

# Public Document Pack



## LICENSING COMMITTEE

Contact: [Democracy@enfield.gov.uk](mailto:Democracy@enfield.gov.uk)

Monday, 7 October 2024 at 7.00 pm  
Council Chamber, Civic Centre, Silver Street,  
Enfield, EN1 3XA

Direct : 020-8132-0807  
Tel: 020-8379-1000  
Ext: 0807  
E-mail: [democracy@enfield.gov.uk](mailto:democracy@enfield.gov.uk)  
Council website: [www.enfield.gov.uk](http://www.enfield.gov.uk)

Councillors: Mahym Bedekova (Chair), George Savva MBE (Vice-Chair), Mahmut Aksanoglu, Maria Alexandrou, Sinan Boztas, Hivran Dalkaya, Chris Dey, Guney Dogan, Elif Erbil, Peter Fallart, Alessandro Georgiou, Suna Hurman, Sabri Ozaydin, Paul Pratt and Jim Steven

## AGENDA – PART 1

1. **WELCOME AND APOLOGIES**
2. **DECLARATIONS OF INTEREST**

Members are asked to declare any disclosable pecuniary, other pecuniary or non-pecuniary interests relating to items on the agenda.

3. **REVISED LICENSING POLICY, GAMBLING POLICY, CASINO RESOLUTION & SEXUAL ENTERTAINMENT VENUE RESOLUTION**  
(Pages 1 - 182)

To present the Licensing Policy and the Gambling Policy post public consultation to the Licensing Committee prior to the report going to Cabinet with a recommendation to Full Council for adoption.

This page is intentionally left blank



## London Borough of Enfield

<b>Report Title</b>	Presentation of the revised Licensing Policy, Gambling Policy, Casino Resolution & Sexual Entertainment Venue Resolution.
<b>Report to</b>	Licensing Committee
<b>Date of Meeting</b>	7th October 2024
<b>Cabinet Member</b>	Cllr Susan Erbil, Cabinet Member for Planning and Regulatory Services
<b>Executive Director / Director</b>	Perry Scott - Executive Director of Environment and Communities Doug Wilkinson – Director of Environment & Street Scene
<b>Report Author</b>	Martin Rattigan Martin.rattigan@enfield.gov.uk
<b>Ward(s) affected</b>	All
<b>Key Decision Number</b>	KD 5740
<b>Classification</b>	Part 1

### Purpose of Report

1. It is a statutory requirement to have a Statement of Licensing Policy (“Licensing Policy” Appendix A) and a Statement of Principles for Gambling Licensing (“Gambling Policy” Appendix B), and to review every 5 years and 3 years respectively. This will be the 7<sup>th</sup> edition of the Licensing policy and the 7<sup>th</sup> edition of the Gambling Policy.
2. The purpose of the report is to present the Licensing Policy and the Gambling Policy post public consultation to the Licensing Committee prior to the report going to Cabinet with a recommendation to Full Council for adoption. Each policy has been updated and amended to reflect the need and aims of Enfield, its residents and businesses, and taking into consideration the consultation responses received. The policies are attached to this report.

3. A public consultation on both policies was carried out between the 17<sup>th</sup> of May and the 11<sup>th</sup> of August 2024.

## Recommendations

**That the Licensing Committee notes and recommends the following should be adopted by full Council:**

- I. The Statement of Licensing Policy (Appendix A) to come into effect on the 28<sup>th</sup> of January 2025.
- II. Retention of the existing four Cumulative Impact Zones in Upper Edmonton, Enfield Highway, Enfield Town and Southgate.
- III. Introduction of two new Cumulative Impact Zones in Bowes and Palmers Green.
- IV. Removal of the core hours in all Cumulative Impact Zones making them all 24 hours.
- V. Retention of the refusal to adopt the Sexual Entertainment Venues provisions under the Policing and Crime Act 2009. Presented in Annex 11 of the Licensing Act Policy.

**And that the Licensing Committee notes that the following proposals will be submitted to Cabinet prior to their onward submission to Full Council for approval:**

- VI. The Statement of Principles for Gambling (Appendix B)
- VII. Introduction of two new Gambling Vulnerability Zones in Edmonton and Enfield Highway.
- VIII. Retention of the nil casino resolution as set out in section 3.5 of the Gambling Policy.

## Background

4. The existing Licensing Act 2003 policy was last approved at full Council in 2019 and came into effect in January 2020. The Gambling Act 2005 policy was last approved at full Council in November 2021 and came into effect in January 2022.
5. Engagement with key Enfield stakeholders took place in early February 2024. This included Police Licensing, the Licensing Team and Public Health. Early views on both policies and the Cumulative Impact Assessment were collected and considered in drafting the pre-consultation draft of the Licensing Policy, the Gambling Policy and the Cumulative Impact Assessment.
6. Following the public consultation, we received 20 responses in relation to the Licensing Policy and 4 responses to the Gambling Act Policy.

7. Consultation responses for the Licensing Policy outlined support for the proposed Cumulative Impact Zones and noted concerns regarding better training and awareness relating to preventing and addressing violence against women and girls.
8. The table below outlines the concerns and changes made to reflect them.

Section	Change to Licensing Act Policy	Reference in policy
<b>Cumulative Impact Zones: Times</b>	Address concerns regarding an accumulation of licensed premises operating in the daytime by removing the core hours for the CIZs so the CIZs operate at all hours.	Section J: Page 25
<b>Cumulative Impact Zones: Conditions</b>	Address issues relating to public nuisance caused by blocking of footpaths and concerns regarding intimidation of women – by creating new model conditions for CIZ areas. Additional model conditions: <ul style="list-style-type: none"> <li>• training of staff relating to protection of women, girls and vulnerable people,</li> <li>• designation of smoking area, and</li> <li>• entry and exit of premises.</li> </ul>	Appendix 9: Page 57 & 58.
<b>Violence against Women and Girls</b>	Additional wording in Section L on page 27 has been added. As follows: 11.42 We expect all licensed premises to build an atmosphere of transparency and safety for women who work at night and engage in leisure in the licensed trade. This may include challenging behaviour that enables intimidation and violence against women in the licensed trade and providing support to those that experience these behaviours in licensed premises. Training for staff to support this is recommended.	Section L: Page 27

9. Following the consultation there are some changes to the Gambling Policy. All four responses were generally supportive. Three responses recommended adding Palmers Green as a Gambling Vulnerability Area. The reasons for not including Palmers Green are outlined in the next paragraph.
10. A proposal by responders for the inclusion by of Palmers Green into the Gambling Vulnerability Area is not supported by the evidence in the Local Area Profile. The Palmers Green Area has approximately 8 gambling premises, the Gambling Vulnerability Area, as mapped, has 31 gambling premises within it. As outlined in the Local Area Profile, Palmers Green is in the lower vulnerability range for mental health and wellbeing, Index of Multiple Deprivation, unemployment rates and receipt of Universal Credit.

11. The areas outlined in the Gambling Vulnerability area are in the highest vulnerability range for mental health and wellbeing, index of multiple deprivation, unemployment rates and the receipt of universal credit. The number of premises and the levels of vulnerability do not currently meet the threshold for Palmers Green to be made a Gambling Vulnerability Area at this time. It is noted that Palmers Green and Bowes areas would be kept under review throughout the life of this policy and assessed at the next review of the Gambling Policy in three years time.

12. See Appendix F for consultation response and the Council's reply.

### **Statement of Licensing Policy**

13. The London Borough of Enfield's Licensing Policy 2020 to 2025 is due to expire on 28<sup>th</sup> January 2025. The Council is required, under the Licensing Act 2003, to publish a Statement of Licensing Policy once every five years. Guidance on how this is to be done is detailed in the Licensing Act 2003 and in the Section 182 Guidance issued by the Home Secretary.

14. The requirement is for the Council to consult with key stakeholders and to update the Licensing Policy for changes in the legislation and guidance. The Licensing Policy has been revised to include updates to reflect this.

15. Key changes include:

- The Licensing Policy has been updated and now includes clear expectations from the Licensing Authority as to what matters applicants need to consider in drafting their applications and their operating schedules.
- New sections have been introduced to outline expectations in the following areas:
  - Addressing risks and harms to women and vulnerable people in the night-time economy (Section L);
  - Responding to the proposed Martyn's Law by outlining event and large venue safety and risk assessment (Section N).
  - The proposed introduction of two new Cumulative Impact Zones in Bowes and Palmers Green (Section J).
  - Policies outlining expectations on delivery services, (Section R) and the dispersal of patrons from premises (Section S).
- The Licensing Policy has also been updated for changes in laws and the Section 182 guidance. Including changes in pavement licences, a link to immigration status documentation and the inclusion of a policy to prepare for 'Martyn's Law'.

### **Sexual Entertainment Venues (SEV)**

16. To continue to resolve not to adopt the sexual entertainment venues licensing in Enfield, as per Annex 11 of the Licensing Policy. To date there have been no applications for SEVs.

### **Statement of Principles for Gambling Licencing.**

17. The Act places a legal duty on both the Commission and licensing authorities to aim to permit gambling, in so far as it is considered to be reasonably consistent with the pursuit of the licensing objectives. The effect of this duty is that both the Commission and licensing authorities must approach their functions in a way that seeks to regulate gambling by using their powers, for example, powers to attach conditions to licences, to moderate its impact on the licensing objectives rather than by starting out to prevent it altogether.
18. The London Borough of Enfield's Gambling Policy 2022 to 2025 is due to expire on 31 January 2025. The Gambling Act 2005, requires the Council, acting as the licensing authority to prepare, consult on and publish a Gambling Policy which it proposes to apply, when exercising its licensing functions under the Gambling Act 2005.
19. The Gambling Policy:
  - Sets out how the Authority intends to support responsible operators and take effective actions against irresponsible operators.
  - Informs residents, business and licensed premises users, the protections afforded to the local community within the Gambling Act 2005 and by this Authority.
  - Supports the Authority in making licensing decisions.
20. A refresh of evidence around the impact of gambling has been conducted and a Local Area Profile produced (See Appendix C).
21. The revised version of the Gambling Policy reflects updated guidance and legislation. The key change is the introduction of a proposed Gambling Vulnerability Area (GVA). This is an area that is intended to address particular vulnerabilities associated with harm from gambling and problem gambling. The intention is for those seeking gambling licences in the Gambling Vulnerability Area (mirroring the current Edmonton and Enfield Highway Cumulative Impact Zones under the Licensing Policy) to provide additional reassurance as to how they will address these vulnerabilities in their operating schedule.

### ***Gambling Vulnerability Area***

22. The Local Area Profile has outlined that some areas in Enfield are of particular risk for individuals both of developing problem gambling habits and of being more vulnerable to the impacts of problem gambling than many other areas in Enfield. In particular, levels of social and economic vulnerability are higher in some areas than in the rest of Enfield. Research evidence (outlined in Appendix D: Local Area Profile) shows that the risk of developing problem gambling habits and impact of this on individuals is higher where the individuals are:

- Economically vulnerable: such as being unemployed, being in receipt of universal credit, or being in an area of high deprivation as indicators for economic vulnerability.
  - Vulnerable due to mental health issues: such as having higher levels of depression and anxiety disorder in local areas as an indicator of the higher levels of risk that may be associated with gambling in these localities.
  - Exposed to higher levels of gambling premises and availability of opportunities to gamble or experience others' gambling in their youth: such as being in proximity to schools and childcare facilities.
23. The Local Area Profile has noted that the overlap of gambling premises and particular aspects of vulnerability are located in the area that is covered by the existing Edmonton and Enfield Highway Cumulative Impact Zones (in the Licensing Policy).
24. The policy requires that applicants in these areas will be expected to pay special attention to outlining the specific measures they will put in place to limit the risk to economically vulnerable people, those vulnerable due to mental health conditions and young adults as well as children. The Authority expects this to be a specific section of their operating schedule, and to ensure that staff are trained to be aware of these vulnerabilities and to be able to implement the specific measures outlined in their operating schedule.
25. Legally both the Licensing Policy and the Gambling Policy are required to be republished prior to 28<sup>th</sup> and 31<sup>st</sup> of January 2025 respectively. Both policies have been revised in line with statutory guidance and a public consultation required by their respective legislation and represent what is required to support the work of the Council in relation to both gambling and alcohol licensing.

### **Relevance to Council Plans and Strategies**

26. Both policies align to Priority 2: Strong, Healthy and Safe Communities Priority and Priority 5: An economy that works for everyone in Investing in Enfield: Council plan for 2023 – 2026.
- Licensed premises will be subject to inspection to ensure that they are complying with their respective legal requirements, ensuring a fair-trading platform.
  - Any complaints regarding premises will be investigated.
  - Licensed premises will provide employment opportunities.
27. Both the Licensing Policy and the Gambling Policy are a requirement of the Council under the Licensing Act 2003 and the Gambling Act 2005. As such they are a statutory requirement for the Council.

### **Financial Implications**



28. The purpose of the report is to present the Licensing Policy and the Gambling Policy post public consultation for adoption by Full Council. The proposed changes in both policies have no financial implications. The actual licencing fees and charges are subject to the Council's annual fees and charges full Council report – for both statutory and non-statutory fees and charges.

### **Legal Implications**

29. Both the Licensing Policy and the Gambling Policy are a requirement of the Council under the Licensing Act 2003 and the Gambling Act 2005. As such they are a statutory requirement for the Council and failure to update them would leave the council vulnerable to challenge.
30. The report shows the council wants to continue to not grant any sexual entertainment venue licences and therefore it must re-adopt this resolution as part of the Licensing policy. Further the council wishes to extend Cumulative Impact Zones [CIZ] into new areas, therefore these too need to be added to the policy. Failure to do so would mean they that could not be brought into force.
31. The Local Authorities (Functions and Responsibilities) (England) Regulations 2000 (as amended) specify that the functions of the Licensing Authority under the Licensing Act 2003 may not be carried out by the executive so this has to be approved by somebody other than the Cabinet. The Licencing Committee cannot under its terms of reference approve the policy but it can consider it and recommend it to Full Council for approval. The Cabinet will be asked to note the proposals, in the interests of completeness, when it considers the Gambling Policy. The same regulations provide, however, that the Gambling Policy under the 2005 Act may be developed by the executive but will also require approval by Full Council following a recommendation from the Cabinet. The Licensing committee does not have any powers under the Gambling Act 2005 but it will be asked to note the proposals, again in the interests of completeness, prior to it going to Cabinet.
32. Under section 166 of the Gambling Act 2005 the Council can adopt a “nil casinos” resolution. If this is not renewed every 3 years it automatically lapses. Since the Gambling Act 2005 came into force the council has always chosen to adopt such a resolution. It is also possible for any person or organisation to challenge the “nil casinos” resolution adopted by judicial review.

### **Equalities Implications**

33. An EQIA has been completed and attached. The EQIA identifies that the policies will have a positive affect in terms of:
- Ensuring the protection of person under the age of 18 from harm,
  - expectation that licensees consider ways in which they can protect vulnerable groups, including trans people, from violence, intimidation and exploitation in the night time economy and

- the introduction of Gambling Vulnerability Areas which are intended to reduce any additional impact of new gambling premises on those suffering socio-economic deprivation in the Edmonton and Enfield Highway areas.

### **Public Health Implications**

34. Public Health is a Responsible Authority under the Licensing Act 2003 and has an interest in a well managed licensed trade as it can be effective in reducing alcohol related health and wellbeing harms.
35. It is estimated that approximately 0.5% of the adult population has a problem with gambling, 3.8% are gambling at at-risk levels, and 7% are affected negatively by others people's gambling. This would imply that some 1,200 people in the borough are problematic gamblers and that 16,800 people are affected by other people's gambling.
36. Public Health is a Responsible Authority under the Licensing Act 2003 and has an interest in a well managed licensed trade as it can be effective in reducing alcohol related health and wellbeing harms. It is anticipated that the introduction of the two new gambling vulnerability zones will support and protect those most at risk of harm whilst allowing the industry to operate. Any learning from the Vulnerability Zones may be incorporated into future guidance and policies.

### **Crime and Disorder Implications**

37. Police are a Responsible Authority under the Licensing Act 2003 and the Gambling Act 2005, a well-managed licensed and gambling trade can help to reduce alcohol related crime and disorder and gambling related harm. Both the Licensing Act 2003 and the Gambling Act 2005 contain the prevention of crime and disorder as an objective.

---

**Report Author:** Martin Rattigan  
Interim Head of Regulatory Services  
[Martin.Rattigan@enfield.gov.uk](mailto:Martin.Rattigan@enfield.gov.uk)  
020 8132 0927

### **Appendices**

- Appendix A Statement of Licensing Policy
- Appendix B Statement of Gambling Policy
- Appendix C Cumulative Impact Zone Review
- Appendix D Local Area Profile
- Appendix E EQIA
- Appendix F Consultation Responses and Council reply

### **Background Papers**

- None.

ESS2425\_007

This page is intentionally left blank

**LONDON BOROUGH OF ENFIELD**

# **LICENSING ACT 2003**

## **LICENSING POLICY STATEMENT**

**Seventh Edition  
28 January 2025**



<b>SECTION</b>	<b>PAGE</b>
1. Purpose of the Statement of Licensing Policy	3
2. Scope of the Statement of Licensing Policy	5
3. Policy Statement	6
4. Consultation	7
5. Other matters for consideration	7
6. The Borough of Enfield	10
7. Factors for consideration	10
8. Principles and sections for consideration	12
9. General principles	12
10. Sections: Process and administrative	12
11. Sections: Expectations and considerations	24
12. Contact details	36
Annex 1 – Definitions	37
Annex 2 – 7 Cumulative Impact Assessment	38
Annex 8 – Summary of Age Restrictions	51
Annex 9 – Pool of Model Conditions	52
Annex 10 – Documents Which Demonstrate Entitlement To Work In The UK	60
Annex 11- Sexual Entertainment Venues	60

## Enfield Statement of Licensing Policy

### 1. Purpose of the Statement of Licensing Policy

- 1.1. This Licensing Policy Statement ('the Policy') is issued by the London Borough of Enfield ('the Council'), as Licensing Authority, under the Licensing Act 2003 ('the Act').
- 1.2. The purpose of this Statement of Licensing Policy ("licensing policy") is to outline the approach that Enfield Licensing Authority ("the Authority") will take for implementing the Licensing Act 2003. The policy provides guidance for applicants, residents and Responsible Authorities under the Act. Responsible Authorities include the Council's Licensing, Public Health, Health and Safety, Environmental Health, Planning, Trading Standards and Children's Services as well as the Police, the Fire Authority and the Home Office.
- 1.3. This policy, along with current national guidance issued by the Home Secretary and primary legislation as set out in the Licensing Act 2003, forms the basis on which licensing decisions are made and how licensed premises are likely to be permitted to operate.
- 1.4. The Licensing Act 2003 sets out four licensing objectives:
  - the prevention of crime and disorder;
  - public safety;
  - the prevention of public nuisance; and
  - the protection of children from harm.
- 1.5. The Authority is required to make decisions based on these objectives and to promote them through its actions. Licensed premises are required to conduct their activities with reference to the promotion of these objectives.
- 1.6. The Licensing Authority will have regard to this policy when carrying out its functions under the Licensing Act 2003 ("the Act").
- 1.7. The Act requires the Licensing Authority to publish this Statement of Licensing Policy. This licensing policy will be used as a guide in decision making with regard to licensing matters.
- 1.8. The Licensing Authority for the London Borough of Enfield makes this Statement of Licensing Policy in accordance with section 5 of the Act.
- 1.9. The Licensing Act 2003 also outlines five other key aims that are important for all those involved in licensing to support and promote through good practice. These are:
  - Protecting the public and local residents from crime, anti-social behaviour and noise nuisance caused by irresponsible licensed premises;
  - Giving the police and licensing authorities the powers they need to manage and police the night-time economy effectively and take action against those premises that are causing problems;
  - Recognising the important role which pubs and other licensed premises play in our local communities, and minimising the regulatory burden on business, encouraging innovation and supporting responsible premises;
  - Providing a regulatory framework for late night refreshment, and regulated

entertainment which reflects the needs of local communities and empowers local authorities to make and enforce decisions about the most appropriate licensing strategies for their local area; and

- Encouraging greater community involvement in licensing decisions and giving local residents the opportunity to have their say regarding licensing decisions that may impact upon them.

1.10 This policy:

- Outlines the legal framework and responsibilities under the Licensing Act 2003 and the accompanying Section 182 Guidance issued by the Home Secretary (“the Guidance”);
- Makes clear the expectations that those engaging in licensable activities in Enfield may have of the Authority and other licensing partners, including clear and transparent processes.
- Makes clear the expectations the Authority has for those engaging with the licensing system in Enfield including licence holders, licence applicants, residents and Responsible Authorities; and

1.11 The aim is to make the Licensing system in Enfield as clear, simple and accessible as possible. To this end the policy sets out the following:

- A clear statement of the legal framework for the policy and its links to other legal frameworks and strategies;
- The Enfield context and the aspirations and intent of the policy within that context;
- The Licensing objectives and the measures expected to promote them as required by law;
- Twenty-two (22) easy to find, separate sections which provide more detailed guidance on the approach the Licensing Authority will take to specific issues and circumstances; and,
- Appendices that provide useful further information.

1.12 Each new licence application or an application for a variation of an existing licence will be considered on its own merits. This means that decisions will take into account the specific details in each case, including the proposed venue and the way it will operate, or proposed changes to an existing venue and/or its operation, as well as the context in which it operates.

1.13 Section 5 of the Licensing Act 2003 requires each Licensing Authority to prepare and publish a Statement of its Licensing Policy every five years. The previous Enfield policy was published on 28 January 2020. This current Statement of Licensing Policy reflects changes in legislation and local policy, and feedback to date around ease of use of the previous document and has been updated accordingly. This policy will apply from 27 January 2025 to 26 January 2030.

1.14 The legislation allows the Authority to review and update its Licensing Policy during this time to reflect any changes in legislation or guidance.

1.15 In the drafting of this policy the Authority has had regard for the Home Office Guidance issued under Section 182 of the Licensing Act (“the Guidance”) and has given appropriate weight to the views of consultees. When revisions of the guidance are published the Authority will determine if revisions of this Licensing Policy are appropriate.



- 1.16 The Authority is allowed under the Act and the guidance to review and reissue the Licensing Policy within the 5-year timeframe if this is deemed necessary. To this end the Authority will conduct a mid-point review of the Licensing Policy to determine if there is need review and re-publishing. This process is outlined in detail in Policy 8.
- 1.17 The Policy supports the Council's vision for **Enfield to have clean and green spaces, strong healthy and safe communities, thriving children and young people, more and better homes, and an economy that works for everyone.**<sup>1</sup>

## 2. Scope of the Statement of Licensing Policy

- 2.1. The scope of the policy is the oversight and management of the provision and holding of licences under the Licensing Act 2003. The Act regulates the following licensable activities:
- Retail sale of alcohol;
  - Supply of alcohol to club members;
  - Supply of hot food and drink between 23:00 and 05:00;
  - Provision of regulated entertainment to the public, or club members, or with a view to profit;
  - Film exhibitions;
  - Performances of a play;
  - Indoor sporting events;
  - Boxing or wrestling entertainment;
  - Playing of recorded music; and
  - Dance performances.
- 2.2. There are a number of exemptions and details of these are set out in full in Part 2 of Schedule 1 of the Licensing Act 2003.
- 2.3. Section 191 of the Licensing Act 2003 provides the meaning of 'alcohol' for the purposes of the Act. It should be noted that a wide variety of foodstuffs contain alcohol but generally in a highly diluted form when measured against the volume of the product. For the purposes of the 2003 Act, the sale or supply of alcohol which is of a strength not exceeding 0.5 per cent alcohol by volume (ABV) at the time of the sale or supply in question is not a licensable activity. However, where the foodstuff contains alcohol at greater strengths, for example, as with some alcoholic jellies, the sale would be a licensable activity.
- 2.4. The definition of alcohol was amended by the Policing and Crime Act 2017 to include alcohol 'in any state'. This is to make it clear that products such as powdered and vaporised alcohol fall within the definition provided by the 2003 Act.<sup>2</sup>

<sup>1</sup> Investing in Enfield: Enfield Council Plan 2023-26 [https://www.enfield.gov.uk/\\_\\_data/assets/pdf\\_file/0022/34087/Enfield-Council-Plan-2023-2026-Your-Council.pdf](https://www.enfield.gov.uk/__data/assets/pdf_file/0022/34087/Enfield-Council-Plan-2023-2026-Your-Council.pdf)

<sup>2</sup> Revised guidance issued under Section 182 of the Licensing Act 2003 (December 2023)

<https://www.gov.uk/government/publications/explanatory-memorandum-revised-guidance-issued-under-s-182-of-licensing-act-2003/revised-guidance-issued-under-section-182-of-the-licensing-act-2003-december-2022-accessible>

- 2.5. Licensable activities are covered through application to the Council, acting as the Licensing Authority, for a licence to undertake them. These include applications for new premises licences, club premises certificates, variations to these and reviews of licences and/or certificates.
- 2.6. The scope of the policy will be subject to revisions to the Licensing Act as set out in the Guidance as issued by the Home Office from time to time<sup>3</sup>. When revisions are issued, there may be periods of time where the published Enfield Licensing Policy is inconsistent with the Guidance. During such periods the Council, as the Licensing Authority, will have regard, and give appropriate weight, to the revised Guidance.

### **3. Policy Statement**

- 3.1 The purpose of the Policy is to inform Members, applicants, residents and businesses of the key principles under which the Council will make licensing decisions.
- 3.2 Every application considered by the Council under this Policy, will be considered on its merits where relevant representations are made in respect of any application and a hearing is convened and regard is given to the Act and the Guidance and any supporting regulations.
- 3.3 The Council maintains that licensing is about the control of licensed premises, qualifying clubs and temporary events within the terms of the Act and any terms and conditions attached to licences will be focused on matters that are within the control of individual licensees and in the vicinity of premises.
- 3.4 The Crime and Disorder Act 1998 promotes the practice of partnership working to reduce crime and disorder and places a statutory duty on police and local authorities to develop and implement a strategy to tackle problems in their area. In doing so, the responsible authorities are required to work in partnership with a range of other local public, private, community and voluntary groups and with the community itself.
- 3.5 This approach recognises that both the causes of crime and disorder and the interventions required to deliver safer, more secure communities lies with a range of organisations, groups and individuals working in partnership. Crime reduction is not solely the responsibility of the police.
- 3.6 For people in the community the quality of their life in their neighbourhoods is affected by a whole range of influences. Quite rightly, they do not apportion responsibility for solutions uniquely to each individual agency and as part of our own community, we recognise situations in which the actions of one agency can positively contribute to the work of another. Local organisations working together can collectively provide interventions and responses to tackle problems and provide earlier, more effective solutions.

### **4. Consultation**

---

<sup>3</sup> Ibid.

- 4.1 The Policy is made following consultation with (amongst others):
- The Chief Officer of Police;
  - The London Fire Brigade;
  - The Council's Director of Public Health
  - Bodies representing local holders of premises licences;
  - Bodies representing local holders of club premises certificates;
  - Bodies representing local personal licence holders;
  - Bodies representing businesses and residents in the Council's area.
- 4.2 A public consultation was also undertaken and received X responses.
- 4.3 All consultations responses have been considered and where appropriate have informed the development of the final licensing policy.

## **5. Other matters for consideration**

### ***Developing local knowledge***

- 5.1 Demonstrated knowledge about the locality will assist applicants when determining the steps that are appropriate for the promotion of the licensing objectives. For example, premises within close proximity to residential premises should consider how this will impact upon their smoking, noise management and dispersal policies, to ensure the promotion of the public nuisance objective. Applicants must consider all factors which may be relevant to the promotion of the licensing objectives, and where there are no known concerns, to acknowledge this in their application.
- 5.2 Applicants are advised to carry out their own research, and potentially to seek the views of responsible authorities before formally submitting an application, as the authorities are best placed to have detailed and expert local knowledge about local issues that should be taken into consideration when making an application. It should be noted that there may be a charge for this service.
- 5.3 It is also expected that applicants will canvass the views of their neighbours and local residents as this can clear up any ambiguities and develop a relationship based on mutual cooperation before an application is made. This may be facilitated by making direct contact with neighbours and any local group that represents residents or businesses. This will also assist the applicant by giving an understanding at the outset of what the community believe is acceptable in their area.

### ***Operating schedules***

- 5.4 An Operating Schedule is submitted with a licence application and contains the information required by section 17(4) of the Act. Among other things, it includes the steps that the applicant proposes to take to promote the Licensing Objectives. Where a risk to the Licensing Objectives is present, the Council expects applicants to specifically

address in their operating schedules, how they will meet the Factors for Consideration (outlined in part 8 below).

- 5.5 Whilst applicants are strongly encouraged to consider these Factors for Consideration, they should not be regarded as standard conditions and should be used and modified according to the individual application and location and to inform the operating schedule. By setting out a carefully considered operating schedule applicants can demonstrate that they have given thought to their application and its impact on the local environment.
- 5.6 An operating schedule should contain details relating to the promotion of the licensing objectives that are capable of being translated into enforceable conditions as, if there are no representations against the grant of the licence these will form the basis of the conditions that will be placed on the licence. It is recommended that applicants use the 'general' box in section P of the application form to indicate what local factors they have considered. Information on the application process is in Policy 1 of this document and further guidance is available on the Council's website.
- 5.7 The failure by an applicant to clearly and fully demonstrate in the operating schedule that they have properly considered the promotion of the four licensing objectives is a legitimate concern should the application come before the Licensing Sub-Committee and may trigger a representation from the Authority.

#### ***The Mayor of London's Vision for London as a 24-hour City***

- 5.8 The Mayor of London has outlined his vision for London as a 24-hour City and has appointed a Night Czar and a Nighttime Commission to encourage the development of London as a vibrant, diverse, cultural city with a nighttime economy that is of global significance.
- 5.9 There is a vibrant, diverse and cultural nighttime economy offer across the borough. People living within and outside of Enfield will find entertainment, socialising and dining options that are reflective of a wide range of influences, origins and cultural aspects. Whilst the Mayor's Vision will be considered and reflected in the licensing system in Enfield, the Authority recognises that these ambitions need to be balanced against the needs and wishes of residents and other businesses and that the Authority's overriding duty is to promote the Licensing Objectives.

#### ***Responsibilities under the Immigration Act 2016 and the Modern Slavery Act 2015***

- 5.10 The Authority has responsibilities that relate to the prevention of immigration crime, specifically the prevention of illegal working in licensed premises. These responsibilities are outlined in this policy in Appendix 3. The London Borough of Enfield has a duty under the Modern Slavery Act 2015 to co-operate with the Independent Anti-Slavery Commissioner, and the Authority is also under this duty as part of the London Borough of Enfield.
- 5.11 Please see Annex 10 for further details on documentation required.

