulation in Britain. But my encouragement to all of those that have an interest in making gambling fair, safe and crime free is **do not allow a drive for future reforms to be at the expense of effective delivery and measurement of current reforms - because it is delivery, not further policy papers, that will actually protect consumers.***



# GAR Reforms: Local Authorities

Local authorities play a crucial role in the success of the Gambling Act Review reforms, especially in safeguarding consumers and ensuring compliance.

Moving forward, local authorities should ensure that:

- Regular inspections of gambling premises are conducted to ensure compliance in operators, especially those who have opted into the new entitlement
- Collaboration is made with the Gambling Commission to report non-compliance and share insights into operations
- Training for licensing officers and enforcement teams is provided to understand new regulations
- Collaboration with Operators is always helpful, most are very keen to work with their Local Authority.



# Premises Licences, Applications and Statements of Gambling Policy

Ongoing challenges with Premises Licences across the country



# Gambling saturation policies

## Further developments in the Gambling Industry:

On September 25 2025, the UK government released its "Pride in Place Strategy" policy paper. This policy document outlined the government's plans to give local communities greater authority and resources in order to boost social infrastructure, revive high streets and provide residents with greater control over their communities.

A notable part of this strategy will be the introduction of **Cumulative Impact Assessments (CIAs)** within gambling licensing.

- The effect of this introduction will be to grant local authorities the ability to establish a saturation policy in assessing gambling premises within an area to determine whether that area is overburdened by the presence of gambling premises.
- This is driven by the notion that limiting the density of gambling premises can be an effective tool in reducing public nuisance, disorder and the undermining of the Licensing objectives.
- Authorities who adopt such CIAs create a rebuttable presumption that applications for new premises licences within these over-saturated areas will normally be refused if relevant representations are received.

The Government determined that:

*"This will allow local authorities to take data-driven decisions on premises licences, particularly in areas that have been identified as being vulnerable to gambling-related harm. This will empower local authorities to better shape their high streets and neighbourhoods, and to ensure a healthy mix of premises in their town and city centres."*



# Gambling saturation policies: The Implications

The introduction of CIAs will become an important consideration factor for operators, licensing lawyers and local authorities when preparing and evaluating gambling licence applications.

## Operators and their licensing teams

Applications for premises located within a designated CIA area will require heightened scrutiny. Operators must carefully prepare applications that clearly demonstrate how the proposed premises would not contribute to increased gambling harm, including evidence and mitigation strategies to counter the presumption of refusal in saturated areas.

## Licensing authorities

Authorities will need to apply greater diligence when assessing applications within CIA areas. These areas will be automatically flagged as higher-risk in relation to gambling harm. However, any refusal must be underpinned by a strong evidential basis showing that additional gambling premises would undermine the objectives of the Gambling Act 2005.

The onus will ultimately rest on the applicant to prove that introducing a new gambling premises into an already saturated area will not exacerbate existing issues or create new risks.



# Public Health

- Are Public Health a Responsible Authority?
- Are Public Health an Interested Party?
- Responsible Authorities are: Licensing Authority, Gambling Commission, Police, Fire and Rescue, Planning, Environmental Health, Protection of Children from harm and HMRC
- Interested Parties are a person who: person—
  - (a) lives sufficiently close to the premises to be likely to be affected by the authorised activities,
  - (b) has business interests that might be affected by the authorised activities, or
  - (c) represents persons who satisfy paragraph (a) or (b).



Any questions?

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