#### ***Health Act 2006***

- 5.12 It is expected that all licence holders will be compliant with the Health Act 2006 and all sundry Smokefree Regulations that govern smoking in licensed premises currently and as these are updated.

### ***London Living Wage***

- 5.13 Enfield is a London Living Wage employer and applicants are encouraged to pay staff a living wage.

### ***Other regulatory regimes***

- 5.14 It is important for all licensees and licence applicants consider and implement all other regulatory and legislative frameworks that are relevant to their premises and licence.

### ***Integration of policies and avoidance of duplication***

- 5.15 The Authority will seek to avoid any duplication with other statutory/regulatory frameworks.

### ***Public Space Protection Order***

- 5.16 The Council has adopted powers to designate the whole borough as a place where alcohol may not be consumed publicly and falls under the Public Space Protection Order published on 4 February 2021 and replaced the previous Public Space Protection Order. This Public Space Protection Order.

### ***Consideration of principles and sections in this document***

- 5.17 Applicants are also invited to consider the principles and sections outlined in the second part of this document. The general principles are intended to guide the overall approach to licensing and the nighttime economy in Enfield. The first set of policies are intended to outline administrative processes and expectations to support applicants and licensees to operate their businesses in an administratively effective manner. The second set of policies are intended to outline expectations that the Authority has for the specific issues and matters that are relevant to the way licensed businesses are run and organised.

## **6 The Borough of Enfield**

- 6.1 Please see the Enfield Council borough profile at:  
[https://www.enfield.gov.uk/data/assets/pdf\\_file/0023/44717/Borough-profile-2023-Your-council.pdf](https://www.enfield.gov.uk/data/assets/pdf_file/0023/44717/Borough-profile-2023-Your-council.pdf)

## **7. Factors for consideration**

06.09.24 V13

- 7.1 To give effect to the licensing objectives the Authority expects licence applicants to consider the following factors when preparing their applications and their operating schedules.
- 7.2 Prevention of Crime and Disorder - the means by which crime and disorder will be or is prevented by the effective management and operation of the licensed activities including, and not limited to:
- crime prevention design, including adequate lighting of car parks and CCTV;
  - door supervision, including arrangements for screening for weapons and drugs;
  - other measures to control violent, drunken or abusive behaviour (including exclusion of troublemakers; refusal to sell to those who are or appear to be drunk or underage; use of toughened and plastic 'glasses'; and bottle bins);
  - drug dealing and abuse;
  - prostitution and indecency;
  - methods to discourage drinking of alcohol supplied for consumption on the premises, in a public place in the vicinity of the premises;
  - methods to prevent taking alcohol off the premises in open containers;
  - methods to prevent the handling and distribution of stolen, counterfeit goods or other illegal goods;
  - capacity limits where necessary to prevent overcrowding or prevent nuisance upon entry and exit;
  - appropriate ratio of tables and chairs to customers (based on the capacity) where the premises are used exclusively or primarily for the 'vertical' consumption of alcohol;
  - irresponsible alcohol promotion.
- 7.3 Public Safety - the means by which risk to public safety will be or is prevented by the effective management and operation of the licensed activities including, and not limited to:
- whether the premises has a licence or other authorised document specifying the maximum number of persons that can attend it;
  - whether the applicant has carried out a fire risk assessment as to the maximum number of people who can attend the premises safely and evacuate it in an emergency;
  - measures to record and limit the number of persons on the premises;
  - the adequacy of transportation arrangements to ensure that customers may safely travel to and from the premises and nuisance is avoided by concentrations of people unable to access transport in a timely manner;
  - confirmation that any arrangements or advertising of taxis solely relate to taxis licensed by a recognised licensing authority;
  - arrangements to ensure the safety for users, including people with disabilities, in the event of fire or other emergency;
  - measures to address drink spiking;
  - the safe storage and use of special effects such as fireworks or other explosives, firearms, real flame, strobe lighting / lasers etc;
  - for dance events, the provision of measures to combat overheating, including availability of drinking water, air conditioning and ventilation.
- 7.4 Prevention of Nuisance - the means by which nuisances will be or are prevented by the effective management and operation of the licensed activities including, and not limited to:
- noise from delivery vehicles;

- noise from vehicles delivering and collecting customers;
- noise and/or vibrations emanating from the premises including extended/external areas such as beer gardens;
- noise, anti-social behaviour and other disturbance caused by persons leaving the premises;
- in relation to urination in public places the means to prevent nuisances should include the adequacy of lavatories, financial contributions towards the provision and/or maintenance of public urinals and supervision in the vicinity of the premises;
- congregations of persons, whether consuming alcohol or not, either waiting to enter, leaving or spilling/standing outside the premises;
- litter and accumulations of rubbish;
- the removal from premises of drinking vessels and bottles;
- vermin and pests;
- light pollution;
- use of fireworks or other explosives / special effects;
- noxious smells;
- arrangements to ensure that public lavatories within premises are available for use throughout the entire period that the public are on those premises;
- noise, odour and litter from persons smoking outside the premises;

7.5 Protection of Children from Harm - the means by which harm to children will be or is prevented by the effective arrangement and operation of the licensed activities including, and not limited to:

- the prevention of unlawful supply, consumption and use of alcohol and drugs and other products which it is illegal to supply to children, including proof of age arrangements;
- premises restrictions on the access by children to the whole or any part of premises, including times when children may not be present;
- the protection from inappropriate exposure to strong language, expletives or entertainment of an adult or sexual nature;
- the protection from any gambling;
- arrangements to prevent, drug taking or dealing;
- adequacy of controls on the times during which children may be present on the premises;
- the nature of the licensed premises and facilities provided e.g. sporting, cultural and recreational, where these may provide a tangible social benefit, particularly for children and may contribute to crime and disorder reduction and the protection of children from harm.

## **8. Principles and sections for consideration**

8.1 This section outlines the specific policies that the Authority has set out as its expectations on applicants. It is expected that applicants will take these policies into consideration when developing their operating schedules and operating their premises.

## **9. General principles**

9.1 Two general principles have been identified which are noted throughout the Statement of Licensing Policy and are outlined here clearly as general principles that will be taken into consideration for all licensing applications.

All licensing applications are expected to show:

- a). That applicants have a clear understanding of the locality in which they are operating or intending to operate and that this has been taken into account in the application, any voluntary conditions proposed and for these to be set out clearly within the operating schedule.
- b). That applicants have taken into account the Council’s broader aspirations, and the Mayor’s vision for London, particularly in relation to an offer that provides for the diverse Enfield’s population.

**10 Sections: Process and administrative**

**Section A: Licence applications and review**

**The process for applications set out in this section will be followed in all cases of applications for new licences or variations to existing licences.**

- 10.1 Applications will be progressed in accordance with procedures laid down by the Licensing Act 2003 and any accompanying applicable guidance to the Act as produced by the Home Office. Prospective applicants should refer to the separate relevant guidance documents for further details. Where reference is made to applications in this policy this should be taken as referring to applications for new premises licences, club premises certificates, variations to these and reviews of licences/certificates.
- 10.2 Once an application is made and received electronically by the Licensing Authority it will be provided to all Responsible Authorities (see paragraph 10.7).
- 10.3 Details of applications are available via the Enfield Council website at [www.enfield.gov.uk](http://www.enfield.gov.uk).
- 10.4 Applications for all licences and authorisations available under the 2003 Act must be made on the relevant form prescribed under secondary regulations. Applications will not be progressed until the form has been completed in full and received, together with the relevant fee(s) and all other required information, by the Licensing Authority and the relevant responsible authorities.
- 10.5 Where electronic applications are made, the application will be taken to be 'given' when the applicant has submitted a complete application form and submitted the fee.
- 10.6 The Responsible Authorities are:

Responsible Authority	Contact details
Licensing Authority	Enfield Council



	email: <a href="mailto:licensing@enfield.gov.uk">licensing@enfield.gov.uk</a>
Environmental Health	<a href="mailto:Environmental.health@enfield.gov.uk">Environmental.health@enfield.gov.uk</a>
Child Protection	<a href="mailto:safeguardingenfield@enfield.gov.uk">safeguardingenfield@enfield.gov.uk</a>
Planning Authority	<a href="mailto:Planning.decisions@enfield.gov.uk">Planning.decisions@enfield.gov.uk</a>
Health and Safety	<a href="mailto:Environmental.health@enfield.gov.uk">Environmental.health@enfield.gov.uk</a>
Trading Standards	<a href="mailto:Environmental.health@enfield.gov.uk">Environmental.health@enfield.gov.uk</a>
Metropolitan Police	TBI
London Fire Brigade	TBI
Director of Public Health	TBI
Port of London Authority (for vessels only)	London River House, Royal Pier Road, Gravesend, Kent, DA12 2BG
<b>Home Office (Immigration Enforcement)</b>	Alcohol Licensing Team Lunar House 40 Wellesley Road Croydon CR9 2BY  email: <a href="mailto:alcohol@homeoffice.gsi.gov.uk">alcohol@homeoffice.gsi.gov.uk</a>

10.7 The steps for consideration of a licensing application, a licensing variation and a club premises certificate are:

- a) If no representations are made to an application, the Authority must grant it in full.
- b) When an application is made, and relevant representations are made to the Authority it must hold a hearing of the Licensing Sub-Committee (unless those who have made representations agree in advance that this is unnecessary).
- c) The Licensing Sub-Committee will then consider the evidence provided by applicants and by those making representations, the legislation and accompanying Guidance, this Statement of Licensing Policy and any other relevant data.
- d) The Licensing Sub-Committee will determine the application and will take any steps it considers appropriate for the promotion of the licensing objectives.
- e) Conditions on the licence, additional to those voluntarily offered by the applicant, may be considered. Appropriate conditions will focus on matters which are within the control of individual licensees and which also relate to the premises or places being used for licensable activities and the impact of those activities in the

vicinity. If situations arise where the licensing objectives are compromised but cannot be dealt with by the use of appropriate conditions the Licensing Authority will consider whether it is appropriate for a licence to be issued or for the premises to continue in operation.

10.8 Conditions on a licence:

- must be appropriate for the promotion of the licensing objectives;
- must be precise and enforceable;
- must be unambiguous and clear in what they intend to achieve;
- should not duplicate other statutory requirements or other duties or responsibilities placed on the employer by other legislation;
- must be specific to the individual type, location and characteristics of the premises and events concerned;
- should not be standardised and may be unlawful when it cannot be demonstrated that they are appropriate for the promotion of the licensing objectives in an individual case;
- should not replicate offences set out in the 2003 Act or other legislation;
- should be proportionate, justifiable and be capable of being met;
- cannot seek to manage the behaviour of customers once they are beyond the direct management of the licence holder and their staff, but may impact on the behaviour of customers in the immediate vicinity of the premises or as they enter or leave; and
- should be written in a way that is specific, clear and measurable.

10.9 Individuals applying for a personal licence must be entitled to work in the UK. The Immigration Act 2016 amended the Licensing Act 2003 with effect from 6 April 2017 so that an application made on or after that date by someone who is not entitled to work in the UK must be rejected. Licences must not be issued to people who are illegally present in the UK, who are not permitted to work, or who are permitted to work but are subject to a condition that prohibits them from doing work relating to the carrying on of a licensable activity. In order to discharge this duty, the Authority must be satisfied that an applicant has the right to work in the UK and requires applicants to submit one of the documents listed at Appendix 11 of this policy, to demonstrate that the applicant has permission to be in the UK and that they are permitted to undertake work in a licensable activity. This also applies to individuals who apply for premises licences. The purpose of this is to prevent illegal working in the UK.

10.10 A person is also disqualified from holding a licence if they are subject to a condition on their permission to be in the UK preventing them from holding a licence, for example if they are subject to an immigration restriction that does not permit them to work.

**Where a valid and reasonable request for a review of a licence is made to the Authority, the Authority will initiate a process to consider and undertake a review.**

- 10.11 Responsible Authorities, residents or businesses or a representative of these may ask the Authority to review a premises licence because of a concern about the premises in connection with any of the four licensing objectives.
- 10.12 Any request for a review of a premises licence is required to be accompanied by evidence to accompany the allegations.
- 10.13 When a request for a review is initiated by other persons, the Authority is required to first consider whether the representation made is relevant to the licensing objectives and is not vexatious or frivolous. Where a Responsible Authority requests a review, it must first consider if the request is vexatious or frivolous..
- 10.14 Representations must relate to particular premises for which a premises licence is already held and must be relevant to the promotion of the licensing objectives. The review process is not an opportunity to revisit earlier representations made when the original application for a premises licence was determined, unless these relate to different circumstances.
- 10.15 Where the Authority receives a request for a review in accordance with the closure procedures described in Part 8 of the Act, the Authority will arrange a hearing in accordance with the regulations set out by the Secretary of State.
- 10.16 The licensing committee, in determining a review, may exercise the range of powers given to them to promote the licensing objectives.
- 10.17 The options open to the Authority include the following steps:
- modifying the conditions of the premises licence (which includes adding a new condition(s) and/or any alteration or omission of an existing condition(s) temporarily or permanently);
  - excluding a licensable activity from the scope of the licence;
  - removing the designated supervisor;
  - suspending the licence for a period not exceeding three months;
  - revoking the licence; or,
  - to take no action.
- 10.18 The Authority will seek to establish the cause or causes of the concern and remedial action will be targeted at such causes. Any action will be proportionate to the problems involved.
- 10.19 Where a Magistrates Court makes a Closure Order under part 8 of the Licensing Act 2003 (on grounds of disorder) the Authority must carry out a review of the licence.
- 10.20 Where a Magistrates Court makes a Closure Order under part 4 of the Anti-Social Behaviour, Policing and Crime Act 2014 and the Authority receives notice of this under section 80(9) or section 84(7) of this act the Authority must review the premises licence (as set out under the provisions of section 167 of the Licensing Act 2003). This also applies where a court has made an illegal working compliance order under Schedule 6 to the Immigration Act 2016 and the Authority has received a notice under that Schedule.
- 10.21 **Offences** under the Licensing Act 2003 include the serving of alcohol to unaccompanied persons under 18. The consumption of alcohol by minors impacts on the health, educational attainment, employment prospects and propensity for

crime of young people. The sale of alcohol to persons who are intoxicated is also an offence under the Licensing Act 2003. The Authority will treat representations that these offences have occurred seriously when they arise in connection with the granting or review of a premises licence. It will also have regard to other criminal activities which may take place in some types of licensed premises such as:

- the sale or distribution of drugs;
- the sale or distribution of stolen or counterfeit goods or weapons sale of smuggled tobacco and/or alcohol;
- prostitution, pimping or procuring;
- use as a base for criminal activity, particularly gangs, organisation of racist activity, unlawful gaming and gambling; and,
- employment of those who do not have the right to work in the UK.

10.22 Where reviews arise and the Authority determines that the crime prevention objective is being undermined through the premises being used in connection with crime or the committing of a criminal offence(s), it is expected that the revocation of the licence - even in the first instance - will be seriously considered (s182 Guidance, paragraph 11.26). Revocation also remains an option if other licensing objectives are being undermined.

10.23 Comments about applications and reviews are made by representations. These can be from a responsible authority (such as the Police) or other persons (such as a local resident or residents' group). A representation can be an objection to an application or part of an application or can be in support of an application. Guidance on making representations and applying for a review is available on the Council's website.

10.24 The review process is integral to the operation of the Licensing Act 2003.

10.25 The Government's intention is for a light touch regulatory regime with regard to the granting of new licences and variations. Only when there have been representations will the licensing discretion be engaged. If problems arise in connection with a premises licence, it is for the responsible authorities and the other persons to apply for a review of the licence. Without such representations, the Authority cannot review a licence. Proceedings under the Licensing Act 2003 for reviewing a premises licence are provided as a key protection for the community where problems associated with crime and disorder, public safety, public nuisance or the protection of children from harm are occurring.

### ***'Shadow' Licences***

10.26 The Authority reserves the right to review additional or 'shadow' licences that are in place for a premises where the primary licence is being reviewed.

## **Section B: Licensing Fees**

**Licensing fees are set and are due for payment on the anniversary of the licence. If the Licensing fee is not paid on time the licence will be suspended until such fees are paid.**

- 10.27 Premises licence application fees are dependent upon the non-domestic rateable value of the premises. This value, which is also used to calculate business rates, can be found through the Valuation Office Agency (VOA) search engine at <https://www.gov.uk/find-business-rates>. The Authority expects licence holders to pay the required licence fee when it is due.
- 10.28 If Licence fees are not paid at the time they are due, suspension of the licence for non-payment of fees will be in force two days after the Authority notifies the Licence holder. The Authority can notify the Licence holder the day after the payment is due if payment is not received by the due date. Licence fees are due on the anniversary of the licence being granted.
- 10.29 The suspension will cease to be in place when the payment is received.
- 10.30 It is the Licence holder's responsibility to pay their fees, the Authority will not issue a reminder of fees when they are due. This is a matter for Licence holders, and the Authority expects Licence holders to take responsibility for ensuring that their fees are paid when they are due.
- 10.31 If the fee is disputed prior to the date it is due for payment the licence will not be suspended pending clarification and resolution. Once the actual fee has been clarified this will be payable and continued non-payment will result in suspension. Where an administrative error in relation to the recorded receipt of the annual fee has been made by the local authority and the Licence holder has provided proof of payment the licence will not be suspended.
- 10.32 Carrying on licensable activity while a licence has been suspended is a criminal offence and may result in enforcement action including prosecution.
- 10.33 Licensing fees can be found on the Enfield Council website here:  
[https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0020/54902/Licensing-Act-fees-2024-25-Business-and-licensing.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0020/54902/Licensing-Act-fees-2024-25-Business-and-licensing.pdf)

### Section C: Scheme of Delegation

- 10.34 The following table sets out the agreed delegation of decisions and functions of the Licensing Sub-Committee and Officers.

Matter to be dealt with	Licensing Sub-Committee	Officers
Application for personal licence	Where a Police objection has been received	Where an objection was not received
Application for personal licence with unspent convictions	All cases	
Application for provisional statement	Where representations have been received and not withdrawn	Where representations were not received or have all been

		withdrawn
Application for premises licence / club premises certificate	Where representations have been received and not withdrawn	Where representations were not received or have all been withdrawn
Application to vary premises licence / club premises certificate	Where representations have been received and not withdrawn	Where representations were not received or have all been withdrawn
Application to vary designated premises supervisor	Where a Police objection has been received	Where an objection was not received
Request to be removed as designated premises supervisor		All cases
Application for transfer of premises licence	Where a Police objection has been received	Where an objection was not received
Application for interim authority notice	Where a Police objection has been received	Where an objection was not received
Application to review premises licence/ club premises certificate	All cases	
Decision whether a representation is irrelevant, frivolous or vexatious		All cases
Making of representation when authority is consulted by neighbouring licensing authority	All cases	
Determination of an application to vary premises licence at community premises to include alternative licence condition	If Police objection	All other cases
Consideration of a police objection to a temporary event notice	All cases	
Decision to consult other responsible authorities on a minor variation application		All cases
Determination of a minor variation application		All cases
Revocation of a club licence		All cases
Revocation of a personal licence	All cases	
Revocation for a club premises certificate where a club is deemed by the Authority to no longer satisfy the conditions for being a qualifying club	All cases	

- 10.35 If the fee is disputed prior to the date it is due for payment the licence will not be suspended pending clarification and resolution. Once the actual fee has been clarified this will be payable and continued non-payment will result in suspension. Where an administrative error in relation to the recorded receipt of the annual fee has been made by the local authority and the Licence holder has provided proof of payment the licence will not be suspended.
- 10.36 Carrying on licensable activity while a licence has been suspended is a criminal offence and may result in enforcement action including prosecution.

## Section D: Authority and DPS

**Every supply of alcohol under a premises licence must be made or authorised by someone holding a personal licence. Every premises with a licence must have one person holding a personal licence specified as the Designated Premises Supervisor (DPS).**

- 10.37 The Authority recommends that all persons employed on licensed premises who are engaged in the sale and supply of alcohol be encouraged to attend recognised training programmes to raise awareness of their responsibility and particularly of the offences contained within the Act. Similarly, persons employed at on-licensed premises should be encouraged to attend training programmes which will raise their awareness of the issues relating to drugs and violence in licensed premises. Suitable training (including refresher training) should be extended to all staff involved in managing or supervising the premises. All training undertaken should be recorded.
- 10.38 It is recommended that persons employed on premises providing entertainment for children and youths attend training programmes in basic child protection and safety and safeguarding, and if appropriate have the necessary Disclosure and Barring Service checks.
- 10.39 Every premise licensed for the sale of alcohol must have one personal licence holder specified as Designated Premises Supervisor (DPS). This will normally be the person with day-to-day responsibility for running the premises.
- 10.41 Every supply of alcohol under a premises licence must be made or authorised by a person who holds a personal licence. The Licensing Act does not require the presence of a personal licence holder at all material times but if any sales are made when a personal licence holder is not present, then they must have been authorised by somebody who holds a personal licence.
- 10.42 The Authority recognises that there is no requirement for the DPS to be at the premises at all times that it carries out licensable activities, and it will not seek to achieve this by way of conditions. However, the DPS must be able to ensure that all four licensing objectives are properly promoted and that each premises complies with licensing law and licence conditions. The Authority expects that a DPS will be able to demonstrate knowledge of both the local geographic area and the patrons the

premises attracts. The DPS should be sufficiently fluent in English to be able to properly communicate with patrons.

- 10.43 The Authority considers it reasonable that those who hold licences and persons involved in the sale of alcohol are able to understand the terms of the licence and their legal obligations. It is also expected that those making sales of alcohol can understand and converse in the English language and be able to read and write in English so as to be able to complete documents such as refusals books and read training guides. Where relevant representations are made, and a lack of understanding of basic written and/or spoken English is a factor in those representations, consideration may, if appropriate, be given to attaching conditions to premises licences and club premises certificates that require the licence holder and staff connected with the business, attend a 'Basic Skills' course. This would be at cost to the applicant.
- 10.44 The Authority expects that when the DPS is not present on the premises written authorisation will have been given to other members of staff, and that one of these members of staff will be on the premises. Such authorisation should be in writing and be displayed with the premises licence.
- 10.45. It is considered good management practice to ensure that a personal licence holder/DPS is available at all hours that the premises is open to the public. Depending on the nature of the premises, it may be sufficient for the personal licence holder to be contactable by telephone. It is regarded as good management practice that a personal licence holder/DPS be physically on the premises from 23:00 onwards.

## Section E: Temporary Events

The Authority expects that all applications for Temporary Events Notices (TENs) are submitted well in advance of the event, with 10 days being the statutory minimum for a standard TEN, and that sufficient accompanying information is provided at the time of application to allow due consideration, including evidence of permission to use space if it is a public or council land/venue and efforts have been undertaken to engage local residents.

It is expected that any existing conditions on a licence will be maintained for the purposes of a TEN. It is also recommended that TENs are submitted well in advance prior to the event to allow relevant responsible authorities to have appropriate time to consider the TENs.

- 10.46 A temporary event notice (TEN) is required in order to carry out any 'licensable activity' on unlicensed premises.<sup>4</sup>
- 10.47 Licensable activity includes:
- selling alcohol
  - serving alcohol to members of a private club
  - providing entertainment, such as music, dancing or indoor sporting events
  - serving hot food or drink between 11pm and 5am
- The process of applying is formally known as 'serving' a Temporary Event Notice.

<sup>4</sup> <https://www.gov.uk/temporary-events-notice>



A TEN is also required if a particular licensable activity is not included in the terms of the existing licence.

- 10.48 To be eligible for a TEN an event must:
- have fewer than 500 people at all times – including staff running the event
  - last no more than 168 hours (7 days)
- 10.49 A TEN is required for each event held on the same premises. The Licensing Authority will intervene if the statutory limits on the number of TENs per year are exceeded.
- 10.50 A non-personal licence holder can apply for up to 5 TENs may be granted a year. A personal licence holder may be granted up to 50 TENs a year.
- 10.51 A single premises may have up to 15 TENs applied for in one year, as long as the total length of the events is not more than 21 days in one year.
- 10.52 Separate but consecutive events must have at least a 24-hour gap between them.
- 10.53 The legislation states that applications must be made at least 10 clear working days before the event. Clear working days do not include the day the council receives the application or the day of the event.
- 10.54 A copy of the TEN must be sent to the police licensing team at least 10 working days before the event. If the application is made online, contains all the necessary details and is accompanied by the correct payment, the council will contact the police for you.
- 10.55 It is recommended however that TENs are submitted 30 days prior to the event to allow for the relevant responsible authorities to have sufficient time to consider the notice in full.
- 10.56 When a TEN is submitted the Authority expects that the following information will be provided:
- Evidence of permission to use outside space for an event, specifically where the outside space is Council-owned or public land and, where permission has been granted, evidence that all applicable fees have been paid in full;
  - A clear description of the area in which it is proposed to carry out the licensable activities;
  - A risk assessment and capacity determination;
  - Any other information that is relevant or pertinent to the TENs.
- 10.57 Applicants are requested to note that other documents to support the TEN such as a Noise Management and Traffic Management Plans as appropriate may be required by the Licensing Authority and/or Police.
- 10.58 Applications must be accompanied by the relevant fee at the time of application to be considered valid. (details of current fees are available from the Council's website at - <https://www.enfield.gov.uk/services/business-and-licensing/temporary-event-notices>)
- 10.59 If full information is not provided in support of a TEN it is more likely that an objection will be forthcoming.

- 10.60 It is recommended that applicants for TENs that relate to large events, particularly large outdoor events, consult local residents' groups before submitting their TENs application and show evidence of this in their application.
- 10.61 A TEN may only be applied for by an individual, not an organisation. Individuals must be aged at least 18 to apply for a TEN.
- 10.62 A 'Late' TEN is where a late application is made outside of the statutory 10 clear working days before the event but between 5 to 9 clear working days before the event.
- 10.63 Where a personal licence is not already held, up to 2 late TENs may be served in one year. Where a personal licence is held, the limit is 10. Late TENs count towards the total number of permitted TENs.
- 10.64 Only the Police or Environmental Health can object to a TEN. They must do this within 3 working days of receiving it. They can only object if they think an event could:
- lead to crime and disorder
  - cause a public nuisance
  - be a threat to public safety
  - put children at risk of harm
  - If there is an objection, the Council's Licensing Committee will hold a meeting (called a 'hearing') no later than 24 hours before the event (unless all parties agree that a hearing isn't needed).
- 10.65 At the hearing, the committee will either approve, add conditions or reject the TEN.
- 10.66 If the applicant disagrees with the licensing committee's decision, there is the option appeal to the local magistrates' court. This must be done within 21 days, and at least 5 working days before the date of the proposed event.
- 10.67 It should be noted that if the police or Environmental Health object to a late TEN, the notice will not be valid and the event cannot be held.
- 10.68 If an objection to a late TEN is received, a counter notice will be served, and the event will not be allowed to go ahead, and this decision will be final. A late TEN doesn't allow for mediation or a hearing, therefore if an objection is received a counter notice is automatically issued.
- 10.69 Carrying out an activity that requires a licence (or allowing a premises to be used for one) in the absence of a valid TEN can lead to a fine or imprisonment of up to six months (or both).
- 10.70 Organisers of temporary events should be aware that although a licence or authorisation may not be needed under the Act, other legislation might apply This can include:
- Health and Safety at Work etc. Act 1974;
  - Regulatory Reform (Fire Safety) Order 2005;
  - Environmental Protection Act 1990.

- 10.71 Organisers of temporary events should also be aware that it is highly likely that the Council's enforcement officers will visit events held under the terms of a Temporary Event Notice to ensure compliance with legal requirements. While mindful of the Council's Enforcement Policy, the Council will normally prosecute where serious offences are detected.

## Section F: Conditions

- 10.72 When relevant representations are made by a Responsible Authority or Other Person, the Committee may impose conditions on licences. Any such conditions, which must be necessary for the promotion of the Licensing Objectives, will be specific to the individual premises and events. Conditions may be drawn from the model pool of conditions in the Guidance.
- 10.73 Special conditions may be imposed for certain types of venues to prevent the sale and consumption of drugs and to create a safer environment for those who may have taken them. These conditions will take into account the "Safer Nightlife" initiative and model conditions from the Guidance. Where these conditions are to be imposed advice maybe sought from appropriate bodies such as the Police, who it is envisaged will make representations on such applications.
- 10.74 The Council will have regard to the impact of licensable activities at specific premises on persons living and working in the vicinity of those premises, which are disproportionate and unreasonable. These issues will mainly concern noise, light pollution, noxious smells, litter and vermin and pest infestations. Nuisance may include, in appropriate circumstances, the detrimental impact upon the living and working amenity and environment of 'other persons'. Special conditions and other limitations may be considered necessary where customers may be inclined towards carelessness and anti-social behaviour as a result of consuming alcohol.
- 10.75 The Council will give consideration to setting capacity limits for licensed premises or clubs where it may be necessary for public safety or otherwise to prevent over-crowding which may lead to disorder and nuisance. Where applicable, further consideration will also be given to whether door supervisors would also be needed to ensure that the numbers are appropriately controlled.
- 10.76 The pool of model conditions is found in Annex 9.

## Section G: Enforcement

- 10.77 The Council will follow the Regulators Code (<https://www.gov.uk/government/publications/regulators-code>) and the Hampton principles and shall endeavour to be:
- Proportionate - regulators should only intervene when necessary, remedies should be appropriate to the risk posed, and costs identified and minimised;
  - Accountable - regulators must be able to justify decisions, and be subject to public scrutiny;
  - Consistent - rules and standards must be joined up and implemented fairly;

- Transparent - regulators should be open, and keep regulations simple and user friendly;
- Targeted - regulation should be focused on the problem and minimise side effects.

10.78 The Council will endeavour to avoid duplication with other regulatory regimes so far as possible.

10.79 The Council will adopt a risk-based inspection programme. The Council's risk model for premises licences will be based upon the Licensing Objectives. The main enforcement and compliance role for the Council under the Act is to ensure compliance with the premises licences and other permissions which it authorises.

## **11. Sections: Expectations and considerations**

### **Section H: Licensing Hours**

11.1 The Council will deal with licensing hours on the merits of each individual application, again, only if relevant representations are made and there is a hearing to consider them. Applicants are expected to provide details of the measures they intend to take in order to promote the Licensing Objectives.

11.2 The Council recognises that variable licensing hours for the sale of alcohol may be desirable to ensure that concentrations of customers leaving premises simultaneously are avoided. However, where this may lead to longer opening hours the Council also recognises the potential for additional crime and disorder and/or public nuisance that may arise.

11.3 However, there is no general assumption in favour of lengthening licensing hours and the four Licensing Objectives should be paramount considerations at all times. Where there are representations against an application and the Sub-Committee believes that extending the licensing hours would undermine the Licensing Objectives, they may reject the application or grant it with appropriate conditions and/or different hours from those requested.

11.4 Stricter conditions with regard to licensing hours may be required for licensed premises situated in or immediately adjacent to residential areas to ensure that disturbance to local residents is avoided. This will particularly apply in circumstances where, having regard to the location, size and nature of the licensed premises, it is likely that disturbance will be caused to residents in the vicinity of the premises by concentrations of people leaving, particularly during normal night-time sleeping periods. It is accepted that applicants' operating schedules may adequately provide for such circumstances and the Council will not seek to impose stricter conditions unless relevant representations are received, and a hearing takes place.

11.5 The Council takes the view that persons under 18 may be at risk by late night access to premises primarily used for the sale and consumption of alcohol..

### **Section I: Children**

- 11.6 The Act imposes certain controls by way of criminal penalty relating to the access to certain premises by unaccompanied children. In addition, Policy may create further restrictions for certain premises relating to access by children.
- 11.7 The Council recognises the wide variety of premises for which licences may be granted. It also recognises that there are many circumstances where it is appropriate for children to be present on premises and seeks to encourage their access to constructive leisure pursuits that support the social fabric of the Borough. It also recognises that there are circumstances where it is appropriate to limit or prevent access by children for the purposes of the Licensing Objectives.
- 11.8 The Council will not therefore impose conditions that restrict or prevent access by children unless this is necessary to promote the Licensing Objectives. It will however seek to ensure that children are not permitted to remain at or enter certain premises after a specified cut-off time or times.
- 11.9 In determining a specified cut-off time, the committee will take into account:
- the concerns of Responsible Authorities and Other Parties who have made representations;
  - the steps set out in an operating schedule that the licensee will take to meet the Licensing Objectives having regard to the nature of the premises or events for which the licence is required.

### ***Children (Off-licence)***

- 11.10 For premises supplying alcohol for consumption off premises, the Council normally requires applicants to have arrangements to ensure that children under 14 years, not accompanied by an adult, are not permitted to remain at or enter the premises after 21:00.
- NB. The age-limit of 14 years is intended as an upper limit and does not imply that this limit will be permitted for all relevant applications.
- 11.11 There will be a strong presumption against access by persons under 18 to premises where any of the following apply:
- where adult entertainment is provided;
  - where there have been convictions of the current management for serving alcohol to minors;
  - where requirements for proof of age cards or other age identification to combat the purchase of alcohol by minors is not the norm;
  - where there is a known association with drug taking or dealing;
  - where there is a strong element of gambling on the premises;
  - where the supply of alcohol for consumption on the premises is the exclusive or primary purposes of the services provided at the premises
- 11.12 In order to protect children, the Licensing Committee or Sub-Committee's options would include, among other things, requiring conditions relating to:
- requirements for the production of proof of age cards or other age identification before sales are made;
  - training of staff who are authorised to sell alcohol;
  - limitations on the hours when children may be present;
  - age limitations below 18;

- limitations or exclusions when certain activities are taking place;
- access limited to parts of the premises;
- requirements for accompanying adults;
- full exclusion of people under 18 from the premises when any licensable activities are taking place.

11.13 No conditions will be imposed to the effect that children must be admitted to licensed premises.

11.14 Conditions may be imposed on licences for premises where children will be present during regulated entertainment to the effect that adult staff must be present to control the access and egress of children and to ensure their safety.

11.15 Children and cinemas:

- The Council will require licensees to include in their operating schedules arrangements for restricting the viewing of films by children below the age of any restriction for that film as classified according to the recommendations of the British Board of Film Classification or the Council, as the case may be;
- In respect of all premises licences and club premises certificates that authorise the exhibition of films to children, a mandatory condition will be required for the exhibition of any film to be restricted in accordance with the recommendations given to films by a body designated under section 4 of the Video Recordings Act 1984 or by the Council;
- The Council will expect the premises to provide adequate numbers of attendants in accordance with model conditions from the Guidance;
- It is not the Council's intention to re-classify films that have been classified by a body designated under section 4 of the Video Recordings Act 1984. However, the Council reserves the right to do so in exceptional circumstances.

## **Section J: Cumulative Impact Zones and Cumulative Impact Assessment**

11.16 A Cumulative Impact Zone (CIZ) is an area that has been identified by a Licensing Authority (the Council) after a Cumulative Impact Assessment has been undertaken, as a zone that is at risk of a cumulative impact of harms from any additional licenses (or particular types of premises or licensed activities, such as late night refreshment of a night club for example) being granted. Any applicant for a licence in a CIZ will need to demonstrate to the Licensing Authority what measures they plan to take in their premises to stop their premises from adding any additional harms to the area.

11.17 A Cumulative Impact Assessment is a process undertaken by the Licensing Authority (the Council) to determine if there is the evidence and support for an area becoming, remaining or ceasing to be a Cumulative Impact Zone. This process requires the Licensing Authority to demonstrate evidence and to consult key stakeholders to inform its decision.

11.18 Enfield Council has undertaken an assessment of the four existing Cumulative Impact Zones (CIZs):

- Upper Edmonton
- Enfield Highway
- Enfield Town
- Southgate

- 11.19 Enfield Council has also undertaken an assessment for two new CIZs:
- Bowes
  - Palmers Green
- 11.20 The assessment reviewed the evidence to support the continuation of CIZ's in the existing areas and the establishment of CIZ's in Bowes and Palmers Green. Enfield Council considers that the evidence does support the continuation and establishment of CIZs in the six areas outlined in 11.16 and 11.17 above. This evidence can be found in outlined in Annexes 2 – 7 of this policy.
- 11.21 The assessment was also put out to a public consultation, with particular engagement undertaken with key stakeholders. The consultation included the evidence outlined in Annexes 2 – 7. Key stakeholder engagement was overwhelmingly supportive of the four existing CIZs and the two new CIZs. All responses received from the public consultation were supportive of the four existing CIZs and the two new CIZs.
- 11.22 Enfield Council, as the Licensing Authority, believes that the appropriate evidence has been provided and the appropriate consultation undertaken to meet the necessary process for undertaking a Cumulative Impact Assessment as outlined in the Licensing Act 2003.

### ***Scope of the Cumulative Impact Zones***

- 11.23 Any applications for new premises licences, variations or provisional statements inside an Enfield CIZ will, where relevant representations are made, be subject to the presumption that the applicant will need demonstrate how the premises will not add to the cumulative impact in the CIZ for it to be granted.
- 11.24 New Year's Eve: Any premises or club that is licensed for both the on supply of alcohol and for regulated entertainment may remain open and provide their licensed activities from the end of licensed hours on New Year's Eve to the start of licensed hours on New Year's Day.

### ***Cumulative impact outside of Cumulative Impact Policy areas***

- 11.25 The Council recognises that the cumulative impact of licensed premises can be experienced by residents in areas where there is no current cumulative impact zone in place. In these areas cumulative impact can still be a consideration in making a representation on a licence application.

## **Section K: Age verification and test purchasing**

**The Authority expects all licensed premises to have the specific age verification measures outlined below in place and will conduct test purchasing operations to test and assure compliance with the minimum purchase age requirements. If sales to children are made action will be taken by the Authority.**

- 11.26 Age verification measures, and test purchasing to assure these are robust and well-operated by licenced premises are the core measure to ensuring the licensing objective for the protection of children is met.

11.27 To support the age-verification process the Authority strongly recommended that premises have the following measures in place to ensure age verification for sales:

- That “Challenge 25” is supported as part of the age verification scheme established. The scheme should require the production of evidence of age (comprising any PASS accredited card or passport or driving licence) from any person appearing to staff engaged in selling or supplying alcohol to be under the age of 25 and who is attempting to buy alcohol.
- That evidence of the scheme (in the form of documented procedures) is maintained and made available for inspection by authorised officers.
- That all staff involved in the sale of alcohol shall be trained in the age verification scheme and records of such training shall be retained on the premises and made available for inspection by Council Officers and Police
- That an incident log shall be maintained, and details of all age-related refusals recorded. This book shall be reviewed monthly by the DPS and any actions taken recorded in the book and signed off by the DPS. This log shall be retained on the premises and made available for inspection by authorized officers.
- That a personal licence holder shall be on the premises at all times that alcohol is supplied.
- That the DPS shall ensure that, as far as is reasonably practical, alcohol is displayed in an area which can be constantly monitored or supervised by staff, separate from goods likely to be purchased by persons under 18.

11.28 Enfield Council can carry out test purchasing for underage sales of alcohol. If sales are made to children, action will be taken. This may be a review of the licence, or a request to include additional conditions on the licence designed to assist the management to counter attempts by children to buy alcohol. Any additional conditions felt appropriate will be subject to discussion with licence holders. The Authority may also, as a responsible authority, apply for reviews of premises licences when appropriate. If deficiencies in operating schedules of current licences become apparent the Authority will initially usually ask the licence holder to remedy this by way of an application for a minor variation. If this is not done then a review may be necessary to impose conditions on the licence. This process does not preclude prosecutions for offences under the Licensing Act.

## Section L: Violence Against Women and Girls

**We expect all licensed premises to have appropriately trained staff, who are proactive and vigilant around women’s safety at night. This includes a duty to capture information and report to the police where appropriate.**

11.29 Enfield supports the Women’s Night Safety Charter (<https://www.london.gov.uk/programmes-strategies/arts-and-culture/24-hour-london/womens-night-safety-charter>) and is committed to sharing in the Mayor of London’s vision that all Londoners are able to travel, work and go out safely and confidently at night without fear of being victims of criminal offences.

11.30 Enfield recognises tackling Violence against Women and Girls (VAWG) as a priority.



- 11.31 We commit to sharing the Greater London Authority and Mayor's Office of Policing and Crime women's safety campaigns, promoting them within Enfield and across our social media channels. We encourage licensed premises across the borough to participate in and promote locally any National and/or London-wide campaigns to keep women safe at night that discourage harassment and encourage reporting.
- 11.32 We expect all licensed premises to build an atmosphere of transparency and safety for women who work at night and engage in leisure in the licensed trade. This may include challenging behaviour that enables intimidation and violence against women in the licensed trade and providing support to those that experience these behaviours in licensed premises. Training for staff to support this is recommended.
- 11.33 We also recommend licence holders put in place measures to reduce gender-based violence, intimidation and harassment for all staff and customers. This may include 'Ask for Angela', Welfare and Vulnerability Engagement resource (WAVE) and specific training for staff. Further details are available at the following links:
- Ask for Angela: <https://www.met.police.uk/AskforAngela>
  - WAVE: <https://nbcc.police.uk/crime-prevention/safeguarding/welfare-and-vulnerability-engagement-wave-lesson-plan>
- 11.34 We expect all licensed premises to have appropriately trained staff, who are proactive and vigilant around women's safety at night. This includes a duty to capture information and report to the police where appropriate.

### Section M: Violence Against Vulnerable People in the Nighttime Economy

**We expect all licensed premises to have appropriately trained staff, who are proactive and vigilant around the safety of vulnerable people in the nighttime economy. This includes a duty to capture information and report to the police where appropriate.**

- 11.35 We expect all licensed premises to build an atmosphere of transparency and safety for those who may be vulnerable working or taking leisure in the nighttime economy.
- 11.36 This should include the full diversity of people in the nighttime economy, include the full range of gender and identified gender, relationships, age, race, and any other demographic characteristic.
- 11.37 We also recommend licence holders put in place measures to reduce vulnerability-based violence, intimidation and harassment for all staff and customers. This may include WAVE and specific training for staff. Further details are available at the following links:
- WAVE: <https://nbcc.police.uk/crime-prevention/safeguarding/welfare-and-vulnerability-engagement-wave-lesson-plan>
- 11.38 We expect all licensed premises to have appropriately trained staff, who are proactive and vigilant around women's safety at night. This includes a duty to capture information and report to the police where appropriate.

## Section N: Venue safety and assessment of risk at venues and events

**Public Safety is expected to be a key consideration in large venues and higher profile events. This will include conducting a risk assessment to identify risks and mitigation approaches for venues where certain factors or circumstances (such as overcrowding or terrorism) may make the venue unsafe to those present in the premises. Mitigations may also need to consider the role of security staff in safety as well as security.**

- 11.39 Public Safety in venues is a key consideration for the Authority. Incidents occurring at larger venues or events with high attendance are of particular concern to the Authority. The Authority expects applicants of larger venues or where high attendance events may take place to give particular consideration to measures to promote Public Safety. These may include:
- Conducting a risk assessment and consulting Enfield Licensing and Police (see section below);
  - Considering the role of security staff in promoting safety as well as security; and,
  - Consideration about capacity limits and the ingress and egress of customers.
- 11.40 The Authority considers it prudent to prepare for the passage of the Terrorism (Protection of Premises) Bill ('Martyn's Law'). When and if this Bill is passed into legislation there will be additional requirements placed on a number of licensees to consider the threat from terrorism and implement appropriate and proportionate mitigation measures. If this Bill is passed into Legislation the Authority expects relevant applicants to include appropriate measures to meet these obligations in their licensing application.

### ***Risk Assessments***

- 11.41 Where an event that is promoted by the licence holder or an outside promoter, is to take place, Premises operators are advised to undertake a further risk assessment, where this identifies a potential crime and disorder and/or a public safety risk linked to those providing the entertainment or to those attending the event. Where risk assessments are required, they should be submitted before any proposed event and debrief forms submitted after the conclusion of the event. Where the capacity for a venue or event is over 5,000 the applicant will need to contact the Safety Advisory Group (contact via the Licensing Authority).

## Section O: Outside spaces

**Beer gardens, roof terraces, pavements and other outdoor areas serving licensed premises are expected to comply with appropriate conditions to the individual premises to ensure minimal disruption to residents in proximity to the premises.**

- 11.42 Outside spaces are an increasingly popular part of licensed premises, particularly in summer where there is more demand for outside drinking and eating options. There is a need for all outside spaces that are used for smoking, eating and drinking by

patrons of licensed premises to be well managed to reduce the potential for nuisance to be caused to nearby residents.

- 11.43 Where smoking, eating and drinking takes place outside, the Authority expects applicants to provide comprehensive details in their operating schedule on:
- the location of outside areas to be available for use;
  - how the outside areas will be managed to prevent:
    - a) noise;
    - b) smell; and
    - c) pavement obstructions, and,
    - d) littering.
  - the arrangements for clearing, tables and chairs; and
  - preventing nuisance from smoke fumes to residents living in close proximity to smoking areas.
- 11.44 Where outside spaces are used for eating, and where children and pregnant women may also be present in the outside space, the Authority expects applicants to provide details as to how smoking areas will be separated from the general use areas of the outside space.
- 11.45 Licensees must take into account the needs of patrons with disabilities and comply with the requirements of the Equalities Act 2010.
- 11.46 Where the use of outside spaces by the patrons of a licensed premises is unplanned and makes use of the pavement there is need for specific consideration. Members of the public can sometimes feel intimidated and crowds of drinkers spilling out onto the street may cause obstruction. Safety problems can also be caused with drinkers moving into the road. Consumption of alcoholic beverages should be contained within areas that are part of licensed premises, such as beer gardens, terraces or, where a street trading licence has been granted by the Council for tables and chairs, on the public highway, and consideration should be made for local residents with mobility difficulties.
- 11.47 Applications for a license for using tables and chairs on the highway are not within the remit of this policy. In the event that the hours under any such licence do not match those on a licence issued under the Licensing Act 2003 the earlier hours will apply.

## Section P: Street drinking

**In areas where street drinking has been identified as a problem by the Authority new applicants and those applying for variations are required to demonstrate how their premises will not contribute to street drinking in those areas.**

- 11.48 Applicants may wish to seek guidance from Licensing, Community Safety and Police partners as to specific measures that may be appropriate for their specific location. However, some general examples of good practice include:
- Reducing the strength approaches having voluntary bans on high strength low-cost alcohol.

- Visible labels identifying the premises.
- Use of different coloured or labelled bags for sales of alcohol.
- Ensuring street drinkers do not congregate outside the premises.
- Ensuring drinkers do not consume alcohol on the premises, also not having the paraphernalia to allow that (e.g. Single plastic drinking vessels or bottle openers near the till area).
- Keeping the premises locality clear of litter.

## Section Q: Health

**The Authority will consider the impact on the health and public health of Enfield residents as part of its considerations and duties relating to the sale and supply of alcohol.**

- 11.49 Health is not a licensing objective, but the Authority is aware that there is a significant negative impact on the health of our residents caused by alcohol, reflected in hospital admissions and deaths from alcohol related illnesses, and alcohol induced violence. Significant alcohol related hospital accident and emergency admissions and ambulance pick-ups are indicative of problems and may result in reviews of premises licences where these can be related to specific premises.
- 11.50 The evidence base for the impact alcohol has on the health and wellbeing of local areas is strong. For a full review of the evidence the Office of Health Improvement and Disparities evidence review is available [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/733108/alcohol\\_public\\_health\\_burden\\_evidence\\_review\\_update\\_2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/733108/alcohol_public_health_burden_evidence_review_update_2018.pdf).
- 11.51 Many Enfield residents suffer negative health and wellbeing effects from alcohol misuse and use and it is important to take into account these impacts as part of the wider balance for both residents and businesses in Enfield.
- 11.52 Since 2012 the Enfield Director of Public Health has been a responsible authority and is able to make representations on applications and initiate reviews. The Enfield Director of Public Health has access to data and evidence that is useful and informative for the development of policy, the consideration of applications and the conduct of reviews. This includes:
- evidence on the impact of alcohol on the physical and mental health of residents, particularly children;
  - data on hospital admissions for alcohol related illness and injury;
  - data from London Ambulance Service on alcohol related ambulance attendances; and,
  - data and evidence from local alcohol services, such as out-reach and treatment services.
- 11.53 When such evidence and data is presented it will be considered and where links are made to any of the four licensing objectives it will be taken into account by the Licensing Sub Committee in reaching its decision.
- 11.54 Applicants should also consider proximity to substance misuse treatment services and primary care centres. If substance misuse treatment services are in proximity it

may be valuable to consider the knowledge and experience of service users using alcohol premises in a specific area as evidence towards new licensing applications.

11.55 Applicants are also encouraged to consider the health quality of their food offer and are encouraged to consider the health impacts of the food they offer.

## Section R: Delivery Services

**The Authority expects licence applications for delivery services that include the delivery of alcohol to take into account issues relating to reducing public nuisance related to delivery vehicles, ensuring the security of premises and delivery drivers, and protecting children by applying rigorous age checks at purchase point and at point of delivery.**

11.56 Since the last Statement of Licensing Policy there have been an increasing number of applications for licences relating to delivery services. These tend to fall into three groups:

- Premium specialist product mail order-type services;
- Food delivery services (both meal and grocery) that include alcohol delivery but are primarily food lead; and
- Convenience-type alcohol delivery services that are targeted at convenience for those drinking at home.

11.57 Although these types of services are not provided for in the Licensing Act 2003 in any way differently from other licensed premises they do provide their own unique circumstances that need to be addressed. In particular the Authority has concerns with the potential for the following:

- Age verification at both purchase point and delivery point;
- The safety of delivery drivers at point of delivery;
- Safety of the premises from which orders are taken and sent out for delivery; and
- Possible public nuisance caused by delivery drivers collecting deliveries from the licensed premises.

11.58 The Authority is likely to place the following conditions on to a premises license for delivery services where it is appropriate and relevant to the individual license application:

- A standard age verification check shall be undertaken on entering the website.
- A signature at the point of delivery **must** be obtained from a person above the age of 18 with appropriate age verification identification. No delivery shall be left without a signature.
- Alcohol shall only be delivered to a residential or business address and may not be delivered to a public place.
- Every third-party courier delivery box shall be labelled with the words "Age Restricted Product".
- Any delivery driver or third-party courier will be required to have appropriate age verification training, and in particular they will be required to have

undergone training in refusal of supply where age verification is not provided, or the recipient is clearly intoxicated.

- A refusals log will be maintained for deliveries and available for inspection on request.
- Appropriate security will be in place at the premises as agreed with Police.
- Measures for minimising noise and disturbance caused by the dispatch of deliveries to be identified in the operating schedule.
- Website and all promotional material should be designed and set out in a way which is consistent with the responsible retail of alcohol.
- The Authority would expect operators to have systems in place to ensure alcohol is not delivered to problematic house parties or to people who appear drunk and, in such instances, alcohol should be refused, and that refusal recorded.

## Section S: Dispersal and entry

**Licensed premises should take all reasonable measures to ensure that dispersal of patrons from the premises, and entry of patrons into the premises promote to the licensing objectives.**

11.59 Section 182 guidance makes it clear that licensing should not be seen as the primary mechanism for the general control of nuisance and anti-social behaviour by individuals once they are away from licensed premises and therefore beyond the direct control of those with responsibility for managing and controlling licensed premises. However, licensees should take all reasonable steps to prevent the occurrence of crime and disorder and public nuisance immediately outside their premises, for example on the pavement, in a beer garden or in a smoking shelter to the extent that these matters are within their control.

11.60 Licence holders should also consider the impact that patrons or others congregating around entry points to their premises have on the licensing objectives, particularly in relation to the general public. Licence holders should take all reasonable measures to ensure that both dispersal from their premises and entry into the premises contribute to the licensing objectives.

11.61 The Authority recognises that it is difficult for licence holders to have influence over their patrons once they have left the immediate vicinity of their premises, however, disturbance caused by patrons, if linked to the operation of the premises can be a reason for the Authority to take action.

## Section T: Minimum Pricing

**The Authority will implement Minimum Pricing as set out in the Licensing Act (Mandatory Conditions) Order 2014**

- 11.62 This was introduced through the Licensing Act 2003 (Mandatory Conditions) Order 2014. The permitted price is defined as the level of alcohol duty plus VAT.
- 11.63 All premises are required on request by the Authority to demonstrate that any alcohol is being sold at a price not less than the permitted price: i.e. the level of alcohol duty plus VAT.
- 11.64 Premises are expected not to offer or publicise irresponsible promotions which encourage irresponsible drinking. This includes time-limited 'all you can drink' offers, such as 'bottomless brunches'. The Authority is of the view that these fall under the definition of irresponsible promotions encouraging irresponsible drinking. These offers also increase the risk of alcohol being sold under the permitted price as outlined in the Licensing Act 2003 (Mandatory Conditions) Order 2014.
- 11.65 Where any relevant representations which demonstrate a clear causal link between sales promotions or price discounting and levels of crime and disorder on or near the premises, it will be appropriate for the Licensing Authority to consider the imposition of a new condition prohibiting irresponsible sales promotions or the discounting of prices of alcoholic beverages at those premises. Each case will be considered on its own merits.
- 11.66 Any future legislation or legislative guidance on minimum unit pricing per unit of alcohol sold will apply.

## 12. Contact details

12.1 Further information and advice on this Licensing Policy Statement, the requirements of the Licensing Act 2003 and related matters is available from the Council as follows:

- Email: [licensing@enfield.gov.uk](mailto:licensing@enfield.gov.uk) or via the Internet: [www.enfield.gov.uk](http://www.enfield.gov.uk)



## ANNEX 1: DEFINITIONS

### DEFINITIONS

1.1 'Other Person' means any of the following:

Any individual, body or business entitled to make representations to licensing authorities in relation to applications for the grant, variation, minor variation or review of premises licences and club premises certificates, regardless of their geographic proximity to the premises.

1.2 'Responsible Authority' is defined in section 13(4) of the Act and means any of the following:

- 1.2.1 the relevant licensing authority and any other licensing authority in whose area part of the premises is situated,
  - 1.2.2 the chief officer of police for any police area in which the premises are situated;
  - 1.2.3 the fire authority for any area in which the premises are situated;
  - 1.2.4 the Local Health Board for any area in which the premises are situated
  - 1.2.5 the local authority in England whose public health functions within the meaning of the National Health Service Act 2006 are exercisable in respect of any area in which the premises are situated
  - 1.2.6 the enforcing authority within the meaning given by section 18 of the Health and Safety at Work etc. Act 1974 for any area in which the premises are situated;
  - 1.2.7 the local planning authority within the meaning given by the Town and Country Planning Act 1990 (c.8) for any area in which the premises are situated;
  - 1.2.8 the local authority by which statutory functions are exercisable in any area in which the premises are situated in relation to minimizing or preventing the risk of pollution of the environment or of harm to human health;
  - 1.2.9 a body which (i) represents those who, in relation to any such area, are responsible for, or interested in, matters relating to the protection of children from harm, and (ii) is recognised by the licensing authority for that area for the purposes of this section as being competent to advise it on such matters;
  - 1.2.10 any licensing authority (other than the relevant licensing authority) in whose area part of the premises is situated;
  - 1.2.11 in relation to a vessel (i) a navigation authority, (ii) the Environment Agency, (iii) Canal and River Trust, or (iv) the Secretary of State;
  - 1.2.12 a person prescribed for the purposes of this subsection.
- 1.3 'Provisional statement' means a statement issued under section 31 of the Act, which relates to premises that are about to be constructed, extended or otherwise altered.
- 1.4 The Council regards 'irresponsible price promotions' as those that encourage people to drink faster and more than they would when normal pricing arrangements apply.

## **ANNEX 2-7 CUMULATIVE IMPACT ASSESSMENT**

### **Cumulative Impact Assessment for Enfield**

#### **Introduction**

- 2.1 This paper outlines the data that has been used to assess the four existing Cumulative Impact Zones (CIZs) and for the two proposed CIZs.

#### **Executive Summary**

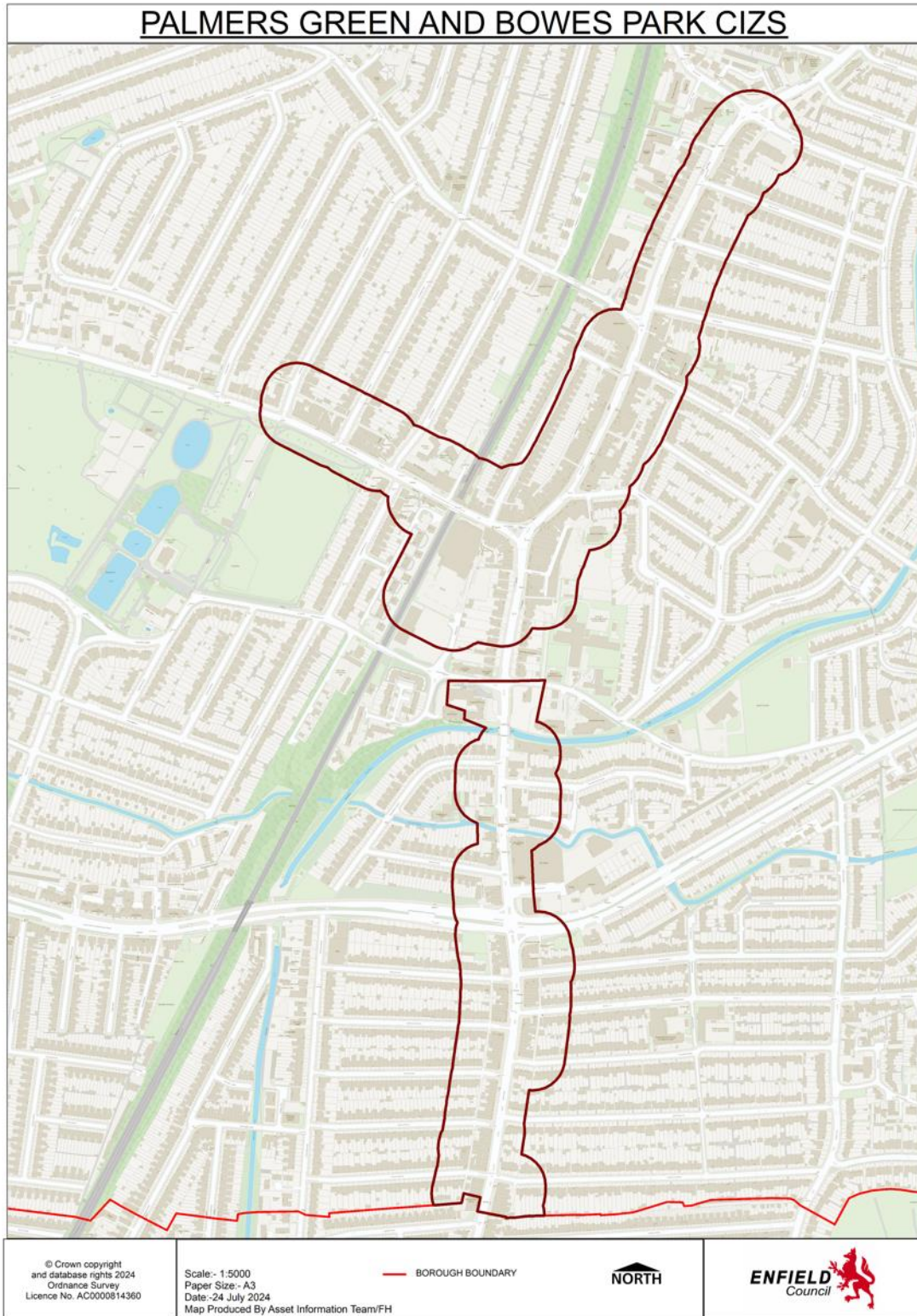
- 2.2 The London Borough of Enfield has four Cumulative Impact Zones (CIZs) as outlined in the current Statement of Licensing Policy 2020 - 2025. The licensing authority considered that the number of premises licences in these zones was such that it was likely that granting further licences would be inconsistent with the authority's duty to promote the licensing objectives.
- 2.3 The London Borough of Enfield is currently considering establishing two additional Cumulative Impact Zones, in Bowes and Palmers Green wards.

#### **Cumulative Impact Assessment**

- 2.4 A Cumulative Impact Assessment (CIA) may be published by a licensing authority to help it to limit the number or types of licence applications granted in areas where there is evidence to show that the number or density of licensed premises in the area is having a cumulative impact and leading to problems which are undermining the licensing objectives. CIAs relate to applications for new premises licences, club premises certificates, applications to vary existing premises licences, club premises certificates in a specified area.
- 2.5 Where a Cumulative Impact Zone (CIZ) is adopted it creates a presumption that licence applications for premises in the CIZ will need to demonstrate that they will not add to the cumulative impact. Only in circumstances where an applicant can demonstrate that granting an application will not add to cumulative impact may a licence be granted.

#### **Proposed additional Cumulative Impact Zones**

- 2.6 It is the view of the Licensing Authority and of a number of Responsible Authorities that the areas marked on the map below in Palmers Green and Bowes are demonstrated to have a sufficient level of cumulative impact (in terms of violence, public order and criminal damage) due to the sale, supply and consumption of alcohol that Cumulative Impact Zones should be established in these areas.



**Evidence**

2.7 There must be an evidential basis for the decision to publish a CIA. This has been provided by data sets used to assess location, volume and trajectory of

crime and anti-social behaviour in the three CIZs, and this will also be provided through a public consultation.

#### Data

- 2.8 In order to review the four existing CIZs (Upper Edmonton, Enfield Town, Enfield Highway and Southgate) we have used neighbourhood Police licensing and crime data sets for varying periods. The same data has been used to establish a case for the establishment of the two proposed new CIZs in Palmers Green and Bowes.
- 2.9 Data sets used are those most linked with cumulative impact and the licensed sector:
- All crime – to provide wider context;
  - Violence against the person offences;
  - Public Order offences; and,
  - Criminal damage offences.

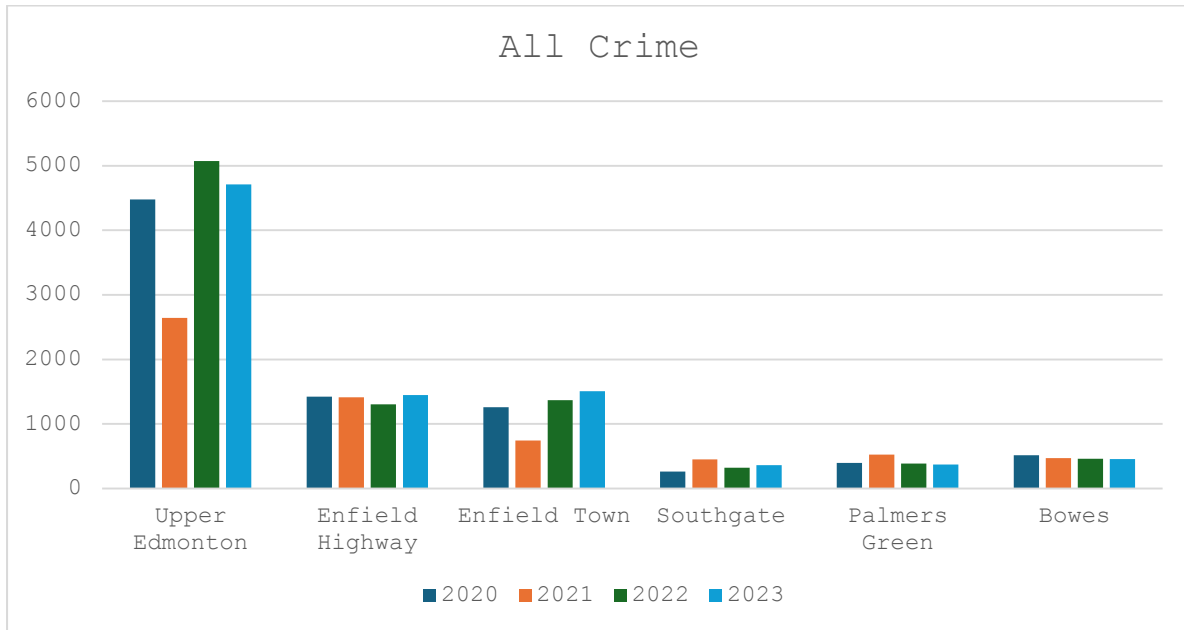
#### Data review

- 2.10 The data outlined below demonstrates the number and trajectory over time of the crime and anti-social behaviour reports in each of the existing and proposed CIZ areas. This aims to demonstrate the rationale and reasoning for these CIZs to be in place.

#### All Crime

- 2.11 As can be seen from the data below for all crime there is a relatively consistent trajectory over the four years included, with some fluctuation between years. The graph in particular outlines the three different levels of crime in the 6 areas. Upper Edmonton has the highest levels with Enfield Highway and Enfield Town at a middle level and Southgate and the two proposed areas (palmers Green and Bowes) at a lower, but still significant level.

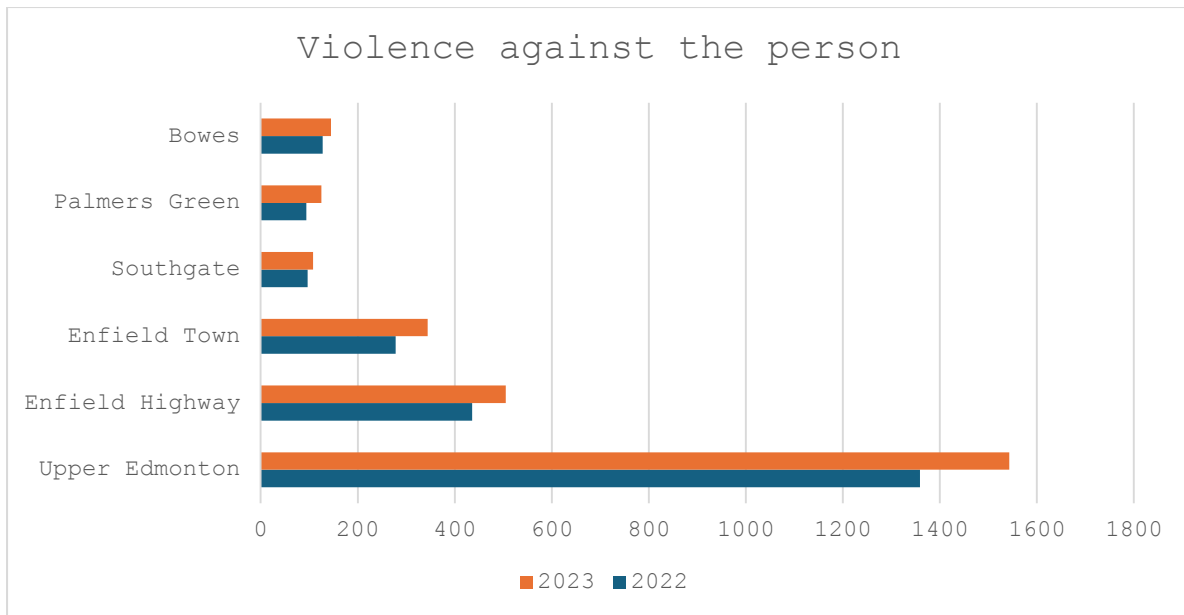
Area	2020	2021	2022	2023
<b>Current CIZ areas</b>				
Upper Edmonton	4477	2642	5071	4708
Enfield Highway	1426	1415	1307	1450
Enfield Town	1262	747	1368	1506
Southgate	265	452	323	365
<b>Proposed CIZ areas</b>				
Palmers Green	398	526	390	372
Bowes	515	473	463	456



**All violence against the person**

2.12 It is noticeable from the below table and graph that violence against the person offences saw a slight increase in all 6 areas between 2022 and 2023. This shows a continued issue with violence in these areas.

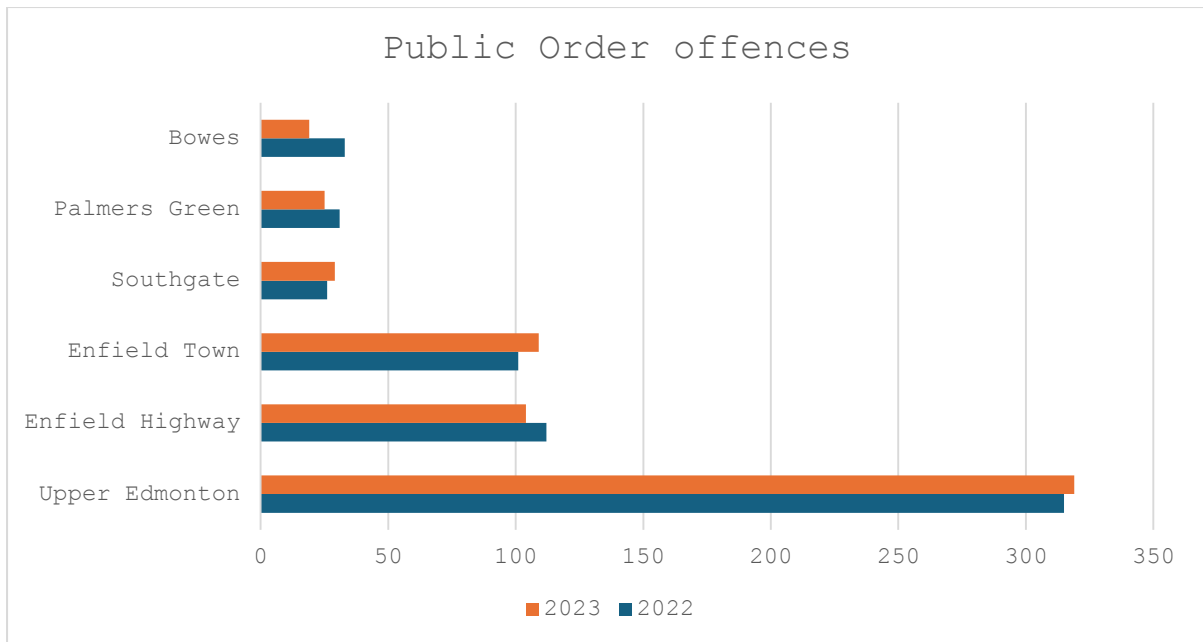
Area	2022	2023
<b>Current CIZ areas</b>		
Upper Edmonton	1359	1543
Enfield Highway	436	505
Enfield Town	278	344
Southgate	97	108
<b>Proposed CIZ areas</b>		
Palmers Green	94	125
Bowes	128	145



### All Public Order Offences

2.13 The table and graph below show that the levels of public order offences have remained consistent between 2022 and 2023.

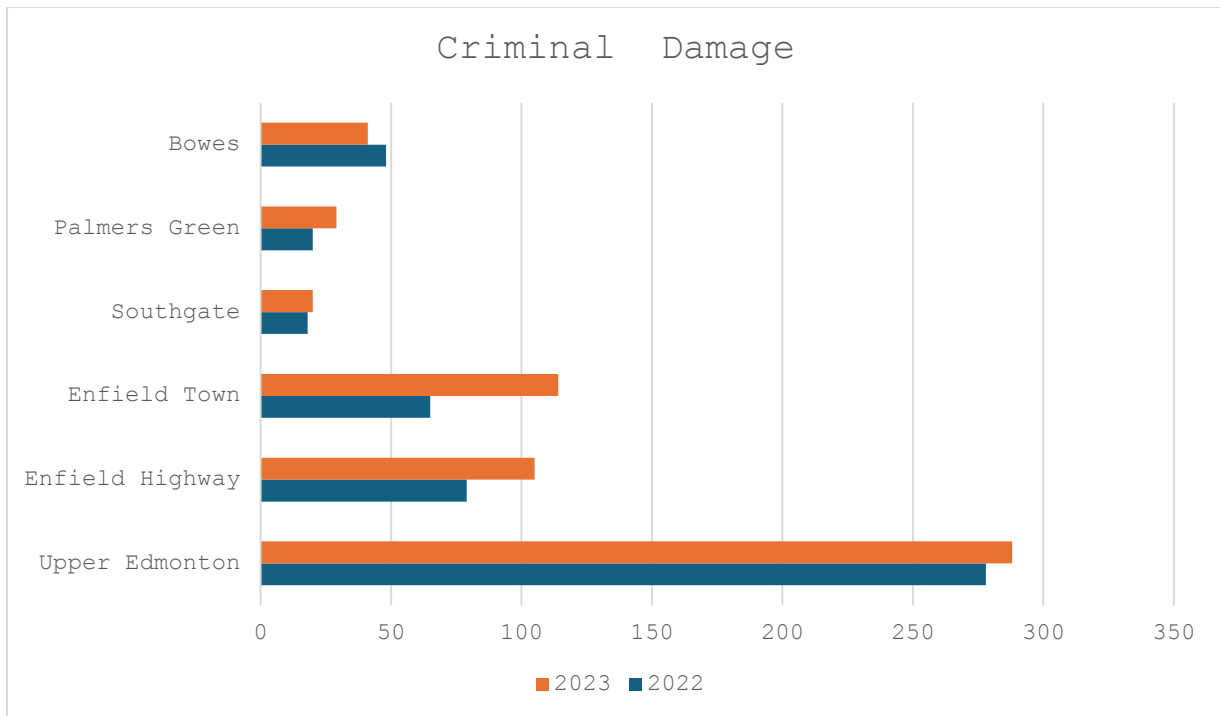
Area	2022	2023
<b>Current CIZ areas</b>		
Upper Edmonton	315	319
Enfield Highway	112	104
Enfield Town	101	109
Southgate	26	29
<b>Proposed CIZ areas</b>		
Palmers Green	31	25
Bowes	33	19



### All criminal damage

2.14 The table and graph below show that criminal damage offences have seen an increase in most of the 6 areas.

Area	2022	2023
<b>Current CIZ areas</b>		
Upper Edmonton	278	288
Enfield Highway	79	105
Enfield Town	65	114
Southgate	18	20
<b>Proposed CIZ areas</b>		
Palmers Green	20	29
Bowes	48	41



## Conclusion

### *Continuation of existing CIZs*

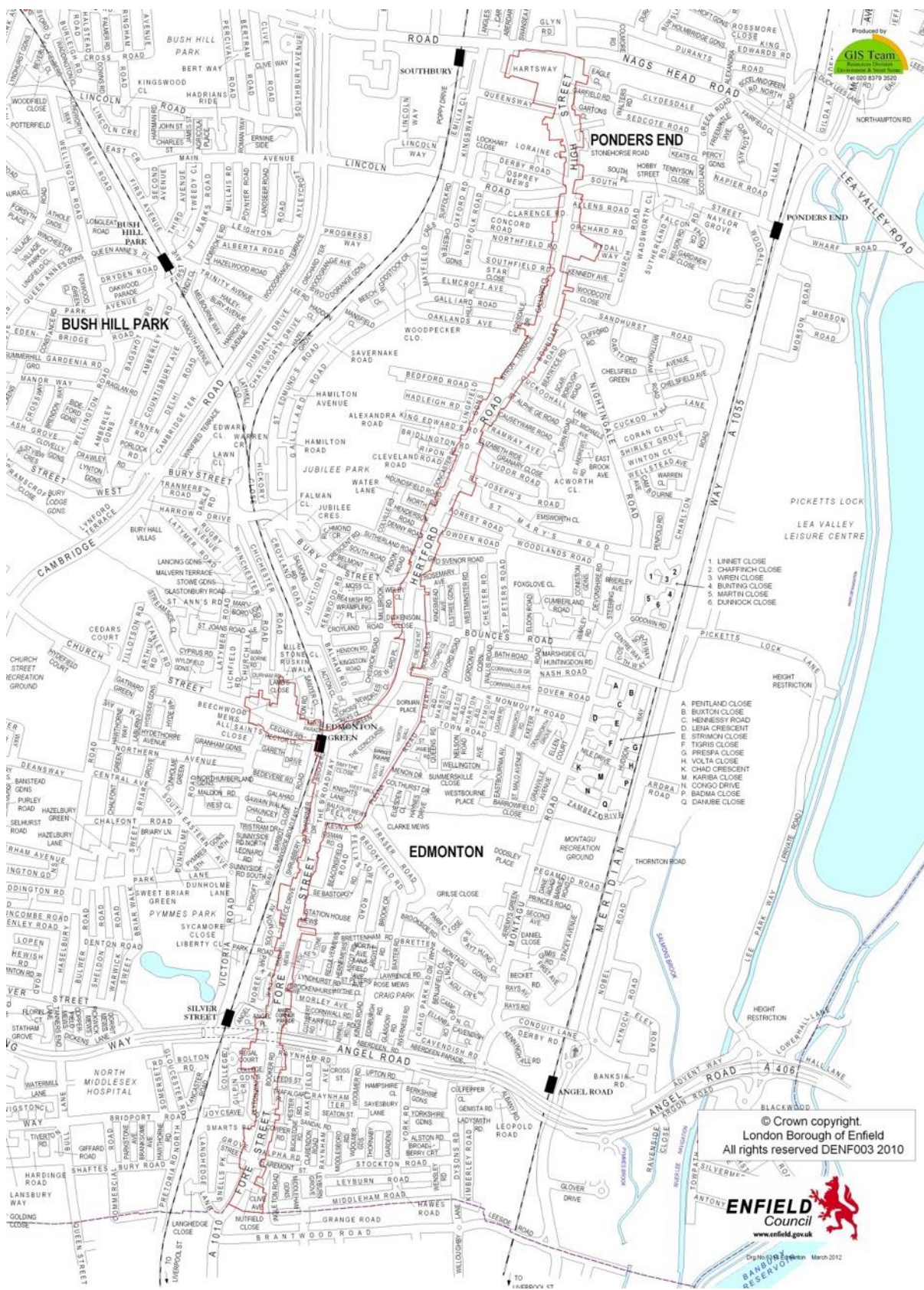
2.15 The data shows that the issues that the CIZs were established to address remain an ongoing concern for the Licensing Authority. In reviewing the data it is considered that the evidence supports the case for continuing CIZs in Upper Edmonton, Enfield Town, Enfield Highway and Southgate.

### *Establishment of new CIZs*

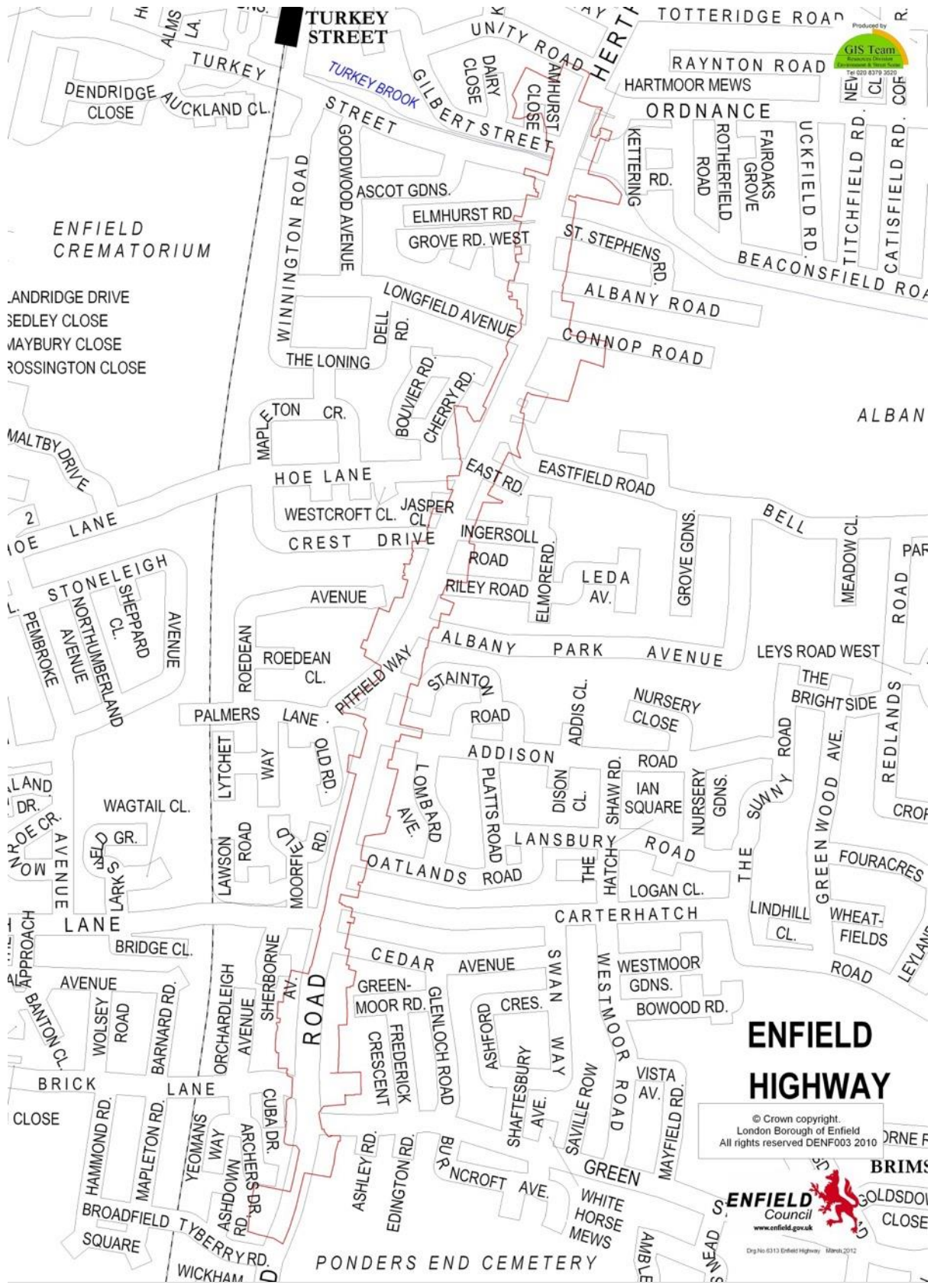
2.16 The data for the two proposed CIZs (Palmers Green and Bowes) is of a higher level than the existing CIZ area in Southgate and consistent trajectory. Both of these areas have been identified by the Licensing Authority and a number of Responsible Authorities (Police and Public Health in particular) as areas of concern in terms of licensing and crime and nuisance. In reviewing the data and key stakeholder views it is considered that the evidence supports the case for establishing CIZs in Palmers Green and Bowes.



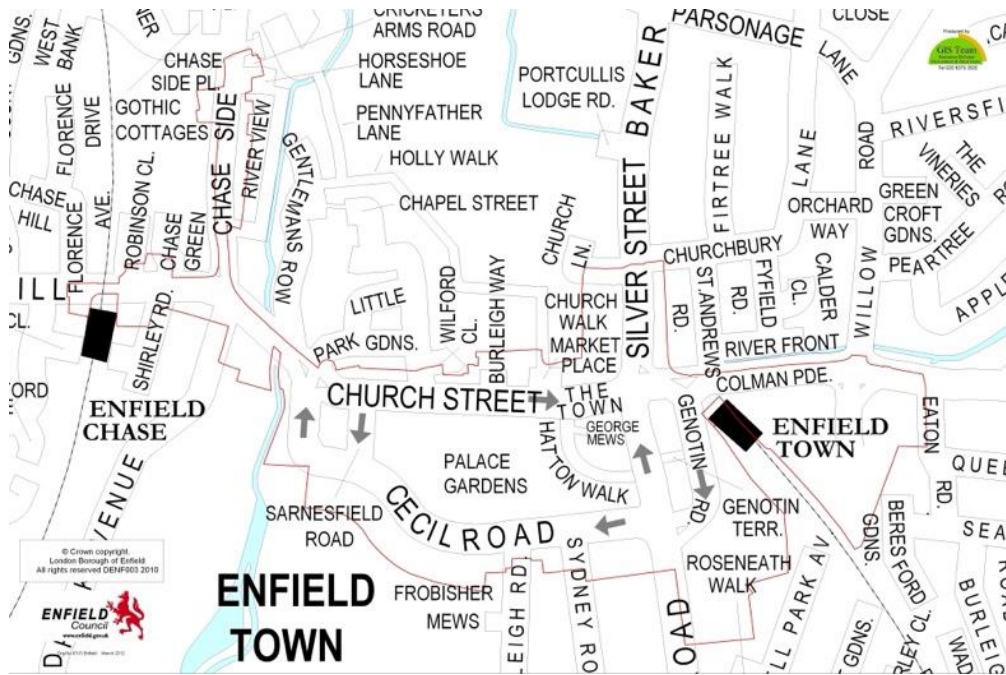
**ANNEX 2: THE EDMONTON CUMULATIVE IMPACT ZONE**



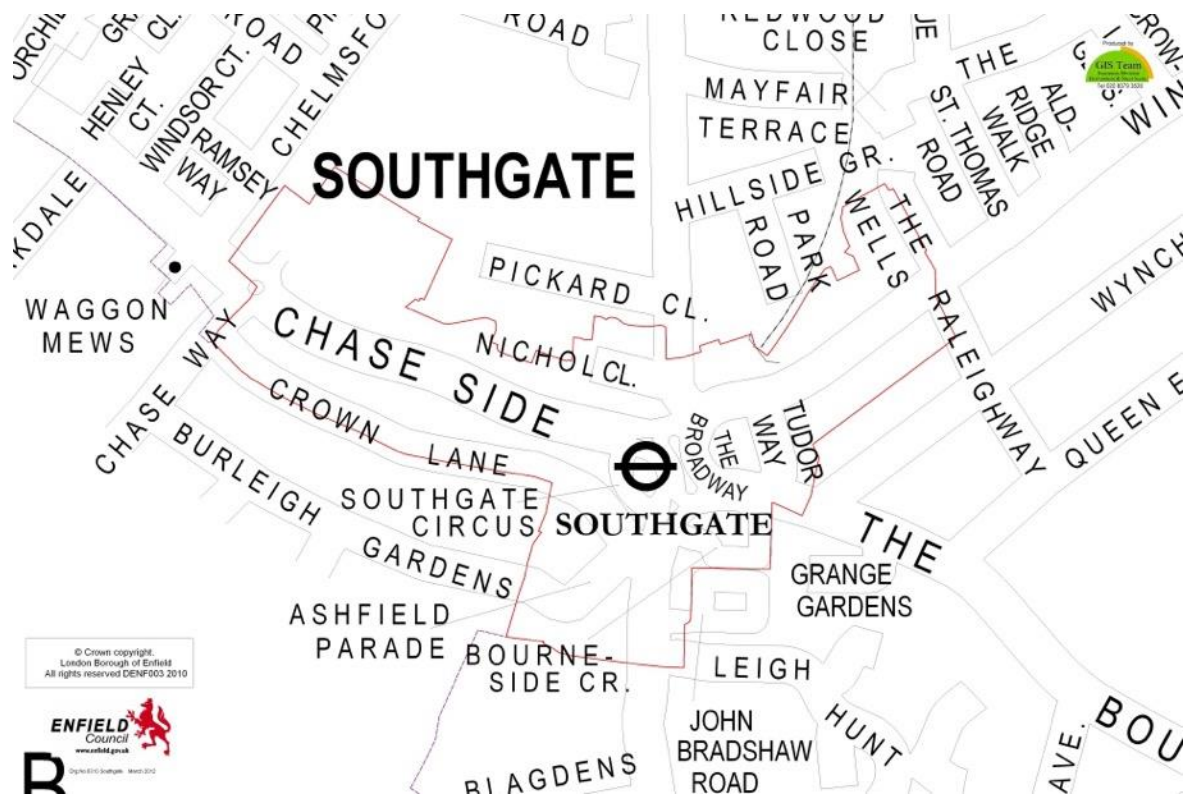
**ANNEX 3: THE ENFIELD HIGHWAY CUMULATIVE IMPACT ZONE**



**ANNEX 4: THE ENFIELD TOWN CUMULATIVE IMPACT ZONE**



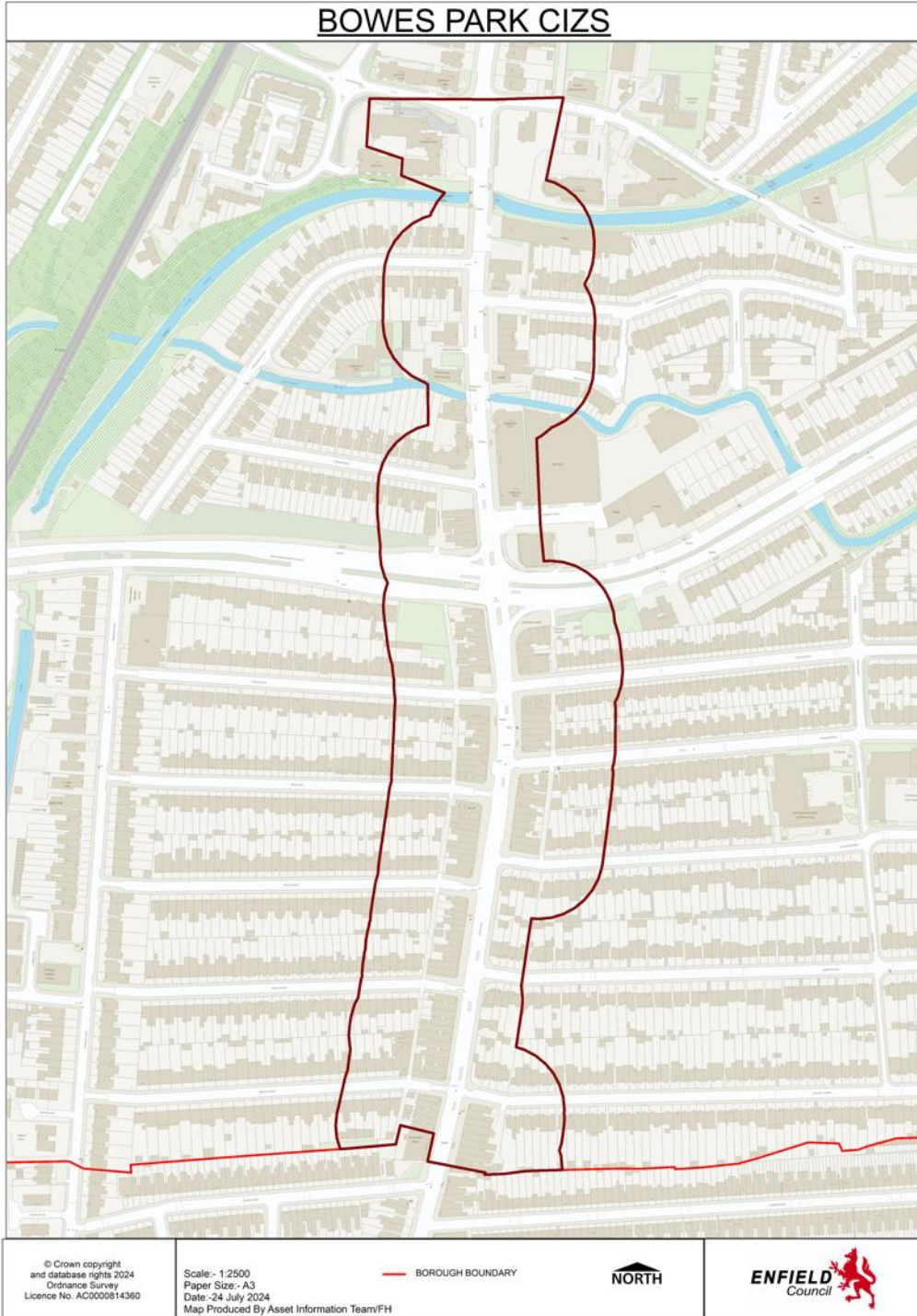
**ANNEX 5: THE SOUTHGATE CUMULATIVE IMPACT ZONE**



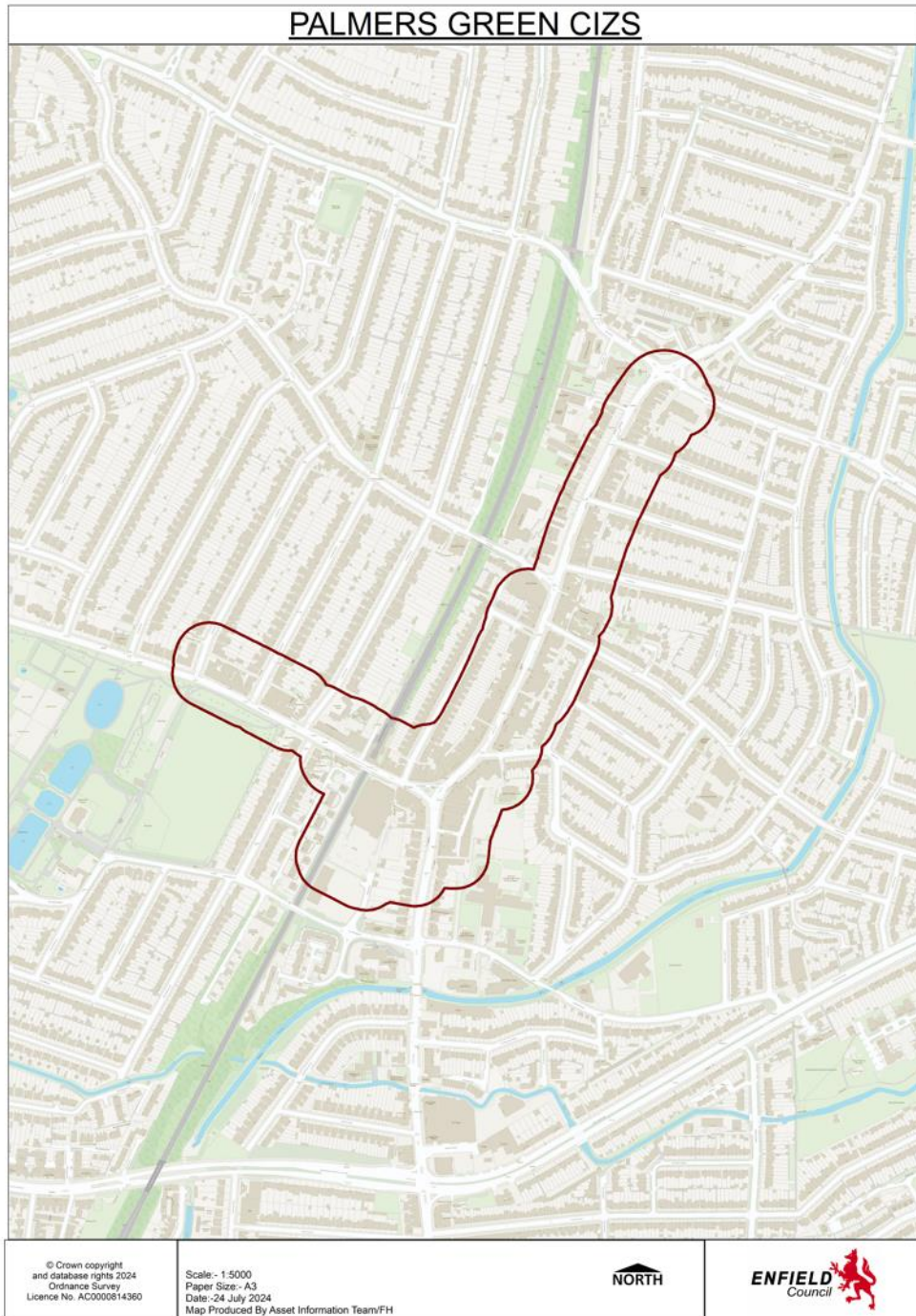
© Crown copyright,  
London Borough of Enfield  
All rights reserved DENF003 2010



**ANNEX 6: BOWES CUMULATIVE IMPACT ZONE**



**ANNEX 7: PALMERS GREEN CUMULATIVE IMPACT ZONE**



### ANNEX 8 - SUMMARY OF AGE RESTRICTIONS

8.1 The table below summarises certain age restrictions. The list is not exhaustive and is provided as a guide:

<b>Type of Premises</b>	<b>Access or sales restriction (Source in brackets)</b>
Premises exclusively or primarily used for the sale or supply of alcohol for consumption on the premises	No unaccompanied under 16's at any time (section 145 of the Act)  No under 18's after 23:00 (Policy)
Other licensed premises whilst open for the sale or supply of alcohol for consumption on those premises	No unaccompanied under 16's between the hours of midnight and 05:00 (section 145 of the Act)
All licensed premises whilst open for the sale or supply of alcohol for consumption on those premises	Under 18's only until 'specified cut-off time' identified in the premises licence (where applicable) (Policy)
Off-licensed premises	No unaccompanied under 14's after 21:00 (Policy)
All premises	No sale of alcohol to under 18's (except 16- and 17-year-olds where supplied as part of a table meal where an over 18 is present). (Section 146 of the Act)
Film exhibition	Restricted in accordance with film classification (Section 29 of the Act)

## ANNEX 9: POOL OF MODEL CONDITIONS

- 9.1 Please note that the conditions below seek to promote the licensing objectives when determining an application under the Licensing Act 2003. The conditions outlined below can be amended or added to from time to time separate from the review process for the Statement of Licensing Policy.
- 9.2 The Council, when exercising the licensing functions, must have regard to the Guidance issued by the Secretary of State under the Act.
- 9.3 Conditions which are appropriate to promote the licensing objectives should appear within the operating schedule from the prospective licence holder's assessment which form part of the application.
- 9.4 These conditions have been produced to assist applicants to consider where they would promote the licensing objectives in relation to their application and to assist the responsible authorities and other parties to provide a consistent approach when proposing conditions on licences.
- 9.5 This group of model conditions is not an exclusive or exhaustive list of conditions which may be imposed on a licence. It does not restrict any applicant, responsible authority, or other person from proposing any alternative conditions, nor would it restrict a licensing sub-committee from imposing any reasonable condition on a licence it considers appropriate for the promotion of the licensing objectives.

### PUBLIC SAFETY

PS1	The maximum number of persons on the premises at any one time shall not exceed .....
PS2	A suitable method e.g. clicker counters, for determining the number of persons on the premises at any one time shall be employed to ensure that the maximum permitted number is not exceeded.
PS3	Suitable beverages other than alcohol (including drinking water) shall be equally available for consumption with or otherwise as ancillary to table meals.
PS4	Alcohol shall not be supplied otherwise than to persons taking table meals for consumption by such persons as ancillary to the meal.
PS5	Should the premises remain open for non-licensable activities customer shall not have access to alcohol after the licensed hours. This shall be prevented by the use of shutters / locked fridges.
PS6	At least 2 members of staff shall be present on the shop floor of the premises at all times the premises are open for licensable activities / from ..... until closing.

### PREVENTION OF PUBLIC NUISANCE

PN1	The management shall make subjective assessments of noise levels outside at the perimeter of the premises approximately and at the
-----	--



	nearest noise sensitive location (insert level), whilst regulated entertainment is provided to ensure that noise from the premises does not cause a disturbance to local residents. Records shall be kept of the times, dates and any issues discovered. These records shall be kept for six months. Records must be made available to an authorised officer of the Council or police, upon request. Where monitoring by staff identifies that noise from the premises is audible at the perimeter, measures shall be taken to reduce this i.e. turning volume down.
PN2	There shall be no amplified music in the (insert location)
PN3	A noise-limiting device shall be installed to any amplification equipment in use on the premises. The noise-limiting device shall be maintained in effective working order and set to interrupt the electrical supply to any amplifier should the volume of the music be audible at the perimeter of the premises.
PN4	All external doors and windows to be kept closed but not locked whilst regulated entertainment / live or recorded music is being played.
PN5	The external area at the front of the premises shall be designated for the use of smokers from (insert hour) hours until closing time on (insert day) to (insert time and day) There shall be no more than (insert number) persons using this designated area during these times. The designated area shall be adequately supervised to control the number and behaviour of patrons so as to not cause noise nuisance. Notices shall be displayed in the area specifying the terms of its use and asking patrons to respect the needs of local residents and to use the area quietly. No alcoholic drinks or glass containers shall be taken into the designated smoking area during these times.
PN6	Supervisory staff shall ensure that no patrons remain in the external seating area to the front (or rear) of the premises after (insert time e.g. 22:30), except to enter or leave the premises. All moveable external seating shall be removed, where practicable, by (insert time e.g. 23:00)
PN7	At the conclusion of all regulated entertainment events a suitably worded announcement shall be made to the customers, requesting that they behave in a quiet manner whilst they are leaving the premises.
PN8	Prominent, clear and legible notices shall be displayed at all public exits from the premises requesting customers respect the needs of local residents and leave the premises area quietly. These notices shall be positioned at eye level and in a location where those leaving the premises can read them.
PN9	The car park shall be locked no later than 30 minutes after closing time to prevent members of the public parking in the car park after the premises has closed.
PN10	Staff shall actively discourage patrons from congregating around the outside of the premises.
PN11	The premises licence holder shall ensure that the pavement from the building line to the kerb edge immediately outside the premises, including the gutter/channel at its junction with the kerb edge, is kept

	clean and free from litter at all material times to the satisfaction of the Licensing Authority.
PN12	Prominent, clear and legible notices shall be displayed at all public exits from the premises requesting customers respect the surrounding area and dispose of litter in a responsible manner. These notices shall be positioned at eye level and in a location where those leaving the premises can read them.
PN13	Litter bins and wall mounted ashtrays shall be provided outside the premises.
PN14	All refuse and bottles shall be disposed of in bins quietly so as not to disturb neighbours or local residents. There shall be no disposal of glass bottles outside between 23:00 hours and 07:00 hours.
PN15	Deliveries will not be made to the premises between the hours of (insert time) and (insert time).

### PROTECTION OF CHILDREN FROM HARM

PC1	All staff shall receive induction and refresher training (at least every three months) relating to the sale of alcohol and the times and conditions of the premises licence.
PC2	All training relating to the sale of alcohol and the times and conditions of the premises licence shall be documented and records kept at the premises. These records shall be made available to the Police and/or Local Authority upon request and shall be kept for at least one year.
PC3	A 'Think 25' proof of age scheme shall be operated and relevant material shall be displayed at the premises.
PC4	A written record of refused sales shall be kept on the premises and completed when necessary. This record shall be made available to Police and/or the Local Authority upon request and shall be kept for at least one year from the date of the last entry.
PC5	No one under the age of 18 years shall be permitted to enter the premises unless accompanied by an adult.
PC6	Children under 14 years, not accompanied by an adult, are not permitted to remain at or enter the premises after 21:00 hours.
PC7	Children under the age of 18 are not permitted in the following areas of the premises (insert areas) between (insert time) hours and (insert time) hours and/or during the following licensable activities: (insert licensable activities).
PC8	Those under the age of 18 shall only be allowed on the premises to dine in the restaurant area and only when accompanied by an adult.
PC9	Any children on the premises after 19:30 must be there for the purpose of consuming a substantial table meal and be accompanied by an adult.
PC10	Cigarette Vending Machines and Gaming Machines shall be sited so that their use can be monitored by staff.
PC11	A personal licence holder is to be present on the premises and supervise the sale of

	alcohol, throughout the permitted hours for the sale of alcohol.
--	--

## PREVENTION OF CRIME & DISORDER

CD1	A minimum of (insert number) door supervisors shall be employed on the premises on (insert day) and (insert day) from (insert time) until the premises has closed. At least one door supervisor shall remain directly outside the premises for 30 minutes after the premises has closed or until all customers have dispersed. The duties of these staff will include the supervision of persons entering and leaving the premises to ensure that this is achieved without causing a nuisance. All door supervisors (or marshals) shall be easily identifiable by wearing high visibility jackets or armbands.
CD2	Any door supervisor employed must be from an SIA approved contractor scheme.
CD3	Toilets at the premises shall be checked for any sign of drug use on average of every hour /two hours between (insert time) hours and closing time on (insert day/s). A record shall be kept of the times, dates and any issues discovered. These records shall be kept for six months. Records must be made available to an authorised officer of the Council or police upon request.
CD4	At least six prominent, clear and legible notices shall be displayed throughout the premises, including all toilets warning customers that drug use will not be tolerated.
CD5	Signs shall be prominently displayed on the exit doors advising customers that the premises is in a Public Space Protection Order Area (or similar) and that alcohol should not be taken off the premises and consumed in the street. These notices shall be positioned at eye level and in a location where they can be read by those leaving the premises.
CD6	A log must be kept and signed by each door supervisor each night they are employed at the premises indicating that they have been informed of, understand, and will implement the entry and search policy. This log must be made available to Police or Local Authority employees on request.
CD7	A log must be kept indicating the date and times door supervisors sign in and out for duty and must include clearly printed details of each door supervisor's name, SIA licence number, employer, and the duty they are employed to carry out on any particular night.
CD8	A written entry and search policy must be adopted in consultation with police officers and implemented by door supervisors. This policy must include, but is not limited to: (a) Preventing the admission and ensuring the departure from the premises of the drunk and disorderly (without causing further unnecessary disorder or violence); (b) Keeping out excluded individuals (subject to court bans or imposed by the premises licence holder or his agent); (c) Search and exclude those suspected of carrying illegal drugs or offensive weapons; (d) Maintain orderly and reasonably quiet queuing outside the premises; (e) Encourage patrons to leave the premises and the area quietly

	and not to loiter outside the premises; (f) Ensuring that no alcoholic or other drinks are taken from the premises in open containers (e.g. glasses and opened bottles).
CD9	There shall be no entry or re-entry of patrons to the premises after (insert time) hours Monday to Sunday.
CD10	<p>A digital CCTV system must be installed in the premises complying with the following criteria:</p> <ol style="list-style-type: none"> <li>1. Cameras must be sited to observe the entrance and exit doors both inside and outside, the alcohol displays and floor areas.</li> <li>2. Cameras on the entrances must capture full frame shots of the heads and shoulders of all people entering the premises i.e. capable of identification.</li> <li>3. Cameras viewing till areas must capture frames not less than 50% of screen.</li> <li>4. Cameras overlooking floor areas should be wide angled to give an overview of the premises.</li> <li>5. Cameras must capture a minimum of 16 frames per second.</li> <li>6. Be capable of visually confirming the nature of the crime committed.</li> <li>7. Provide a linked record of the date, time and place of any image.</li> <li>8. Provide good quality images – colour during opening times.</li> <li>9. Operate under existing light levels within and outside the premises.</li> <li>10. Have the recording device located in a secure area or locked cabinet.</li> <li>11. Have a monitor to review images and recorded picture quality.</li> <li>12. Be regularly maintained to ensure continuous quality of image capture and retention.</li> <li>13. Have signage displayed in the customer area to advise that CCTV is in operation.</li> <li>14. Digital images must be kept for 31 days.</li> <li>15. Police will have access to images at any reasonable time.</li> <li>16. The equipment must have a suitable export method, e.g. CD/DVD writer so that the police can make an evidential copy of the data they require. This data should be in the native file format, to ensure that no image quality is lost when making the copy. If this format is non-standard (i.e. manufacturer proprietary) then the manufacturer should supply the replay software to ensure that the video on the CD can be replayed by the police on a standard computer. Copies must be made available to Police on request.</li> </ol>
CD11	Drinking vessels shall be made of toughened glass or plastic and shall be designed not to have a sharp edge when broken.
CD12	<p>An incident log shall be kept at the premises, and made available on request to an authorised officer of the Council or the Police, which will record the following:</p> <ol style="list-style-type: none"> <li>(a) all crimes reported to the venue</li> <li>(b) all ejections of patrons</li> </ol>

<p>(c) any complaints received  (d) any incidents of disorder  (e) any faults in the CCTV system  (f) any visit by a relevant authority or emergency service</p> <p><b>Immigration Offence Conditions</b></p> <ul style="list-style-type: none"> <li>• To be able to produce, to a Police Officer, local authority officer or Home Office Immigration Officer, proof of full compliance with the Home Office Full guide for employers on preventing illegal working in the UK, October 2013 issue or any subsequent issue. This proof to be produced within 24 hours.</li> <li>• To maintain on the premise a contemporaneous written record of the hours worked, by all persons. Such record shall as a minimum cover the previous 4 working weeks and must be available to be produced on demand, to a Police Officer, local authority officer or Home Office Immigration Officer. Records shall include the employees full name and address.</li> </ul> <p><i>Non-Duty Paid Alcohol/Tobacco Offence Conditions</i></p> <ul style="list-style-type: none"> <li>• Only the Premises Licence Holder, Designated Premises Supervisor or any member of staff authorised by the Premises Licence Holder shall purchase alcohol and / or tobacco stock.</li> <li>• The premises licence holder and any other persons responsible for the purchase of stock shall not purchase any goods from door-to-door sellers.</li> <li>• The premises licence holder shall ensure that all receipts for goods bought are kept together in a file or folder as evidence that they have been brought into the UK through legal channels. Receipts shall show the following details: <ol style="list-style-type: none"> <li>(1) Seller's name and address;</li> <li>(2) Seller's company details, if applicable;</li> <li>(3) Seller's VAT details, if applicable.</li> </ol> </li> </ul> <p>Copies of these documents shall be retained for no less than 12 months and shall be made available to police or authorised officers of the council on request within five working days of the request. The most recent three months' worth of receipts shall be kept on the premises and made available to the police or authorised officers of the council on request.</p> <ul style="list-style-type: none"> <li>• All tobacco products which are not on the tobacco display shall be stored in a container clearly marked 'Tobacco Stock'. This container shall be kept within the storeroom or behind the sales counter.</li> <li>• Tobacco products shall only be taken from the tobacco display behind the sales counter in order to make a sale.</li> </ul> <p><i>Delivery of Alcohol (i.e. warehouses, internet sales)</i></p> <ul style="list-style-type: none"> <li>• Alcohol sales will be transacted over the telephone or internet, customers will not purchase alcohol in person at the premises.</li> <li>• Adequate controls shall be in place to ensure that alcohol sales are only made and delivered to persons over the age of 18.</li> <li>• A 'Think 25' proof of age scheme shall be operated and relevant material shall be displayed on the website and all marketing material.</li> <li>• Deliveries of alcohol from the premises shall be made staff from the</li> </ul>
--

	<p>premises or by a recognised courier company.</p> <ul style="list-style-type: none"> <li>• Alcohol sales will be through the company's website only.</li> <li>• No sales of alcohol shall be made to members of the public who 'walk in' to the premises.</li> <li>• There shall be an age verification system set up on the website requiring the user to confirm that they are aged 18 or over before an order for alcohol can be placed.</li> <li>• A Challenge 25 policy shall be adopted at the premises. Any delivery of alcohol to anybody who appears to be under the age of 25 shall be asked to provide evidence of proof of age. If proof is not provided or if there is any doubt about the I.D., the delivery of alcohol shall be refused. The only forms of proof of age to be accepted shall be: Passport, Photographic Driving Licence or PASS approved I.D. card.</li> <li>• If there is no one available to take in the delivery, the courier shall not leave it in an unattended safe place for collection later. It can be left with a neighbouring property only if the Challenge 25 condition above is taken into account.</li> <li>• Delivery can only be made to a domestic dwelling or place of business.</li> <li>• The courier shall only collect the alcohol from the premises between 08.00 and 20.00 Monday to Sunday.</li> </ul> <p><i>Large scale events</i></p> <p>The premises licence holder shall submit a completed Events Management Plan and associated documentation that meets the requirements of the Licensing Authority and the Enfield Safety Advisory Group and implement it accordingly.</p>
--	---

### ADDITIONAL FOR CUMULATIVE IMPACT ZONES

CIZ1	Entry and exit to the premises will be managed to ensure patrons do not congregate outside the premises. In particular the entry to the premises and the pavement outside of the premises will be kept clear of patrons, ensuring that the pavements are not blocked and no nuisance is created for passers-by.
CIZ2	Smoking areas will be designated and managed to ensure no nuisance is created for residents nearby and passers-by. Patrons will be discouraged from smoking on the pavement outside of the premises.
CIZ3	The premises licence holder shall sign up to the Mayor of London's Women's Night Safety Charter and implement the current strategy (and/or equivalent). This shall be documented and made available to

	<p>the Police and/or Local Authority upon request and shall be retained for at least two years.</p> <p>The premises licence holder shall ensure all staff undertake induction and refresher training (at least every year) relating to the prevention of violence against women and girls. This training shall be documented and records kept at the premises.</p> <p>All training records shall be made available to the Police and/or Local Authority upon request and shall be kept for at least two years after the training was completed.</p>
--	---

## **ANNEX 10 – DOCUMENTS WHICH DEMONSTRATE ENTITLEMENT TO WORK IN THE UK**

### *Documents which demonstrate entitlement to work in the UK*

- 10.1 Applicants may be asked to demonstrate that they have the right to work in the UK and are not subject to a condition preventing them from doing work relating to the carrying on of a licensable activity. Guidance on how this can be demonstrated in specific circumstances is outlined in the linked webpage:

<https://www.gov.uk/government/publications/right-to-work-checklist/employers-right-to-work-checklist-accessible-version>

## **ANNEX 11 -SEXUAL ENTERTAINMENT VENUES AND SEX ESTABLISHMENTS**

- 11.1 The information below is provided for convenience and is complementary to, but does not form part of the Policy under the Act :

### **Sexual Entertainment Venues - Policing and Crime Act 2009**

- 11.2 On 28 March 2012 the Council resolved to refuse to adopt the sexual entertainment venues licensing provisions contained within the Policing and Crime Act 2009. Therefore, Sexual Entertainment Venue Licences will not be granted in Enfield.

### **Sex Establishments - Local Government (Miscellaneous Provisions) Act 1982 (as amended)**

- 11.3 The Council has adopted the legislation in relation to sex establishments.
- 11.4 The Council has resolved that the appropriate number of Sex Establishment Licences to be granted in the Borough is nil.
- 11.5 Any application received will be considered on its merits and in accordance with the Council's policy that the Licensing Sub-Committee should exercise caution in considering any such application.



**LONDON BOROUGH OF ENFIELD**

**GAMBLING ACT 2005**

**STATEMENT  
OF PRINCIPLES**

**Seventh Edition  
31 January 2025**



<b>SECTION</b>	<b>PAGE</b>
<b>Part 1: Context And General Principles</b>	<b>4</b>
1.1 Introduction	4
1.2 Profile of London Borough of Enfield	4
1.3 Purpose and Scope	5
1.4 Objectives	5
1.5 The Licensing Authority Functions	5
1.6 Consultation	6
1.7 Responsible Authorities	7
1.8 Interested Parties	7
1.9 Exchange of Information	8
1.10 Enforcement	9
1.11 Fundamental Rights	10
1.12 Other Regulatory Regimes	11
1.13 Gambling Prevalence and Problem Gambling	11
<b>Part 2: Administrative Processes</b>	<b>12</b>
2.1 Administration, Exercise and Delegation of Functions	12
2.2 Appeals Procedure	12
2.3 Giving Reasons for Decisions	12
2.4 Implementing the Determination of The Magistrates' Court	13
2.5 Complaints against Licensed Premises	13
2.6 Reviews	13
<b>Part 3: Specific Requirements</b>	<b>15</b>
3. Premises Licence	15
4. The Local Risk Profile and Risk Assessments by Operators	25
5. Premises Type Specific Considerations	28
6. Provisional Statements	33
7. Permits/Temporary and Occasional Use Notices	34

<b>8. Small Society Lotteries</b>	<b>39</b>
<b>9. Further Information</b>	<b>39</b>
<b>Appendix A – Definitions</b>	<b>41</b>
<b>Appendix B – Access to Premises</b>	<b>42</b>
<b>Appendix C – Summary of Machine Provisions by Premises</b>	<b>43</b>
<b>Appendix D: Schedule of Delegation of Licensing Functions and Decisions</b>	<b>44</b>
<b>Appendix E: Enfield’s Gambling Vulnerability Area</b>	<b>45</b>

## Statement of Licensing Policy

### **PART 1: CONTEXT AND GENERAL PRINCIPLES**

#### **1.1 Introduction**

- 1.1.1 The Gambling Act 2005 requires the Council to prepare and publish a “Statement of Licensing Policy” that sets out the principles the Council proposes to apply in exercising its licensing functions when dealing with applications for Premises Licences, as required by the Act. Appendix A provides more information on the definitions used of terms used within this Statement.
- 1.1.2 This Policy Statement takes effect on 31st January 2025. This Licensing Authority will update and publish a new Licensing Policy whenever necessary but in any case, within 3 years of the date of this Policy, and will fully consult with partners, trade associations and residents groups as appropriate at that time, and any representations received will be considered at that time.
- 1.1.3 However where updates are required due to changes in national legislation, statutory guidance or contact details the council reserves the right to amend this policy without consultation where it is necessary to ensure the policy reflects national legislation or statutory guidance.
- 1.1.4 In producing the final Policy Statement the Council declares that it has had regard to the licensing objectives of the Gambling Act 2005, the Guidance to Licensing Authorities issued by the Gambling Commission, any codes of practice and any responses from those consulted on the Policy Statement.
- 1.1.5 The Human Rights Act 1998 (as amended) incorporates the European Convention on Human Rights and makes it unlawful for a local authority to act in a way that is incompatible with such a right. The council will have regard to the Human Rights Act when considering any licensing issues, and particularly in respect of the way in which applications are considered and enforcement activities are carried out.
- 1.1.6 The council acknowledges that it may need to depart from this Policy and from the guidance issued under the Act in individual and exceptional circumstances, and where the case merits such a decision in the interests of the promotion of the licensing objectives. Any such decision will be taken in consultation with the appropriate legal advisors for the Licensing Authority, and the reasons for any such departure will be fully recorded.

#### **1.2 Profile of London Borough of Enfield**

1.2.1 The profile of London Borough of Enfield is found within the separate Local Area Profile document which supplements this Policy.

### **1.3 Purpose and Scope**

1.3.1 The aims of the Statement of Licensing Principles are to:

- inform licence applicants how this Authority will make licensing decisions and how
- licensed premises are likely to be able to operate within its area.
- set out how the Authority intends to support responsible operators and take effective actions against irresponsible operators.
- inform residents, business and licensed premises users, the protections afforded to the local community within the Act and by this Authority.
- support the Authority in making licensing decisions.

### **1.4 Objectives**

1.4.1 In exercising most of its functions under the Gambling Act 2005 the Council, as the Licensing Authority, must have regard to the following licensing objectives:

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
- Ensuring that gambling is conducted in a fair and open way;
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

1.4.2 It should be noted that the Gambling Commission has stated: "The requirement in relation to children is explicitly to protect them from being harmed or exploited by gambling".

### **1.5 The Licensing Authority Functions**

1.5.1 The Council is required under the Act to:

- Be responsible for the licensing of premises where gambling activities are to take place by issuing Premises Licences;
- Issue Provisional Statements;
- Regulate members' clubs who wish to undertake certain gaming activities via issuing Club Gaming Permits and/or Club Machine Permits;
- Issue Club Machine Permits to Commercial Clubs;
- Grant permits for the use of certain lower stake gaming machines at unlicensed family entertainment centres;
- Receive notification from alcohol licensed premises (under the Licensing Act 2003) of the use of two or fewer gaming machines;

- Issue Licensed Premises Gaming Machine Permits for premises licensed to sell/supply alcohol for consumption on the licensed premises, under the Licensing Act 2003, where there are more than two machines;
- Register small society lotteries below prescribed thresholds;
- Issue Prize Gaming Permits;
- Receive and endorse Temporary Use Notices;
- Receive Occasional Use Notices;
- Provide information to the Gambling Commission regarding details of licences issued (see section below on information exchange);
- Maintain registers of the permits and licences that are issued under these functions.

1.5.2 It should be noted that local licensing authorities are not involved in licensing remote gambling at all, which is regulated by the Gambling Commission via Operator Licences.

1.5.3 The Council recognises that the licensing function is only one means of promoting delivery of the three objectives and should not therefore be seen as a means for solving all problems within the community. The Council will therefore work in partnership with neighbouring authorities, Metropolitan Police Service, the Community Safety Partnership, local businesses, local people and those involved in child protection to promote the licensing objectives as outlined. In addition, the Council recognises its duty under Section 17 of the Crime and Disorder Act 1998, with regard to the prevention of crime and disorder.

## **1.6 Consultation**

1.6.1 The Council has consulted widely upon this Statement before finalising and publishing. A list of those persons consulted is provided below, in line with the Act and the Gambling Commission's Guidance.

- The Chief Officer of Police;
- The Fire Authority;
- One or more persons who appear to the authority to represent the interest of persons carrying on gambling businesses in the authority's area;
- One or more persons who appear to the authority to represent the interests of persons likely to be affected by the exercise of the authority's functions under the Gambling Act 2005;
- Departments (including Responsible Authorities) within the Council with an interest in the licensing of gambling;
- Local Safeguarding Children Board;
- Councillors;
- Other organisations as appear to be affected by licensing matters covered by this Statement;
- H.M. Revenue and Customs;

- 1.6.2 The Statement was also available on the Council's website ([www.enfield.gov.uk](http://www.enfield.gov.uk)).
- 1.6.3 Consultation took place between \*\*\* and \*\*\* and, as far as practicable, the Council followed the Consultation Principles issued by the government (last updated in \*\*\*\*) which is available at <https://www.gov.uk/government/publications/consultation-principles-guidance>
- 1.6.4 This policy was approved at a meeting of the Full Council on \*\*\*\* and was published on the Council's website by \*\*\*\*\*.

## 1.7 Responsible Authorities

- 1.7.1 In exercising the Council's powers under Section 157(h) of the Act to designate, in writing, a body that is competent to advise the Council about the protection of children from harm, the following principles have been applied:
- The need for the body to be responsible for an area covering the whole of the licensing authority's area; and
  - Answerable to democratically elected Councillors, rather than to any particular vested interest group.
- 1.7.2 In accordance with the Gambling Commission's Guidance this Council, as Licensing Authority, designates the Council's Director of Children and Families for this purpose.
- 1.7.3 The following are Responsible Authorities:
- The Gambling Commission
  - Her Majesty's Commissioners of Customs and Excise (now known as Her Majesty's Revenue & Customs)
  - The Metropolitan Police Service
  - The London Fire and Emergency Planning Authority
  - The Council, as Licensing Authority
  - The Council, as Planning Authority
  - The Council's Director of Children's Services
  - The Council's Environmental Health Service
  - The Council's Public Health Service
  - Any other person or body who may be prescribed by regulations made by the Secretary of State for Culture, Media and Sport ('the Secretary of State')

## 1.8 Interested Parties

- 1.8.1 Interested Parties can make representations about licence applications or apply for a review of an existing licence based on the three licensing objectives as detailed in paragraph 1.3 of this Policy Statement. An Interested Party is someone who in the opinion of the Council: -

- a) Lives sufficiently close to the premises to be likely to be affected by the authorised activities; and/or
- b) Has business interests that might be affected by the authorised activities; or
- c) Who represent persons who satisfy paragraph (a) or (b).

1.8.2 The following are not valid reasons to reject applications for premises licences:

- a) Moral objections to gambling
- b) The 'saturation' of gambling premises unless there is evidence that the premises poses a risk to the licensing objectives in that locality
- c) A lack of 'demand'
- d) Whether the proposal is likely to receive planning or building regulations consent

1.8.3 The Council has not specified a distance from the premises within which a person must live or have a business interest in order to be considered an interested party and will judge each case on its merits. The factors the Council may take into account when determining what 'sufficiently close' means for a particular application include:

- The size and nature of the premises
- The distance of the premises from the person making the representation, and the nature of their interest
- The potential impact of the premises and its catchment area

1.8.4 The term 'has business interests' will be given the widest possible interpretation in accordance with paragraph 1.7.3 and include partnerships, charities, faith groups and medical practices.

1.8.5 Interested Parties may include trade associations and trade unions, and residents' and tenants' associations. The Council will not however generally view these bodies as Interested Parties unless they have a member who can be classed as an interested person i.e. lives sufficiently close to the premises to be likely to be affected by the authorised activities and/or has business interests that might be affected by the authorised activities.

1.8.6 Unless the person making the representation is a locally elected councillor or Member of Parliament, the London Borough of Enfield as licensing authority will require written evidence that they represent identified interested parties. A letter from one of these persons will be sufficient.

1.8.7 If individuals wish to approach Councillors to ask them to represent their views then care should be taken that the Councillors are not part of the Licensing Committee dealing with the licence application.

## **1.9 Exchange of Information**



1.9.1 The Council will work closely with the Gambling Commission, the Metropolitan Police and with Responsible Authorities where there is a need to exchange information on specific premises. For example, where the Commission makes observations and representations on the suitability of the applicant for a premises licence or any other aspect of the application, the Commission and Council shall discuss matters relating to that application and the appropriate action to take.

1.9.2 Where relevant, information will be protected and the confidentiality of those making representations will be maintained.

## **1.10 Enforcement**

1.10.1 The Council's principles are that it will be guided by the Gambling Commission's Guidance to local authorities, the Regulators Code and the council's enforcement policy. It will endeavour to be:

- Proportionate: regulators should only intervene when necessary, remedies should be appropriate to the risk posed, and costs identified and minimised;
- Accountable: regulators must be able to justify decisions, and be subject to public scrutiny;
- Consistent: rules and standards must be joined up and implemented fairly;
- Transparent: regulators should be open, keep regulations simple and user friendly; and
- Targeted: regulation should be focused on the problem and minimise side effects.

1.10.2 As per the Gambling Commission's Guidance to Licensing Authorities, the Council will endeavour to avoid duplication with other regulatory regimes so far as possible.

1.10.3 The Gambling Commission have highlighted that local authorities in general are likely to receive very few, or no complaints about gambling. Unlike other regulated areas, such as alcohol, gambling is much less visible as a concern for residents. As a result, the Gambling Commission advises the Council to proactively conduct inspections, to build up the picture of whether a premises can establish true compliance, and can assess whether the necessary protections, especially for the young and vulnerable are in place and working effectively.

1.10.4 The Council aims to inspect new licensed premises shortly after the licence has been issued, and every premises should expect at least one inspection per year. Inspections of premises are also undertaken if complaints are received, if variation applications are received or there is some other intelligence that suggests an inspection is appropriate. Compliance will be checked in a daytime or evening inspection. Where a one-off event takes place under a Temporary Use Notice or Occasional Use Notice, the Council

may also carry out inspections to ensure the licensing objectives are being promoted.

1.10.5 High-risk premises are those premises that have a history of complaints, a history of non-compliance and require greater attention. The Council will operate a lighter touch in respect of low-risk premises so that resources are more effectively targeted to problem premises. We will also target enforcement towards illegal gambling as it is potentially higher risk/harm due to the lack of regulation and oversight that legitimate licensed gambling is subject to.

1.10.6 The Council continues to adopt and implement an inspection approach, based on:

- The licensing objectives;
- Relevant codes of practice;
- Guidance issued by the Gambling Commission, in particular at Part 36;
- The principles set out in this Statement of Licensing Policy.
- The council's enforcement policy.

1.10.7 The main enforcement and compliance role for this Council in terms of the Gambling Act 2005 is to ensure compliance with the Premises Licences and other permissions, which it authorises. The Gambling Commission is the enforcement body for the Operator and Personal Licences. Concerns about manufacture, supply or repair of gaming machines are not dealt with by the Council but should be notified to the Gambling Commission.

1.10.8 The council will take account of the Gambling Commissions guidance document issued in February 2015 (or any subsequent amendments) 'Approach to Test Purchasing' when considering making test purchases at gambling premises.

1.10.10 The Council's enforcement policy details the licensing authority's approach to inspections, criminal investigations and prosecutions and is available on the Council's website.

## **1.11 Fundamental Rights**

1.11.1 Under the terms of the Act any individual/company may apply for a variety of permissions and have their applications considered on their individual merits. Equally, any Interested Party or Responsible Authority has a right to make relevant representations on an application or to seek a review of a licence or certificate where provision has been made for them to do so in the Act.

1.11.2 Applicants and those making relevant representations in respect of applications to the Council have a right of appeal to the Magistrates Court against the decisions of the Council.

## **1.12 Other Regulatory Regimes**

1.12.1 When considering any application, the Council will avoid duplication with other regulatory regimes so far as possible. Therefore, the Council will not attach conditions to a licence unless they are considered reasonable and proportionate to the use of premises for gambling consistent with the licensing objectives.

## **1.13 Gambling Prevalence and Problem Gambling**

1.13.1 The Council has specifically noted in the Local Area Profile some specific risks of problem gambling and its impacts for residents that relate to gambling prevalence in Enfield.

1.13.2 Three key factors that are identified in the academic research literature are exposure, proximity and density. These factors are particularly important in their impact on younger and more vulnerable people and in economically deprived areas.

1.13.3 Evidence incorporated into the Enfield Local Area Profile shows that in the academic research literature<sup>1</sup> identifies that opportunities to gamble tend to be higher in deprived areas. This is shown the Local Area Profile for Enfield, with the highest concentrations of gambling premises being located in the most deprived areas of the borough, the areas which also have the highest levels of unemployment and households receiving Universal Credit. These premises also are shown to cluster in the most deprived areas, with higher density and proximity to the residents of these areas.

1.13.4 The research evidence included in the Enfield Local Area Profile shows that proximity to higher density areas results in higher rates of gambling behaviours and harms suffered by residents. Residents living within 0.7 km of a gambling venue were twice as likely be problem gamblers as those living more than 3.1km away (Pearce et al 2008). In particular younger people are affected by proximity and density, one study found that for 18–21-year-olds the likelihood of developing gambling problems increased by 39% for every additional gambling premises in their local area (Welte et al 2009).

1.13.5 The Authority is aware, from the Enfield Local Area Profile, of the increased risks shown in the academic literature and expect applicants to carefully consider how these risks can be addressed and ameliorated through their operating schedules and premises management practice.

---

<sup>1</sup> Enfield Local Area Profile (link to be included)

## **PART 2: ADMINISTRATIVE PROCESSES**

### **2. Decision Making**

#### **2.1 Administration, Exercise and Delegation of Functions**

- 2.1.1 The powers and duties of the Council under the Act may be carried out by the Licensing Committee, by a Sub-Committee or by one or more officers acting under delegated authority.
- 2.1.2 It is considered that many of the functions will be largely administrative in nature with no perceived areas of contention. In the interests of efficiency and cost effectiveness these will, for the most part, be carried out by officers.
- 2.1.3 The following schedule sets out the recommended delegation of functions and decisions by guidance. The Council may, nevertheless, refer any matter to the Licensing Committee or Sub-Committee.
- 2.1.4 The schedule of delegation of licensing functions is attached at Appendix E.

#### **2.2 Appeals Procedure**

- 2.2.1 Entitlements to appeal for parties aggrieved by decisions of the Council are set out in Sections 206 to 209 of the 2005 Act. Appeals must be made to the Magistrates Court for the area in which the licensing authority, which has considered the application, is situated.
- 2.2.2 An appeal has to be commenced by giving notice of the appeal by the appellant to; The Clerk to the Justices, North London Magistrates Court at the following address: North London Magistrates Court, Highbury Corner, 51 Holloway Road, London, N7 8JA, within a period of 21 days, beginning with the day on which the appellant was notified by the Council of the decision to be appealed against.
- 2.2.3 On determining an appeal, the Court may:
- Dismiss the appeal;
  - Substitute the decision appealed against with any other decision that could have been made by the licensing authority;
  - Remit the case to the licensing authority to dispose of the appeal in accordance with the direction of the Court;
  - Make an order about costs.

#### **2.3 Giving Reasons for Decisions**

- 2.3.1 In anticipation of such appeals, the Council will give full reasons for its decisions. The Council will address the extent to which decisions have been

made with regard to any relevant codes of practice and guidance issued by the Gambling Commission, reasonably consistent with the licensing objectives and in accordance with this Policy Statement.

## **2.4 Implementing the Determination of The Magistrates' Court**

2.4.1 As soon as the decision of the Magistrates' Court has been notified to all parties, the Council will not delay its implementation and necessary action will be taken forthwith unless ordered by a higher court to suspend such action (for example, as a result of an ongoing judicial review). The Act provides for no other appeal against the determination of the Magistrates' Court.

## **2.5 Complaints against Licensed Premises**

2.5.1 The Council will investigate complaints against licensed premises in relation to matters relating to the licensing objectives for which it has responsibility. In the first instance, complainants are encouraged to raise the complaint directly with the licence holder or business concerned to seek a local resolution.

2.5.2 Where an interested party has made either a valid representation about licensed premises or a valid application for a licence to be reviewed, the Council may initially arrange a conciliation meeting to address and clarify the issues of concern.

2.5.3 This process will not override the right of any interested party to ask that the Licensing and Gambling Sub-Committee consider their valid objections or for any licence holder to decline to participate in a conciliation meeting.

2.5.4 Due consideration will be given to all relevant representations unless they fit the exceptions in 5.6 below.

## **2.6 Reviews**

2.6.1 Requests for a review can be made by Interested Parties or Responsible Authorities. However, it is for the Council to decide whether the review is to be carried out based upon any relevant codes of practice and guidance issued by the Gambling Commission, reasonably consistent with the licensing objectives and in accordance with this Policy Statement.

2.6.2 The request for the review will also be subject to the consideration by the Council as to whether it is frivolous, vexatious, or whether it will not cause this Council to alter/revoke/suspend the licence, or whether it is substantially the same as previous representations or requests for review.

2.6.3 The Council can also initiate a review of a particular premises licence, or a particular class of premises licence on the basis of any reason, which it thinks is appropriate.

- 2.6.4 Once a valid application for a review has been received by the Council, representations can be made by responsible authorities and interested parties during a 28-day period. This period begins 7 days after the application was received by the Council, who will publish notice of the application within 7 days of receipt.
- 2.6.4 The Council must carry out the review as soon as possible after the 28-day period for making representations has passed.
- 2.6.5 The purpose of the review will be to determine whether the Council should take any action in relation to the licence. If action is justified, the options open to the Council are:
- add, remove or amend a licence condition imposed by the Council;
  - exclude a default condition imposed by the Secretary of State (e.g. opening hours) or remove or amend such an exclusion;
  - suspend the premises licence for a period not exceeding three months; and,
  - revoke the premises licence.
- 2.6.6 In determining what action, if any, should be taken following a review, the Council must have regard to the principles set out in Section 153 of the Act, as well as any relevant representations, and what consideration was given to local area risk profile. In particular, the Council may also initiate a review of a premises licence on the grounds that a premises licence holder has not provided facilities for gambling at the premises. This is to prevent people from applying for licences in a speculative manner without intending to use them.
- 2.6.7 Once the review has been completed, the Council must, as soon as possible, notify its decision to:
- the licence holder;
  - the applicant for review (if any);
  - the Commission;
  - any person who made representations;
  - the chief officer of police or chief constable; and,
  - Her Majesty's Commissioners for Revenue and Customs.

## **PART 3: SPECIFIC REQUIREMENTS**

### **3. Premises Licence**

#### **3.1 General Principles**

3.1.1 Premises Licences are subject to the requirements set out in the Gambling Act 2005 and regulations, as well as specific mandatory and default conditions, which are detailed in regulations issued by the Secretary of State. Licensing authorities are able to exclude default conditions and also attach others, where it is believed to be appropriate.

3.1.2 Applicants for premises licences will have already obtained an Operators Licence from the Gambling Commission and be subject to the Licensing Conditions and Codes of Practice before applying for a premises licence. The Council is aware that in making decisions about Premises Licences it should aim to permit the use of premises for gambling insofar as it thinks it:

- In accordance with any relevant code of practice issued by the Gambling Commission;
- In accordance with any relevant guidance issued by the Gambling Commission;
- Reasonably consistent with the licensing objectives; and,
- In accordance with this Policy Statement (including the local area risk profile) and the specific expectations set out in it.

3.1.3 The Council will also consider:

- Information from the applicants as to whether any licensing objectives concerns can be mitigated or overcome; and,
- Each application on its own merits with regard to all the above considerations.

3.1.4 It is appreciated that as per the Gambling Commission's Guidance for local authorities "moral objections to gambling are not a valid reason to reject applications for Premises Licences" and also that unmet demand is not a criterion for a licensing authority.

3.1.5 The Licence Conditions and Code of Practice (LCCP) issued by the Gambling Commission (version updated October 2020) places further onus on premises to complete a risk assessment based on code 10, the social responsibility code of the Code of practice provisions. The council will have regard to this code when considering applications. This is covered in detail in Section 6 of this statement.

#### ***Definition of "Premises":***

3.1.6 Premises is defined in the Act as "any place". Section 152 therefore prevents more than one premises licence applying to any place. But a single building could 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 be reasonably regarded as being different premises. This approach has been taken to allow large, multiple unit premises such as a pleasure park, pier, track or shopping mall to obtain discrete premises licences, where appropriate safeguards are in place. However, licensing authorities will pay particular attention if there are issues about sub-divisions of a single building or plot and should ensure that mandatory conditions relating to access between premises are observed.

3.1.7 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.

3.1.8 The Council takes particular note of the Gambling Commission's Guidance (7.26) for local authorities which states that licensing authorities should take particular care in considering applications for multiple licences for a building and those relating to a discrete part of a building used for other (non-gambling) purposes. In particular, they should be aware of the following:

- The third licensing objective seeks to protect children from being harmed by gambling. In practice that means not only preventing them from taking part in gambling, but also preventing them from being in close proximity to gambling. Therefore, premises should be configured so that children are not invited to participate in, have accidental access to or closely observe gambling where they are prohibited from participating;
- Entrances to and exits from parts of a building covered by one or more premises licences should be separate and identifiable so that the separation of different premises is not compromised, and people do not "drift" into a gambling area. In this context it should normally be possible to access the premises without going through another licensing premises or premises with a permit; and,
- Customers should be able to participate in the activity named on the premises licence.

3.1.9 The Guidance (7.30) provides more guidance on factors that need to be taken into account relating to premises.

## **3.2 Appropriate Licence Environment**

3.2.1 Where gambling facilities are provided at premises as a supplementary activity to the main purpose of the premises; e.g. shopping malls, the council will expect the gambling area to be clearly defined to ensure that customers are fully aware that they are making a choice to enter into the gambling premises, and that the premises is adequately supervised at all times.

3.2.2 The Council will consider these and any other relevant factors in making its decision, depending on all the circumstances of the case.



3.2.3 The Gambling Commission's Guidance (7.23) for relevant access provisions for each premises type is available here:

<https://www.gamblingcommission.gov.uk/guidance/guidance-to-licensing-authorities/part-7-access-to-premises>.

## **2.3 Premises “ready for gambling”**

3.3.1 The Guidance states that a licence to use premises for gambling should only be issued in relation to premises that the licensing authority can be satisfied are going to be ready to be used for gambling in the reasonably near future, consistent with the scale of building or alterations required before the premises are brought into use.

3.3.2 The provisional statement procedure may be used where construction of a premises is not yet complete, or if they need alteration, or if the applicant does not yet have a right to occupy them. In the latter case, it is not possible to make a premises licence application and the provisional statement procedure must be used.

3.3.3 In deciding whether a premises licence can be granted where there is outstanding construction or alteration works at a premises, the Council will determine applications on their merits, applying a two-stage consideration process:

- First, whether the premises ought to be permitted to be used for gambling; and,
- Second, whether appropriate conditions can be put in place to cater for the situation that the premises are not yet in the state in which they ought to be before gambling takes place.

3.3.4 Applicants should note that the Council is entitled to decide that it is appropriate to grant a licence subject to conditions, but it is not obliged to grant such a licence.

## **3.4 Other Considerations**

### ***Location:***

3.4.1 The Council is aware that demand issues cannot be considered with regard to the location of premises but that considerations in terms of the licensing objectives are relevant to its decision making. As per the Gambling Commission's Guidance for local authorities, the Council will pay particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder.

3.4.2 The Council will give careful consideration to premises located close to:

- Schools
- Youth clubs

- Recreational areas, particularly those catering for young persons
- Establishments providing care for children and young adults
- Establishments providing care for persons with learning difficulties or mental health issues
- Establishments used or occupied by gambling addicts
- Establishments likely to attract or house population groups likely to be vulnerable to risk of problematic gambling.

3.4.3 The Council has produced a local area profile including the information listed in 2.4.2 above; further details can be seen in the separate Local Area Profile document attached to this Policy.

3.4.4 It should be noted that any such policy does not preclude any application being made and each application will be decided on its merits, and operators are encouraged to provide information in their application that demonstrates they have existing policies and procedures to mitigate any risks.

3.4.5 Applicants will be expected to prepare risk assessments based on the location and identify risk controls (taking account of the local area risk profile produced by the Council), the type of gambling operation and the design of the premises. For further details see the separate Local Area Profile document attached to this Policy.

3.4.6 The Council will in all cases consider what measures may be needed to mitigate risk to the licensing objectives. In doing so it will take account of the information provided in the application by the operator, the local area profile, the risk assessment and whether any additional conditions are required to mitigate risk by reference to the LCCP produced by the Gambling Commission.

***Planning:***

3.4.7 The Gambling Commission Guidance to Licensing Authorities states:

- In determining applications, the licensing authority should not take into consideration matters that are not related to gambling and the licensing objectives. One example would be the likelihood of the applicant obtaining planning permission or building regulations approval for their proposal.

3.4.8 The Council will not take into account irrelevant matters as per the above guidance. In addition, the Council notes the following excerpt from the Guidance:

- When dealing with a premises licence application for finished buildings, the licensing authority should not take into account whether those buildings must comply with the necessary planning or building consents. Those matters should be dealt with under relevant planning control, building and other regulations, and must not form part of the consideration for the premises licence. Section 210 of the 2005 Act prevents licensing

authorities taking into account the likelihood of the proposal by the applicant obtaining planning or building consent when considering a premises licence application. Equally the grant of a gambling premises licence does not prejudice or prevent any action that may be appropriate under the law relating to planning or building.

### **Enfield's Gambling Vulnerability Area**

3.4.9 The Council will give specific attention to the areas along and adjacent to Hertford Road and parts of the Haselbury, Lower Edmonton and Jubilee wards as areas of increased risk for gambling related harm. The location of these areas will *mirror the current Edmonton and Enfield Highway Cumulative Impact Zones* (as outlined in the Enfield Statement of Licensing Policy).<sup>2</sup> The specific roads and areas included in this Vulnerability Area are identified in Annex C.

3.4.10 The Local Area Profile (Annex C) has outlined that these areas are of particular risk for both the development by individuals of problem gambling habits and of being more vulnerable to the impacts of problem gambling than many other areas in Enfield. In particular levels of social and economic vulnerability are higher in these areas than in the rest of Enfield. Research evidence shows that the risk of developing problem gambling habits and impact of this on individuals is higher where the individuals are:

- Economically vulnerable: we have used being unemployed, being in receipt of universal credit, or being in an area of high deprivation as indicators for economic vulnerability.
- Vulnerable due to mental health issues: we have used higher levels of depression and anxiety disorder in local areas as an indicator of the higher levels of risk that may be associated with gambling in these localities.
- Exposed to higher levels of gambling premises and availability of opportunities to gamble or experience others' gambling in their youth: we have used proximity to schools and childcare facilities as an indicator for this.

3.4.11 Applicants in these areas are expected to pay special attention to outlining the specific measures they will put in place to limit the risk to economically vulnerable, those vulnerable due to mental health conditions and young adults as well as children. The Authority expects this to be a specific section of their operating schedule, and to ensure that staff are trained to be aware of these vulnerabilities and to be able to implement the specific measures outlined in the operation schedule.

---

<sup>2</sup> [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0019/6337/licensing-policy-6th-edition-licensing-act-business-and-licensing.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0019/6337/licensing-policy-6th-edition-licensing-act-business-and-licensing.pdf) (note that this will be updated to align with the new Statement of Licensing Policy to be published in January 2025)

### 3.5 Casinos

3.5.1 On the 8<sup>th</sup> November 2006 full Council of the London Borough of Enfield, in accordance with Section 166 of the Gambling Act 2005, passed a 'no casino' resolution. This came into effect in January 2007.

3.5.2 The "nil casino" resolution lapses after three years so, should the licensing authority wish to keep the policy in place, they should re pass a resolution every three years.

3.5.3 The "nil casino" resolution was reconsidered and upheld by full Council on the 6<sup>th</sup> November 2024 and came into effect as per the date of this policy.

3.5.4 The nil casino resolution is based on the following:

- Demographics of the borough.
- Possible risks to the licensing objective of protection of children and vulnerable adults.
- Possible links between deprivation and problem gambling.

3.5.4 There is no right of appeal against this resolution.

3.5.5 The Council has power to revoke the 'nil casino' resolution, should it wish to do so at a future date.

### 3.6 Duplication with other Regulatory Regimes

3.6.1 The Council seeks to avoid any duplication with other statutory/regulatory systems where possible, including planning. The Council will not consider whether a licence application is likely to be awarded planning permission or building regulations approval in its consideration of it. It will though listen to, and consider carefully, any concerns about conditions, which are not able to be met by licensees due to planning restrictions, should such a situation arise.

### 3.7 Licensing Objectives

3.7.1 Premises licences granted must be consistent with the licensing objectives. With regard to these objectives, the Council has considered the Gambling Commission's Guidance to licensing authorities and some comments are made below.

***Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime:***

3.7.2 This licensing objective is concerned with crime or disorder. Examples of this are if the premises were associated with gang activity, violence, drugs, or organised crime.

3.7.3 The Council is aware that the Gambling Commission takes a leading role in preventing gambling from being a source of crime. The Gambling

Commission's Guidance does, however, envisage that licensing authorities should pay attention to the proposed location of gambling premises in terms of this licensing objective. For example, in considering an application for a premises licence or permit that is in an area noted for particular problems with disorder, organised criminal activity etc, the Council will consider what, if any, controls (e.g. conditions) might be appropriate to prevent those premises being associated with or used to support crime. These might be conditions identified by the operator's own risk assessment or conditions the Council consider appropriate due to the local area profile.

- 3.7.4 The Council is aware of the distinction between disorder and nuisance. Issues of nuisance cannot be addressed via the Gambling Act provisions. For example, noise from music, gambling machines or customers from a gambling premises cannot be addressed under the Gambling Act but can using other legislation.
- 3.7.5 It is expected that applicants address the ways in which their operating schedule, staff training and management practice will address this objective.
- 3.7.6 In particular it is expected that:
- Any issues with drugs or drug dealing in gambling premises will be dealt with in accordance with a clear and well communicated policy and that any incidents are logged and reported to the Police.
  - Staff are trained in dealing with incidents, such as contacting police, protocols for closing or partitioning parts of the premises subsequent to any incidents as may be appropriate, and in policies for customer and staff safety.

***Ensure that gambling is conducted in a fair and open way:***

- 3.7.7 The Council has noted that the Gambling Commission states that it does not expect licensing authorities to become concerned with ensuring that gambling is conducted in a fair and open way, as this will be addressed via operating and personal licences.
- 3.7.8 If the Council suspect gambling is not being conducted in a fair and open way, it would be brought to the attention of the Gambling Commission. There is, however, more of a role with regard to tracks, which is explained in more detail in the "tracks" section.

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

- 3.7.9 The Council has noted the Gambling Commission's Guidance for local authorities states that this objective means preventing children from taking part in gambling (as well as restriction of advertising so that gambling products are not aimed at or are, particularly attractive to children). The Council will, therefore, consider, as suggested in this Guidance, whether specific measures are required at particular premises, with regard to this licensing objective. Appropriate measures may include supervision of entrances/machines, segregation of areas, etc.

- 3.7.10 The Council is also aware of the Codes of Practice, which the Gambling Commission issues as regards this licensing objective, in relation to specific premises.
- 3.7.11 As regards the term vulnerable persons it is noted that the Gambling Commission does not seek to offer a definition but states that “it will for regulatory purposes assume that this group includes people who gamble more than they want to; people who gamble beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs”. The Council will consider this licensing objective on a case-by-case basis.
- 3.7.12 Issues relating to vulnerable persons are outlined in 1.13 of this policy and note the need for applicants to specifically consider how this matter will be addressed in applications. Furthermore, the area of the Hertford Road and Edmonton outlined in 3.4.9 to 3.4.11 are areas identified for applicants to make additional consideration for how they will address the prevention of harm to children and vulnerable persons.
- 3.7.13 Geofutures Gambling and Place research for Westminster and Manchester City Councils<sup>3</sup> identified the following groups as vulnerable to gambling-related harm:
- children, adolescents and young adults (including students)
  - people with mental health issues, including those experiencing substance abuse issues (problem gambling is often ‘co-morbid’ with these substance addictions<sup>8</sup>)
  - individuals from certain minority ethnic groups, such as Asian/Asian British, Black/
  - Black British and Chinese/other ethnicity
  - the unemployed
  - the homeless
  - those with low intellectual functioning
  - problem gamblers seeking treatment
  - people with financially constrained circumstances
  - those living in deprived areas.
- 3.7.14 Section 7 of the Gambling Commission Guidance to Local Authorities sets out considerations that an operator must make in order to protect children, young people and vulnerable persons from accessing gambling premises.
- 3.7.15 The Licence Conditions and Codes of Practice (LCCP, Code 3.2) prescribe how operators must prevent children from using age restricted gaming or gambling activities, particularly where gaming machines are licensed.

---

<sup>3</sup> ‘Exploring area-based vulnerability to gambling-related harm: Developing the gambling-related harm risk index’ and ‘Exploring area-based vulnerability to harm: who is vulnerable?’, Heather Wardle, Gambling and Place Research Hub, Geofutures, 9th February 2016’

3.7.16 The council will expect all operators to have policies and procedures in place as required by the LCCP codes on social responsibility to cover all aspects of the code, in particular staff training records and self-exclusion records.

3.7.17 Further provisions with regard to self-exclusion and marketing are included in the social responsibility code. The council will take all conditions and codes into account when considering applications or performing enforcement activities.

### **3.8 Bet-Watch Enfield**

3.8.1 The council encourage and will support local operators to create and maintain an information sharing network to discuss issues of problem gamblers that are identified. This will also be an opportunity for operators to discuss issues with the licensing officers and Metropolitan Police.

### **3.9 Conditions**

3.9.1 Premises applying for licences are already subject to mandatory and default conditions. Additional conditions would only be imposed where there is clear evidence to the risk to the licensing objectives in the circumstances of a particular case such that the mandatory and default conditions are needed to be supplemented.

3.9.2 Any conditions attached to licences will be proportionate and will be:

- Relevant to the need to make the proposed building suitable as a gambling facility;
- Directly related to the premises (including the locality and any identified local risks) and the type of licence applied for;
- Fairly and reasonably related to the scale and type of premises; and
- Reasonable in all other respects.

3.9.3 Decisions upon individual conditions will be made on a case-by-case basis, although there will be a number of measures the Council will consider utilising should there be a perceived need, such as the use of supervisors, appropriate signage for adult only areas, etc. There are specific comments made in this regard under some of the licence types below. The Council will also expect the licence applicant to offer his/her own suggestions as to ways in which the licensing objectives can be met effectively.

3.9.4 In order to inform such suggestions, applicants will be expected to prepare risk assessments based on the location and range of clientele of the premises, and to take account of any local area profile produced by the Council.

- 3.9.5 The Council will in all cases consider what measures may be needed to mitigate risk to the licensing objectives. In doing so it will take account of the information provided in the application by the operator, the local area profile, the risk assessment and whether any additional conditions are required to mitigate risk by reference to the LCCP.
- 3.9.6 The Council will also consider specific measures, which may be required for buildings, which are subject to multiple premises licences. Such measures may include the supervision of entrances; segregation of gambling from non-gambling areas frequented by children; and the supervision of gaming machines in non-adult gambling specific premises in order to pursue the licensing objectives.
- 3.9.7 The Council will have consideration for the Gambling Commission's "Code of practice for gaming machines in clubs and premises with an alcohol licence"<sup>4</sup> also ensure that where category C or above machines are on offer in premises to which children are admitted:
- All such machines are located in an area of the premises which is separated from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance; 3
  - Only adults are admitted to the area where these machines are located;
  - Access to the area where the machines are located is supervised;
  - The area where these machines are located is arranged so that it can be observed by the staff or the licence holder; and,
  - At the entrance to and inside any such areas there are prominently displayed notices indicating that access to the area is prohibited to persons under 18.
- 3.9.8 The Council is aware that racing tracks may be subject to one or more than one premises licence, provided each licence relates to a specified area of the track. As per the Gambling Commission's Guidance, this Council will consider the impact upon the second and third licensing objectives and the need to ensure that entrances to each type of premises are distinct and that children are excluded from gambling areas where they are not permitted to enter.
- 3.9.10 It is noted that there are conditions, which the Council cannot attach to premises licences, which are:
- Any condition on the premises licence which makes it impossible to comply with an operating licence condition;
  - Conditions relating to gaming machine categories, numbers, or method of operation;
  - Conditions which provide that membership of a club or body be required (the Gambling Act 2005 specifically removes the membership requirement

---

<sup>4</sup> <https://www.gamblingcommission.gov.uk/authorities/codes-of-practice/9>



- for casino and bingo clubs and this provision prevents it being reinstated); and
- Conditions in relation to stakes, fees, winning or prizes.

## **4. The Local Risk Profile and Risk Assessments by Operators – Licensing Conditions and Codes of Practice 2018 (LCCP)**

### **4.1 LCCP**

- 4.1.1 The Gambling Commission updated the LCCP in April 2024 with a commencement date of 1 April 2024. Details regarding the LCCP can be accessed via the Gambling Commission website at <https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp/online>.

### **4.2 Risk Assessments**

- 4.2.1 A risk assessment is required from all operators. All applicants and licensees must assess local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, have policies, procedures, and control measures to mitigate those risks. This is a social responsibility code provision and compliance is mandatory. It is a condition of an operating licence that there is compliance with social responsibility code provisions.
- 4.2.2 Operators shall submit the risk assessment to licensing authorities upon application either for new premises licence or variation of a premises licence, or otherwise on request, and this will form part of the council's inspection regime and shall be requested when officers are investigating complaints.
- 4.2.3 Any failure to provide a risk assessment will be taken into account by the Council in determining the application, and such inferences will be made about potential harm to the licensing objectives as appear appropriate.
- 4.2.4 The Council considers that these risk assessments are a key component of the overall assessment and management of the local risks. The Council expects the Borough's local area profile and matters such as the following to be considered by operators when making their risk assessment:
- Information held by the licensee regarding self-exclusions and incidences of underage gambling;
  - Gaming trends that may reflect benefit payments;
  - Arrangement for localised exchange of information regarding self-exclusions and gaming trends;
  - Urban setting such as proximity to schools, commercial environment, factors affecting footfall;

- Range of facilities in proximity to the licensed premises such as other gambling outlets, banks, post offices, refreshment and entertainment type facilities;
- Known problems in the area such as problems arising from street drinkers, youths participating in anti-social behaviour, drug dealing activities, etc.;
- and,
- The ethnicity, age, economic makeup of the local community.

4.2.4 The risk assessment should cover the risks and character of the local area, the gambling operation and the design of the premises.

4.2.5 Operators in the areas outlined under 3.4.9 to 3.4.11 and in Annex E are expected to take these additional considerations into account when preparing their risk assessments.

### **4.3 The Gambling Operation**

4.3.1 In assessing the risk factors associated with a gambling operation the assessor should take into account the local area profile and how that gambling operation may affect that risk. The assessor may wish to consider:

- How the gambling operation will relate to how the operator conducts its business;
- What gambling products it provides in the premises;
- The facilities to enable gambling within the premises;
- The staffing levels within the premises;
- The level and requirement for staff training;
- Whether loyalty or account cards are used or not;
- The policies and procedures it has in place in relation to regulatory requirements of the Act or to comply with the LCCP;
- The security and crime prevention arrangements it has in place;
- How it advertises locally and on the premises;
- The marketing material within the premises; and,
- The display and provision of information, etc.

### **4.4 The Design of the Premises**

4.4.1 The design and layout of the premises is a key consideration as this could have a significant impact on the risk to the licensing objectives. In assessing the risk factors associated with the premises design and layout reference is needed to the local area risks factors already identified to ensure the design doesn't add to that risk. The design, both internal and external should be considered and specific risk factors identified and noted. For example:

- The premises may have a number of support pillars which the assessor identifies as obstructing the view of the gaming machines from the cashier counter
- The assessor may identify that the design of the entrance to the casino is not sufficiently covered by CCTV to enable the identification of offenders.

- Premises which are located within an area which has a high number of children and young people present throughout the day, may identify that their standard external design means that children, young people and vulnerable people can see into the premises and see gambling taking place.
- If a premises has a large amount of glass frontage in an area prone to criminal damage, the assessor may consider the risk of damage to the standard toughened glass to be high.

## **4.5 Local Area Profile**

- 4.5.1 Enfield's local area profile is our assessment of the local environment and the maps in Section 1 of the Local Area Profile document identify the key characteristics of Enfield. It is intended that the local area profile will provide us, operators and the public with a better understanding and awareness of the gambling-related risks in the Borough. In this context, risk includes actual and potential risk and also takes into account any future or emerging risks.
- 4.5.2 Our local area profile takes account of a wide number and range of factors and information. It enables us better to serve our local community by providing clarity for operators as to the relevant factors we will consider in our decision making and it enables us to make evidence-based decisions from a clear and published set of factors and risks
- 4.5.3 We expect that the local area profile will lead to improved premises licence applications and that operators will be able to incorporate controls and measures within their applications to mitigate risk. Through this pro-active approach to risk, we expect to achieve a reduction in non-compliance and enforcement action.
- 4.5.4 We accept that the local environment can change, and we must therefore retain the ability to review and quickly update the local area profile so that we remain aware of the current and emerging risks. For this reason, we have not included our local area profile within the body of this Policy, and we have published it as a separate document. This will allow us to update factual information within the local area profile and to quickly assess new or emerging risks from which to inform our decisions without the need for full consultation.
- 4.5.5 We expect operators to update their local risk assessments to take account of any changes in Enfield's local area profile. To assist, we will inform all operators when we make any changes to our local area profile.

## **4.6 Door Supervisors**

- 4.6.1 The Gambling Commission advises in its Guidance to licensing authorities that if it is concerned that a premises may attract disorder or be subject to attempts at unauthorised access (e.g. by children and young persons) then it may require that the entrances to the premises are controlled by a door supervisor and is entitled to impose a premises licence to this effect.

4.6.2 Where it is decided that supervision of entrances/machines is appropriate for particular cases, a consideration of whether these need to be SIA licensed or not will be necessary. It will not be automatically assumed that they need to be licensed as the statutory requirements for different types of premises vary.

## **5. Premises type specific considerations**

### **5.1 Adult Gaming Centres**

5.1.1 The Council will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the Council that there will be sufficient measures to, for example, ensure that under 18-year-olds do not have access to the premises.

5.1.2 Where gambling facilities are provided at premises as a supplementary activity to the main purpose of the premises; e.g. shopping malls, the council will expect the gambling area to be clearly defined to ensure that customers are fully aware that they are making a choice to enter into the gambling premises and that the premises is adequately supervised at all times.

5.1.3 This Council may consider measures to meet the licensing objectives such as:

- Proof of age schemes
- CCTV
- Supervision of entrances/machine areas
- Physical separation of areas
- Location of entry
- Notices/signage
- Specific opening hours
- Self-exclusion schemes
- Provision of information leaflets/helpline numbers for organisations such as GamCare
- ATMs and cash terminals located separately from gaming machines and displaying GamCare Helpline information.

5.1.4 This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

### **5.1 (Licensed) Family Entertainment Centres**

5.1.1 The Council will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the Council, for example, that there will be sufficient measures to ensure that under 18-year-olds do not have access to the adult only gaming machine areas.

5.1.2 The Council may consider measures to meet the licensing objectives such as:

- Proof of Age Schemes
- CCTV
- Supervision of entrances/machine areas
- Physical separation of areas
- Location of entry
- Notices/signage
- Specific opening hours
- Self-exclusion schemes
- Provision of information leaflets/helpline numbers for organisations such as GamCare
- ATMs and cash terminals located separately from gaming machines and displaying GamCare Helpline information
- Measures/training for staff on how to deal with children on the premises, for example, suspected truancy from school.

5.1.3 This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

### **5.3 Bingo Premises**

5.3.1 This Council notes that the Gambling Commission's Guidance states: Licensing Authorities will need to satisfy themselves that bingo can be played in any bingo premises for which they issue a premises licence. This will be a relevant consideration where the operator of an existing bingo premises applies to vary their licence to exclude an area of the existing premises from its ambit and then applies for a new premises licence, or multiple licences, for that or those excluded areas.

5.3.2 The Council is aware that a holder of bingo premises licences may make available for use of a number of category B gaming machines, not exceeding 20% of the total number of gaming machines, which may be available for use on the premises without time restrictions i.e. can be played 24 hours per day.

5.3.3 Those under the age of 18 years old are allowed into bingo premises; however, they are not permitted to participate in the bingo and if category B or C machines are made available for use, these must be separated from areas where children and young people are allowed.

5.3.4 The Council will specifically have regard to the need to protect children, young people and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority, for example, that there will be sufficient measures to ensure that under 18-year-olds do not have access to the adult only gaming machine areas.

5.3.5 Other appropriate measures may cover (but are not limited to) issues such as:

- CCTV
- Supervision of entrances/machine areas
- Physical separation of areas
- Location of entry
- Notices/signage
- Specific opening hours
- Self-barring schemes
- Provision of information leaflets/helpline numbers for organisations such as GamCare and self-exclusion forms in both prominent and discreet areas of the premises
- ATMs and cash terminals located separately from gaming machines and displaying GamCare Helpline information
- Measures / training for staff on how to deal with suspected truant school children on the premises

## 5.4 Betting Premises

### ***Betting machines:***

5.4.1 The Act provides that a machine is not a gaming machine if it is designed or adapted for use to bet on future real events. Some betting premises may make available machines that accept bets on live events, such as horseracing, as a substitute for placing a bet over the counter. These betting machines, also known as self-serve betting terminals (SSBTs), are not gaming machines: they merely automate the process that can be conducted in person and, and the Act exempts them from regulation as a gaming machine.

5.4.2 The Council will, as per the Gambling Commission's Guidance, specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to, for example, ensure that under 18 year olds do not have access to the premises (it is an offence for those under 18 to bet).

5.4.3 Other appropriate measures to meet the licensing objectives may cover (but are not limited to) issues such as:

- The size of the premises
- The number of counter positions available for person-to-person transactions
- Proof of age schemes
- CCTV
- Supervision of entrances and machine areas
- Physical separation of areas
- Location of entry
- Notices/signage

- Specific opening hours
- Self-barring schemes
- Provision of information leaflets/helpline numbers for organisations such as GamCare and self-exclusion forms in both prominent and discreet areas of the premises
- ATMs and cash terminals located separately from gaming machines and displaying GamCare Helpline information

5.4.4 Appendix C provides a Summary of Machine Provisions by Premises.

## 5.5 Tracks

5.5.1 The Council is aware that tracks may be subject to one or more than one premises licence, provided each licence relates to a specified area of the track. As per the Gambling Commission's Guidance, the Council will especially consider the impact upon two of the licensing objectives (i.e. gambling is open and fair, and protection of children and vulnerable persons from being harmed or exploited by gambling) and that children are excluded from gambling areas where they are not permitted to enter.

5.5.2 The Council will therefore expect the premises licence applicant to demonstrate suitable measures to ensure that children do not have access to adult only gaming facilities. It is noted that children and young persons will be permitted to enter track areas where facilities for betting are provided on days when dog racing and/or horse racing takes place, but that they are still prevented from entering areas where gaming machines (other than category D machines) are provided.

5.5.3 The Council may consider measures to meet the licensing objectives, such as:

- Proof of age schemes
- CCTV
- Supervision of entrances/machine areas
- Physical separation of areas
- Location of entry
- Notices/signage
- Specific opening hours
- Self-exclusion schemes
- Provision of information leaflets/helpline numbers for organisations such as GamCare

5.5.4 The list is not mandatory, nor exhaustive, and is merely indicative of example measures.

## **5.6 Gaming Machines**

5.6.1 Where the applicant holds a pool betting operating licence and is going to use the entitlement to four gaming machines, machines (other than Category D machines) should be located in areas from which children are excluded.

## **5.7 Betting Machines:**

5.7.1 The Council will take into account the size of the premises and the ability of staff to monitor the use of machines by children and young persons (it is an offence for those under 18 to bet) or by vulnerable people, when considering the number/nature/circumstances of betting machines an operator wants to offer.

## **5.8 Travelling Fairs**

5.8.1 This Council is responsible for deciding whether, where category D machines and/or equal chance prize gaming without a permit is to be made available for use at travelling fairs, the statutory requirement that the facilities for gambling amount to no more than an ancillary amusement at the fair is met.

5.8.2 The Council will also consider whether the applicant falls within the statutory definition of a travelling fair contained in Section 286 of the Gambling Act 2005.

5.8.3 The Council notes that the 27-day statutory maximum for the land being used as a fair, is per calendar year, and that it applies to the piece of land on which the fairs are held, regardless of whether it is the same or different travelling fairs occupying the land. The Council will work with its neighbouring authorities to ensure that land, which crosses our boundaries, is monitored so that the statutory limits are not exceeded.

## **5.9 Applications and Plans**

5.9.1 The Gambling Act requires applicants to submit plans of the premises with their application, in order to ensure that the Council has the necessary information to make an informed judgement about whether the premises are fit for gambling. They will also be used for the Council to plan future premises inspection activity.

5.9.2 Specifically, the Council endorses the requirements of the Gambling Act 2005 (Premises Licences and Provisional Statements) Regulation 2007 (as amended) which states that a plan must show:

- the extent of the boundary or perimeter of the premises
- where the premises include, or consist of, one or more buildings, the location of any external or internal walls of each such building



- where the premises form part of a building, the location of any external or internal walls of the building which are included in the premises
- where the premises are a vessel or a part of a vessel, the location of any part of the sides of the vessel, and of any internal walls of the vessel, which are included in the premises
- the location of each point of entry to and exit from the premises, including in each case a description of the place from which entry is made or to which the exit leads.

5.9.2 Plans for race tracks should be drawn to scale sufficiently detailed to include the information required by regulations.

5.9.3 The Council appreciates that it is sometimes difficult to define the precise location of betting areas on tracks. The precise location of where betting facilities are provided is not required to be shown on track plans, both by virtue of the fact that betting is permitted anywhere on the premises and because of the difficulties associated with pinpointing exact locations for some types of track. Applicants should provide sufficient information that this Council can satisfy itself that the plan indicates the main areas where betting might take place.

## **6. Provisional statements**

### **6.1 Provisional Statements**

6.1.1 Developers may wish to apply to this Council for provisional statements before entering into a contract to buy or lease property or land to judge whether a development is worth taking forward in light of the need to obtain a premises licence. There is no need for the applicant to hold an operating licence in order to apply for a provisional statement.

6.1.2 Section 204 of the Gambling Act provides for a person to make an application to the Council for a provisional statement in respect of premises that he or she:

- expects to be constructed;
- expects to be altered; or,
- expects to acquire a right to occupy.

6.1.3 The process for considering an application for a provisional statement is the same as that for a premises licence application. The applicant is obliged to give notice of the application in the same way as applying for a premises licence. Responsible authorities and interested parties may make representations and there are rights of appeal.

6.1.4 In contrast to the premises licence application, the applicant does not have to hold or have applied for an operating licence from the Gambling Commission

(except in the case of a track) and they do not have to have a right to occupy the premises in respect of which their provisional application is made.

6.1.5 The holder of a provisional statement may then apply for a premises licence once the premises are constructed, altered or acquired. The Council will be constrained in the matters it can consider when determining the premises licence application, and in terms of representations about premises licence applications that follow the grant of a provisional statement, no further representations from relevant authorities or interested parties can be taken into account unless:

- they concern matters which could not have been addressed at the provisional statement stage; or,
- they reflect a change in the applicant's circumstances.

6.1.6 In addition, the Council may refuse the premises licence (or grant it on terms different to those attached to the provisional statement) only by reference to matters:

- which could not have been raised by objectors at the provisional statement stage;
- which in the Council's opinion reflect a change in the operator's circumstances; or
- where the premises has not been constructed in accordance with the plan submitted with the application. This must be a substantial change to the plan and this Council notes that it can discuss any concerns it has with the applicant before making a decision.

## **7. Permits/Temporary and Occasional Use Notices**

A table setting out gaming machine entitlement is attached at Appendix C.

### **7.1 Unlicensed Family Entertainment Centre Gaming Machine Permits**

7.1.1 Where a premises does not hold a Premises Licence but wishes to provide category D gaming machines, it may apply to the Council for this permit.

7.1.2 It should be noted that the applicant must show that the premises will be wholly or mainly used for making gaming machines available for use and would, therefore, exclude any premises primarily used for any other purposes, e.g. canteens, fast food takeaways, leisure centres, garages and petrol filling stations, taxi offices.

7.1.3 An application for a permit may be granted only if the Council is satisfied that the premises will be used as an unlicensed Family Entertainment Centre and the Chief Officer of Police has been consulted on the application.

7.1.4 The Council will expect the applicant to show that there are policies and procedures in place to protect children from harm. Harm in this context is not limited to harm from gambling but includes wider child protection

considerations. The efficiency of such policies and procedures will each be considered on their merits. However, they may include appropriate measures/training for staff as regards suspected truant school children on the premises, measures/training covering how staff would deal with unsupervised very young children being on the premises, or children causing perceived problems on/around the premises. The applicant for a Family Entertainment Centre should provide evidence that a suitable criminal record check has been conducted on all staff in his/her employment.

7.1.5 This Council will also expect, as per Gambling Commission Guidance, that applicants demonstrate:

- A full understanding of the maximum stakes and prizes of the gambling that is permissible in unlicensed Family Entertainment Centres;
- That the applicant has no relevant convictions (those that are set out in Schedule 7 of the Act); and,
- That staff are trained to have a full understanding of the maximum stakes and prizes.

7.1.6 It should be noted that the Council cannot attach conditions to this type of permit.

## **7.2 (Alcohol) Licensed Premises Gaming Machine Permits**

7.2.1 There is provision in the Act for premises licensed to sell alcohol for consumption on the premises, to automatically have 2 gaming machines of categories C and/or D. The premises merely need to notify the licensing authority.

7.2.2 The Council may remove the automatic authorisation in respect of any particular premises if:

- Provision of the machines is not reasonably consistent with the pursuit of the Licensing Objectives.
- Gaming has taken place on the premises that breaches a condition of section 282 of the Gambling Act.
- The premises are mainly used for gaming.
- An offence under the Gambling Act has been committed on the premises.

7.2.3 If a premises wishes to have more than 2 machines, then it needs to apply for a permit and the Council must consider that application based upon:

- The Licensing Objectives.
- Guidance issued by the Commission.
- Such matters as they think relevant.

7.2.4 The Council considers that 'such matters' will be decided on a case-by-case basis but generally the Council will expect the applicant to ensure that there are sufficient measures to protect children and vulnerable persons from being harmed or exploited by gambling, including:

- That under 18-year-olds do not have access to the adult-only gaming machines
- That adult machines are in sight of the bar, or in the sight of staff
- The provision of information leaflets/helpline numbers for organisations such as GamCare and self-exclusion forms in both prominent and discreet areas of the premises
- ATMs and cash terminals located separately from gaming machines and displaying GamCare Helpline information

7.2.5 The Council may decide to grant the application with a smaller number of machines and/or a different category of machines than that applied for. Conditions (other than these) cannot be attached.

7.2.6 The holder of a permit must comply with any Code of Practice issued by the Gambling Commission, under Section 24 to the Gambling Act 2005, about the location and operation of the machine.

### **7.3 Prize Gaming Permits**

7.3.1 The Council has the right to prepare a 'Statement of Principles' that it proposes to apply in exercising its functions under Schedule 14 of the Act which may, in particular, specify matters that this authority propose to consider in determining the suitability of the applicant for a permit.

7.3.2 The applicant should set out the types of gaming that he or she is intending to offer and that the applicant should be able to demonstrate:

- That they understand the limits to stakes and prizes that are set out in Regulations;
- And that the gaming offered is within the law; and,
- Clear policies that outline the steps to be taken to protect children from harm.

7.3.3 In making its decision on an application for this permit the licensing authority does not need to have regard to the licensing objectives but must have regard to any Gambling Commission guidance.

7.3.4 It should be noted that there are conditions in the Gambling Act 2005 by which the permit holder must comply, but that the licensing authority cannot attach conditions. The conditions in the Act are:

- The limits on participation fees, as set out in regulations, must be complied with;
- All chances to participate in the gaming must be allocated on the premises on which the gaming is taking place and on one day; the game must be played and completed on the day the chances are allocated; and the result of the game must be made public in the premises on the day that it is played;

- The prize for which the game is played must not exceed the amount set out in regulations (if a money prize), or the prescribed value (if non-monetary prize); and
- Participation in the gaming must not entitle the player to take part in any other gambling.

#### **7.4 Club Gaming and Club Machines Permits**

7.4.1 Members Clubs and Miners' Welfare Institutes (but not Commercial Clubs) may apply for a Club Gaming Permit or a Club Gaming Machines Permit. The Club Gaming Permit will enable the premises to provide gaming machines (3 machines of categories B, C or D), equal chance gaming and games of chance. Members Clubs and Miners' Institutes and also Commercial Clubs may apply for a Club Machine Permit. A Club Gaming Machine Permit will enable the premises to provide gaming machines (3 machines of categories B, C or D). Commercial Clubs may not site category B3A gaming machines offering lottery games in their club.

7.4.2 The Council has to satisfy itself that the club meets the requirements of the Act to obtain a club gaming permit. In doing so it will take into account a number of matters as outlined in the Gambling Commission's Guidance. These include the constitution of the club, the frequency of gaming, and ensuring that there are at least 25 members.

7.4.3 The club must be conducted "wholly or mainly" for purposes other than gaming, unless the gaming is permitted by separate regulations. The Secretary of State has made regulations and these cover bridge and whist clubs.

7.4.4 The Council may only refuse an application on the grounds that:

- The applicant does not fulfil the requirements for a members' or commercial club or miners' welfare institute and therefore is not entitled to receive the type of permit for which it has applied;
- The applicant's premises are used wholly or mainly by children and/or young persons;
- An offence under the Act or a breach of a permit has been committed by the applicant while providing gaming facilities;
- A permit held by the applicant has been cancelled in the previous ten years; or,
- An objection has been lodged by the Commission or the police.

7.4.5 There is also a 'fast-track' procedure available under the Act for premises which hold a Club Premises Certificate under the Licensing Act 2003 (Schedule 12 paragraph 10). Commercial clubs cannot hold Club Premises Certificates under the Licensing Act 2003 and so cannot use the fast-track procedure. As the Gambling Commission's Guidance for local authorities states: "Under the fast-track procedure there is no opportunity for objections

to be made by the Commission or the police, and the grounds upon which an authority can refuse a permit are reduced." and "The grounds on which an application under the process may be refused are:

- That the club is established primarily for gaming, other than gaming prescribed under schedule 12;
- That in addition to the prescribed gaming, the applicant provides facilities for other gaming; or,
- That a club gaming permit or club machine permit issued to the applicant in the last ten years has been cancelled."

7.4.6 There are statutory conditions on club gaming permits that no child uses a category B or C machine on the premises and that the holder complies with any relevant provision of a code of practice about the location and operation of gaming machines.

## 7.5 Temporary Use Notices

7.5.1 Temporary Use Notices allow the use of premises for gambling where there is no premises licence but where a gambling operator wishes to use the premises temporarily for providing facilities for gambling. Premises that might be suitable for a Temporary Use Notice, according to the Gambling Commission, would include hotels, conference centres and sporting venues.

7.5.2 The Council can only grant a Temporary Use Notice to a person or company holding a relevant operating licence, i.e. a non-remote casino operating licence.

7.5.3 The Secretary of State has the power to determine what form of gambling can be authorised by Temporary Use Notices, and at the time of writing this Statement, the relevant regulations (S1 no. 3157: The Gambling Act 2005 (Temporary Use Notices) Regulations 2007) state that Temporary Use Notices can only be used to permit the provision of facilities or equal chance gaming, where the gaming is intended to produce a single winner, which in practice means poker tournaments.

7.5.4 There are a number of statutory limits as regards temporary use notices. The meaning of "premises" in part 8 of the Act is discussed in Part 7 of the Gambling Commission Guidance. As with "premises", the definition of "a set of premises" will be a question of fact in the particular circumstances of each notice that is given. In the Act "premises" is defined as including "any place". In considering whether a place falls within the definition of "a set of premises", the Council needs to look at, amongst other things, the ownership/occupation and control of the premises.

7.5.5 This Council expects to object to notices where it appears that their effect would be to permit regular gambling in a place that could be described as one set of premises; as recommended by the Gambling Commission's Guidance to licensing authorities.

## 7.6 Occasional Use Notices

7.6.1 The Council has very little discretion as regards these notices aside from ensuring that the statutory limit of 8 days in a calendar year is not exceeded. The Council will though consider the definition of a 'track' and whether the applicant is permitted to avail him/herself of the notice.

## 8. Small Society Lotteries

8.1 The Council will adopt a risk-based approach towards its enforcement responsibilities for small society lotteries. The Council considers that the following list, although not exclusive, could affect the risk status of the operator:

- submission of late returns (returns must be submitted no later than three months after the date on which the lottery draw was held).
- submission of incomplete or incorrect returns.
- breaches of the limits for small society lotteries.

8.2 Non-commercial gaming is permitted if it takes place at a non-commercial event, either as an incidental or principal activity at the event. Events are non-commercial if no part of the proceeds is for private profit or gain. The proceeds of such events may benefit one or more individuals if the activity is organised:

- by, or on behalf of, a charity or for charitable purposes.
- to enable participation in, or support of, sporting, athletic or cultural activities.

## 9. Further Information

9.1 Further information about the Gambling Act 2005, this Statement of Principles, the application process and related matters can be obtained from [licensing@enfield.gov.uk](mailto:licensing@enfield.gov.uk). Or [www.enfield.gov.uk](http://www.enfield.gov.uk).

Information is also available from:

The Gambling Commission  
4<sup>th</sup> Floor  
Victoria Square House  
Birmingham  
B2 4BP  
Telephone: 0121 230 6666  
Website: [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)

The Department for Culture, Media and Sport  
100 Parliament Street  
London  
SW1A 2BQ  
Email: [enquiries@dcms.gov.uk](mailto:enquiries@dcms.gov.uk)

Website: [www.gov.uk/government/organisations/department-for-digital-culture-media-sport](http://www.gov.uk/government/organisations/department-for-digital-culture-media-sport)



## Appendix A Definitions

**NOTE:** In this Policy, the following definitions are included to provide an explanation to certain terms included in the Act and, therefore, in the Statement of Licensing Policy. In some cases, they are an abbreviation of what is stated in the Gambling Act 2005 or an interpretation of those terms. For a full definition of the terms used, the reader must refer to the Gambling Act 2005.

‘The Council’ means London Borough of Enfield Council, acting as the Licensing Authority as defined by the Gambling Act 2005.

‘The Act’ means the Gambling Act 2005.

‘The Licensing Authority’ the authority in whose area the premises is wholly/partly situated. The Licensing Authority (as in the issuing authority) is also a responsible authority.

‘The Gambling Commission’ a body set up by the Government as the unified regulator for gambling, replacing the Gaming Board.

‘Responsible Authority’ means a public body that must be notified of certain applications for premises licences and permits and are entitled to make representations on any of the licensing objectives.

‘Children’ means individuals who are less than 16 years old.

‘Young person’ means individuals who are aged less than 18 years old and 16 years and over.

‘Mandatory Conditions’ means a specified condition provided by regulations to be attached to premises licences.

‘Default Conditions’ means a specified condition provided for by regulations to be attached to a licence unless excluded by the Council.

‘Premises’ means any place, including a vessel or moveable structure.

‘Vulnerable person’ means (Public Health):

- children, adolescents and young adults (including students)
- people with mental health issues, including those experiencing substance abuse issues (problem gambling is often ‘co-morbid’ with these substance addictions)
- individuals from certain minority ethnic groups, such as Asian/Asian British, Black/ Black British and Chinese/other ethnicity
- the unemployed
- the homeless
- those with low intellectual functioning
- problem gamblers seeking treatment
- people with financially constrained circumstances
- those living in deprived areas.

## **Appendix B Access to Premises**

### **Casinos**

- The principal entrance to the premises must be from a 'street';
- No entrance to a casino must be from premises that are used wholly or mainly by children and/or young persons;
- No customer must be able to enter a casino directly from any other premises which holds a gambling premises licence.

### **Adult Gaming Centre**

- No customer must be able to access the premises directly from any other licensed gambling premises.

### **Betting Shops**

- Access must be from a 'street' or from other premises with a betting premises licence;
- No direct access from a betting shop to another premises used for the retail sale of merchandise or services. In effect there cannot be an entrance to a betting shop from a shop of any kind unless that shop is itself a licensed betting premises (for example, you could not have a betting shop at the back of a café – the whole area would have to be licensed.)

### **Tracks**

No customer should be able to access the premises directly from:

- a casino;
- an adult gaming centre.

### **Bingo Premises**

No customer must be able to access the premises directly from:

- a casino;
- an adult gaming centre;
- a betting premises, other than a track.

### **Family Entertainment Centre**

No customer must be able to access the premises directly from:

- a casino;
- an adult gaming centre;
- a betting premises, other than a track.

Section 7 of the Gambling Commission's Guidance to Licensing Authorities contains further guidance on this issue, which this authority will also take into account in its decision-making.

## Appendix C: Summary of Machine Provisions by Premises

Premises type	Machine category						
	A	B1	B2	B3	B4	C	D
Large casino (machine/table ratio of 5-1 up to maximum)		Maximum of 150 machines Any combination of machines in categories B to D (except B3A machines), within the total limit of 150 (subject to machine/table ratio)					
Small casino (machine/table ratio of 2-1 up to maximum)		Maximum of 80 machines Any combination of machines in categories B to D (except B3A machines), within the total limit of 80 (subject to machine/table ratio)					
Pre-2005 Act casino (no machine/table ratio)		Maximum of 20 machines categories B to D (except B3A machines), or any number of C or D machines instead					
Betting premises and tracks occupied by pool betting		Maximum of 4 machines categories B2 to D (except B3A machines)					
Bingo premises <sup>1</sup>				Maximum of 20% of the total number of gaming machines which are available for use on the premises categories B3 or B4		No limit on category C or D machines	
Adult gaming centre <sup>2</sup>				Maximum of 20% of the total number of gaming machines which are available for use on the premises categories B3 or B4		No limit on category C or D machines	
Licensed family entertainment centre <sup>3</sup>						No limit on category C or D machines	
Family entertainment centre (with permit) <sup>3</sup>						No limit on category D machines	
Clubs or miners' welfare institute (with permits) <sup>4</sup>				Maximum of 3 machines in categories B3A or B4 to D			
Qualifying alcohol-licensed premises					1 or 2 machines of category C or D automatic upon notification		
Qualifying alcohol-licensed premises (with licensed premises gaming machine permit)					Number of category C-D machines as specified on permit		
Travelling fair						No limit on category D machines	

<sup>1</sup>Bingo premises licence are entitled to make available for use a number of category B gaming machines not exceeding 20% of the total number of gaming machines on the premises. Where a premises licence was granted before 13 July 2011, they are entitled to make available eight<sup>104</sup> category B gaming machines, or 20% of the total number of gaming machines, whichever is the greater. Category B machines at bingo premises are restricted to sub-category B3 and B4 machines, but not B3A machines.

<sup>2</sup> Adult gaming centres are entitled to make available for use a number of category B gaming machines not exceeding 20% of the total number of gaming machines which are available for use on the premises and any number of category C or D machines. Where a premises licence was granted before 13 July 2011, they are entitled to make available four category B gaming machines, or 20% of the total number of gaming machines, whichever is the greater. Category B machines at adult gaming centres are restricted to sub-category B3 and B4 machines, but not B3A machines.

<sup>104</sup> The Gambling Act 2005 (Gaming Machines in Bingo Premises) Order 2009

## Appendix D: Schedule of Delegation of Licensing Functions and Decisions

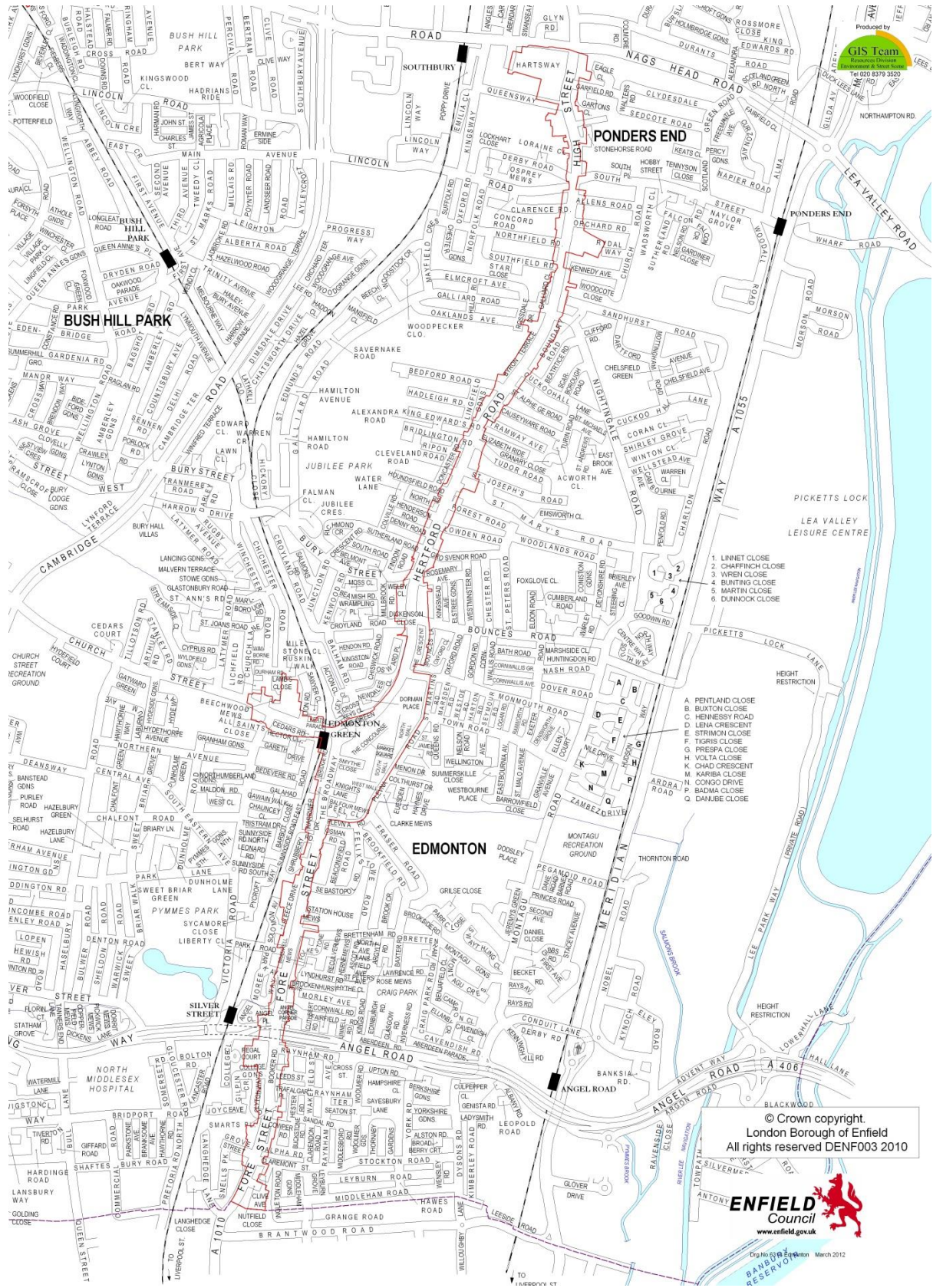
Summary of licensing authority delegations permitted under the Gambling Act, applicable to England and Wales only

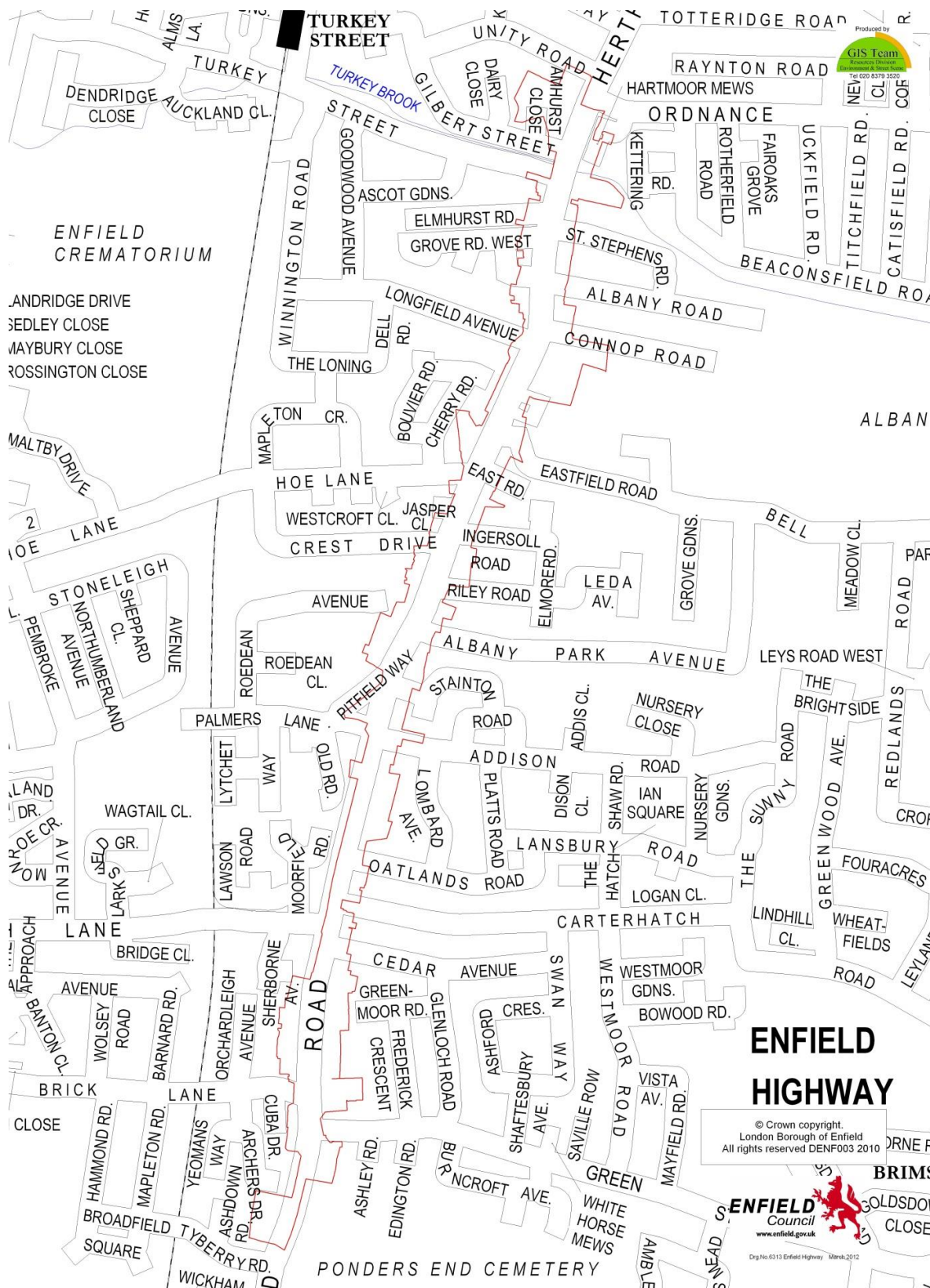
Matter to be dealt with	Full Council	Sub-committee of licensing committee	Officers
Final approval of the Licensing Authority Policy statement	X		
Changes to the Local Area Profile attached to this Policy		Full Licensing Committee	
Policy not to permit casinos	X		
Fee setting (when appropriate)		X (if delegated by full council)	
Application for premises licences		X Where representations have been received and not withdrawn	X Where no representations received/representations have been withdrawn
Application for a variation to a licence		X Where representations have been received and not withdrawn	X Where no representations received/representations have been withdrawn
Application for a transfer of a licence		X Where representations have been received from the Commission or responsible authority	X Where no representations received from the Commission or responsible authority
Application for a provisional statement		X Where representations have been received and not withdrawn	X Where no representations received/representations have been withdrawn
Review of a premises licence		X	
Application for club gaming/club machine permits		X Where objections have been made and not withdrawn	X Where no objections made/objections have been
Cancellation of club gaming/club machine permits		X	
Applications for other permits			X
Cancellation of licensed premises gaming machine permits			X
Consideration of temporary use notice			X
Decision to give a counter notice to a temporary use notice		X	

X indicates the lowest level

### **Appendix E: Enfield's Gambling Vulnerability Area**

The Enfield Gambling Vulnerability area has been outlined in line with data that reflects both vulnerabilities that are linked to gambling related harm by evidence and research and the denser location of gambling premises. The areas covered by this are contiguous with two existing Cumulative Impact Zones (Enfield Highway and Edmonton) and the maps below show the areas covered by the Gambling Vulnerability Area.





This page is intentionally left blank



## **1 Cumulative Impact Assessment for Enfield**

- 1.1 Enfield Council has undertaken an assessment of the four existing Cumulative Impact Zones (CIZs):
- Upper Edmonton
  - Enfield Highway
  - Enfield Town
  - Southgate
- 1.2 Enfield Council has also undertaken an assessment for two new CIZs:
- Bowes
  - Palmers Green
- 1.3 The assessment reviewed the evidence to support the continuation of CIZ's in the existing areas and the establishment of CIZ's in Bowes and Palmers Green. Enfield Council considers that the evidence does support the continuation and establishment of CIZs in the six areas outlined in 11.16 and 11.17 above. This evidence can be found in outlined in Annexes 2 – 7 of this policy.
- 1.4 The assessment was also put out to a public consultation, with particular engagement undertaken with key stakeholders. The consultation included the evidence outlined in Annexes 2 – 7. Key stakeholder engagement was overwhelmingly supportive of the four existing CIZs and the two new CIZs. All responses received from the public consultation were supportive of the four existing CIZs and the two new CIZs.
- 1.5 Enfield Council, as the Licensing Authority, believes that the appropriate evidence has been provided and the appropriate consultation undertaken to meet the necessary process for undertaking a Cumulative Impact Assessment as outlined in the Licensing Act 2003.

### ***Scope of the Cumulative Impact Zones***

- 1.6 Any applications for new premises licences and/or club premises certificates and/or provisional statements and any applications for variations of those authorisations for hours within the limits set out below (referred to as Core Hours) for premises and/or clubs inside the cumulative impact policy areas will generally be granted, subject to consideration of any representations about the way in which the application will promote the licensing objectives.
- 1.7 Any applications for new premises licences and/or club premises certificates and/or provisional statements and any applications for variations of those authorisations for hours outside the limits set out below (referred to as Core Hours) for premises and/or clubs inside the cumulative impact policy areas will, when subject to relevant representations, be subject to the presumption that the application will demonstrate how it will not add to the cumulative impact in the CIZ.
- 1.8 Core Hours:
- 1.8.1 Sale/supply of alcohol (off supplies only):

**Monday to Sunday 08:00 to 24:00**

1.8.2 Plays, Films, Indoor sporting events, Boxing or wrestling entertainments, Live music, Recorded music and/or Performance of dance:

**Monday to Sunday 09:00 to 24:00**

1.8.3 Sale/supply of alcohol (on supplies only or on & off supplies):

**Monday to Sunday 10:00 to 24:00**

1.8.4 Late night refreshment:

**Monday to Sunday 23:00 to 24:00**

1.8.5 New Year's Eve: Any premises or club that is licensed for both the on supply of alcohol and for regulated entertainment may remain open and provide their licensed activities from the end of licensed hours on New Year's Eve to the start of licensed hours on New Year's Day.

## **2 Introduction**

2.1 This paper outlines the data that has been used to assess the four existing Cumulative Impact Zones (CIZs) and for the two proposed CIZs.

## **3 Executive Summary**

3.1 The London Borough of Enfield has four Cumulative Impact Zones (CIZs) as outlined in the current Statement of Licensing Policy 2020 - 2025. The licensing authority considered that the number of premises licences in these zones was such that it was likely that granting further licences would be inconsistent with the authority's duty to promote the licensing objectives.

3.2 The London Borough of Enfield is currently considering establishing two additional Cumulative Impact Zones, in Bowes and Palmers Green wards.

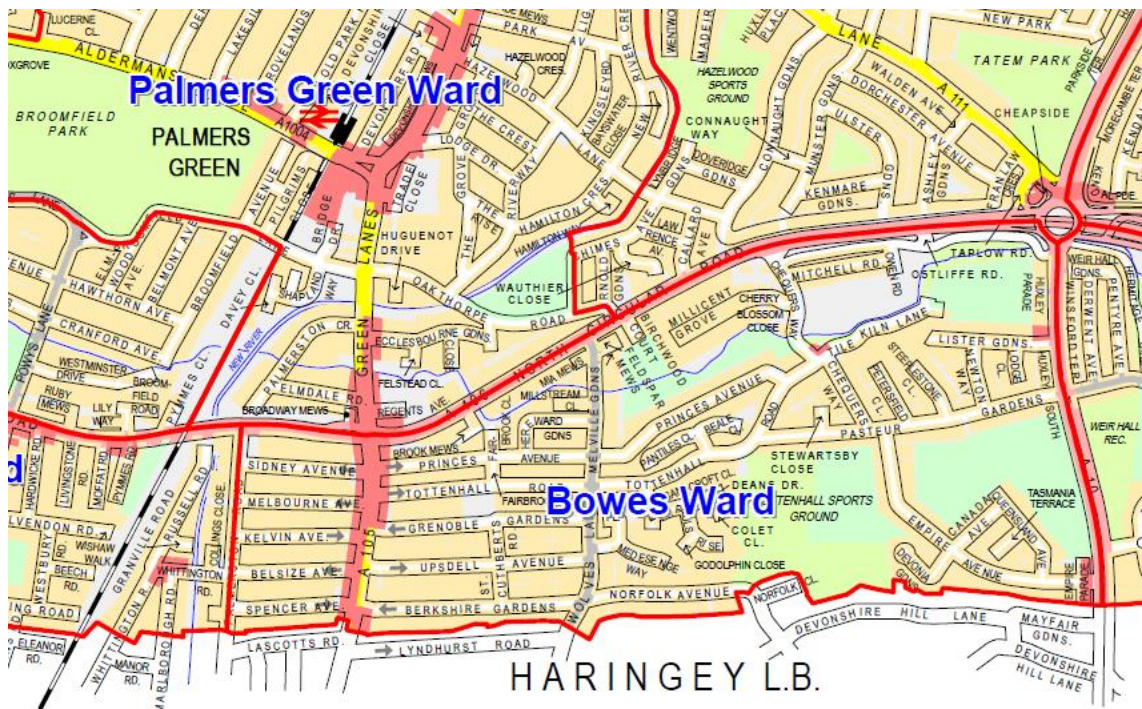
## **4 Cumulative Impact Assessment**

4.1 A Cumulative Impact Assessment (CIA) may be published by a licensing authority to help it to limit the number or types of licence applications granted in areas where there is evidence to show that the number or density of licensed premises in the area is having a cumulative impact and leading to problems which are undermining the licensing objectives. CIAs relate to applications for new premises licences, club premises certificates, applications to vary existing premises licences, club premises certificates in a specified area.

4.2 Where a Cumulative Impact Zone (CIZ) is adopted it creates a rebuttable presumption that licence applications for premises in the CIZ will be refused. Only in exceptional circumstances where an applicant can demonstrate that granting an application will not add to cumulative impact may a licence be granted.

## **5 Proposed additional Cumulative Impact Zones**

5.1 It is the view of the Licensing Authority and of a number of Responsible Authorities that the areas marked on the map below in Palmers Green and Bowes are demonstrated to have a sufficient level of cumulative impact (in terms of violence, public order and criminal damage) due to the sale, supply and consumption of alcohol that Cumulative Impact Zones should be established in these areas.



## 6 Evidence

6.1 There must be an evidential basis for the decision to publish a CIA. This has been provided by data sets used to assess location, volume and trajectory of crime and anti-social behaviour in the three CIZs, and this will also be provided through a public consultation.

### Data

6.2 In order to review the four existing CIZs (Upper Edmonton, Enfield Town, Enfield Highway and Southgate) we have used neighbourhood Police licensing and crime data sets for varying periods. The same data has been used to establish a case for the establishment of the two proposed new CIZs in Palmers Green and Bowes.

6.3 Data sets used are those most linked with cumulative impact and the licensed sector:

- All crime – to provide wider context;
- Violence against the person offences;

- Public Order offences; and,
- Criminal damage offences.

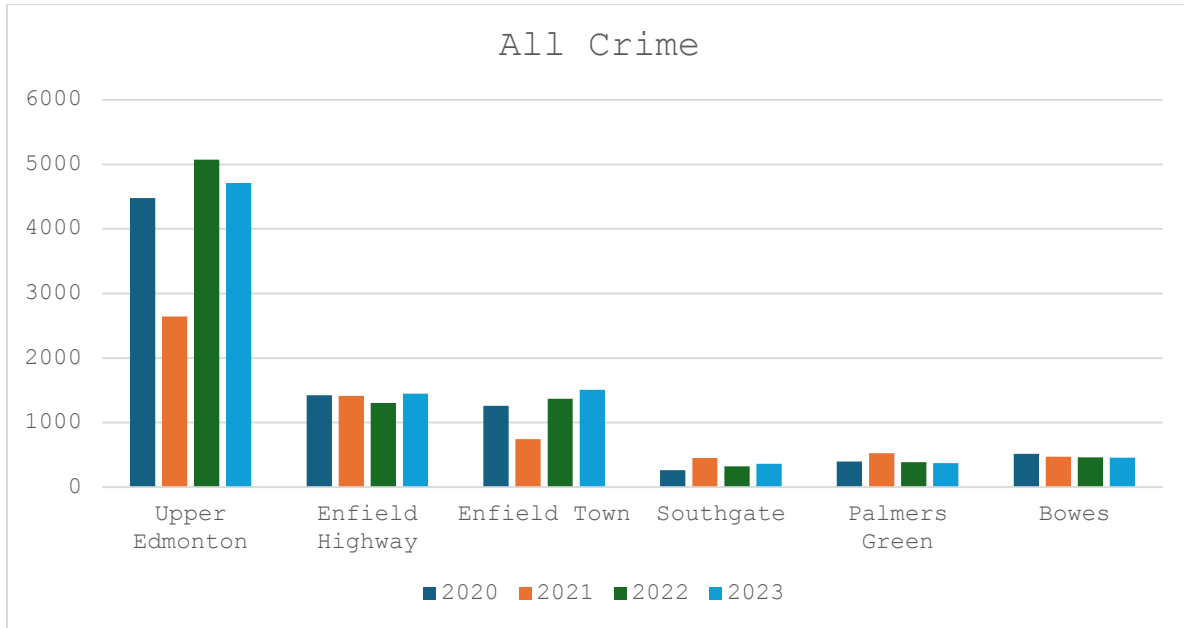
## 7 Data review

7.1 The data outlined below demonstrates the number and trajectory over time of the crime and anti-social behaviour reports in each of the existing and proposed CIZ areas. This aims to demonstrate the rationale and reasoning for these CIZs to be in place.

## 8 All Crime

8.1 As can be seen from the data below for all crime there is a relatively consistent trajectory over the four years included, with some fluctuation between years. The graph in particular outlines the three different levels of crime in the 6 areas. Upper Edmonton has the highest levels with Enfield Highway and Enfield Town at a middle level and Southgate and the two proposed areas (Palmer's Green and Bowes) at a lower, but still significant level.

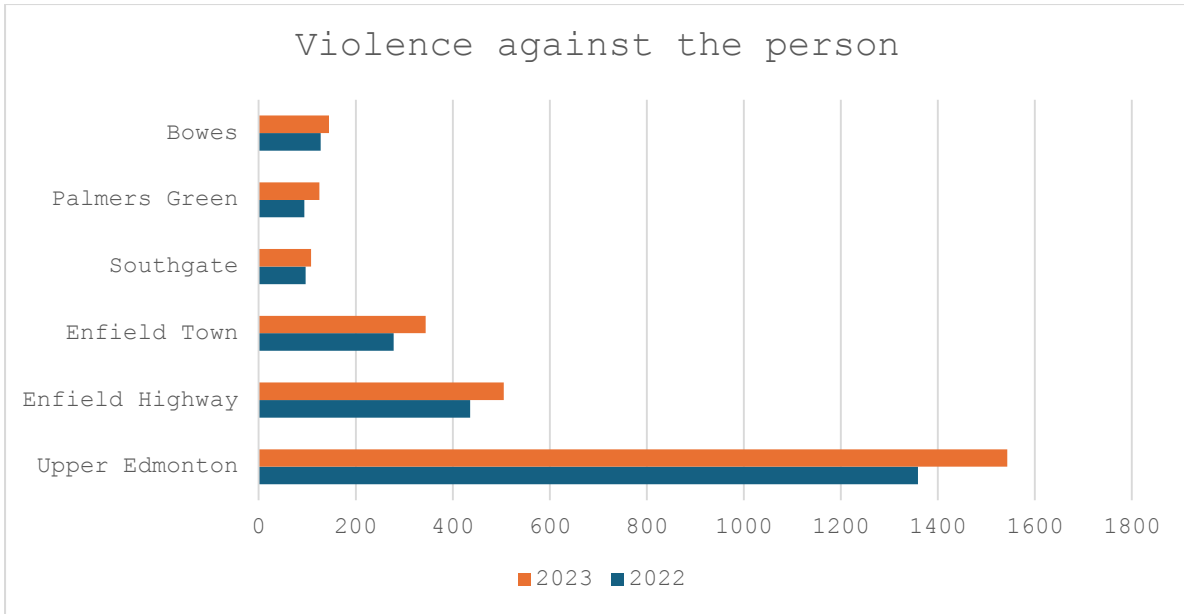
Area	2020	2021	2022	2023
<b>Current CIZ areas</b>				
Upper Edmonton	4477	2642	5071	4708
Enfield Highway	1426	1415	1307	1450
Enfield Town	1262	747	1368	1506
Southgate	265	452	323	365
<b>Proposed CIZ areas</b>				
Palmer's Green	398	526	390	372
Bowes	515	473	463	456



## 9 All violence against the person

9.1 It is noticeable from the below table and graph that violence against the person offences saw a slight increase in all 6 areas between 2022 and 2023. This shows a continued issue with violence in these areas.

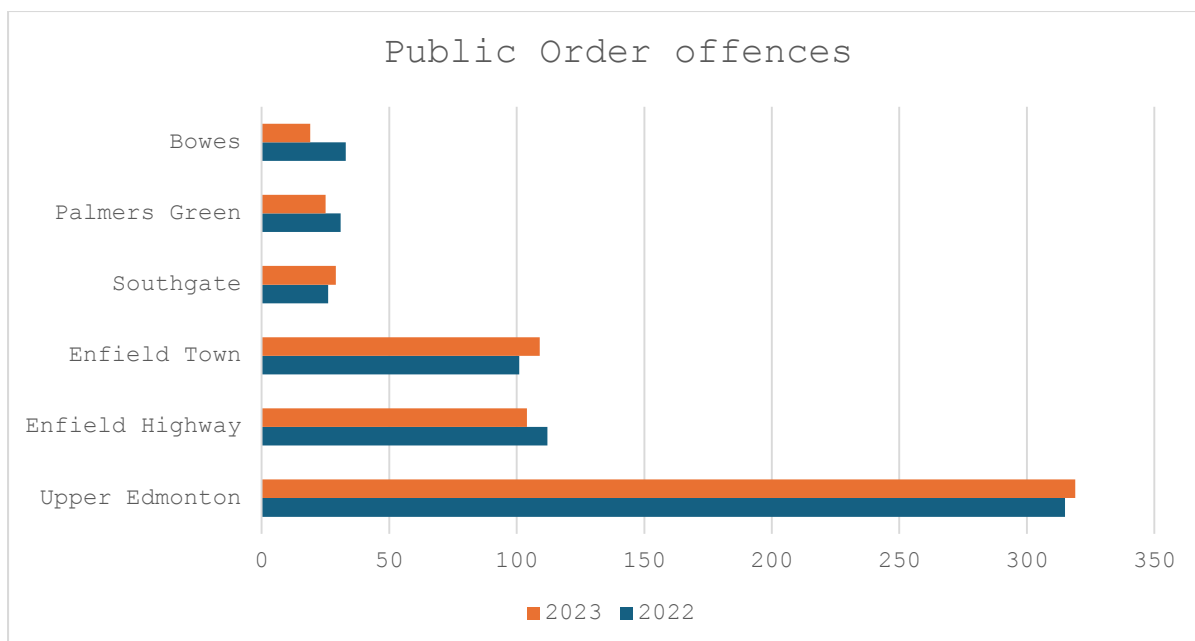
Area	2022	2023
<b>Current CIZ areas</b>		
Upper Edmonton	1359	1543
Enfield Highway	436	505
Enfield Town	278	344
Southgate	97	108
<b>Proposed CIZ areas</b>		
Palmers Green	94	125
Bowes	128	145



**10 All Public Order Offences**

10.1 The table and graph below show that the levels of public order offences have remained consistent between 2022 and 2023.

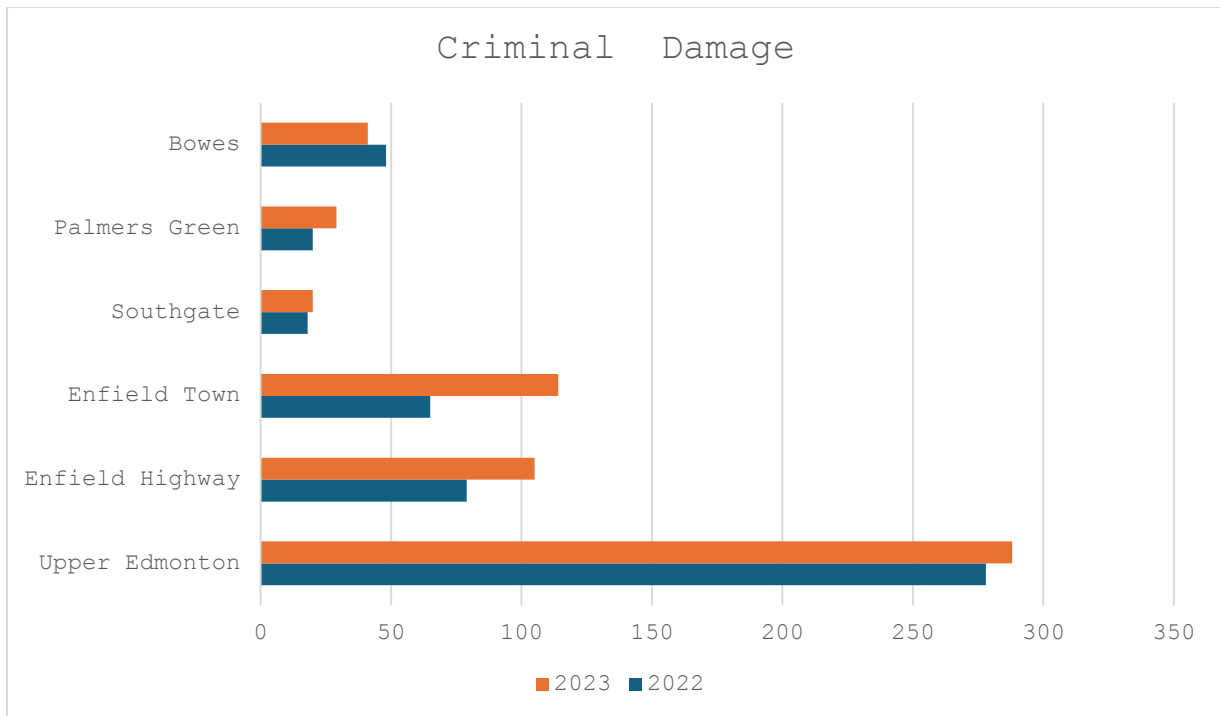
Area	2022	2023
<b>Current CIZ areas</b>		
Upper Edmonton	315	319
Enfield Highway	112	104
Enfield Town	101	109
Southgate	26	29
<b>Proposed CIZ areas</b>		
Palmers Green	31	25
Bowes	33	19



## 11 All criminal damage

11.1 The table and graph below show that criminal damage offences have seen an increase in most of the 6 areas.

Area	2022	2023
<b>Current CIZ areas</b>		
Upper Edmonton	278	288
Enfield Highway	79	105
Enfield Town	65	114
Southgate	18	20
<b>Proposed CIZ areas</b>		
Palmers Green	20	29
Bowes	48	41



## 12 Conclusion

### *Continuation of existing CIZs*

12.1 The data shows that the issues that the CIZs were established to address remain an ongoing concern for the Licensing Authority. In reviewing the data it is considered that the evidence supports the case for continuing CIZs in Upper Edmonton, Enfield Town, Enfield Highway and Southgate.

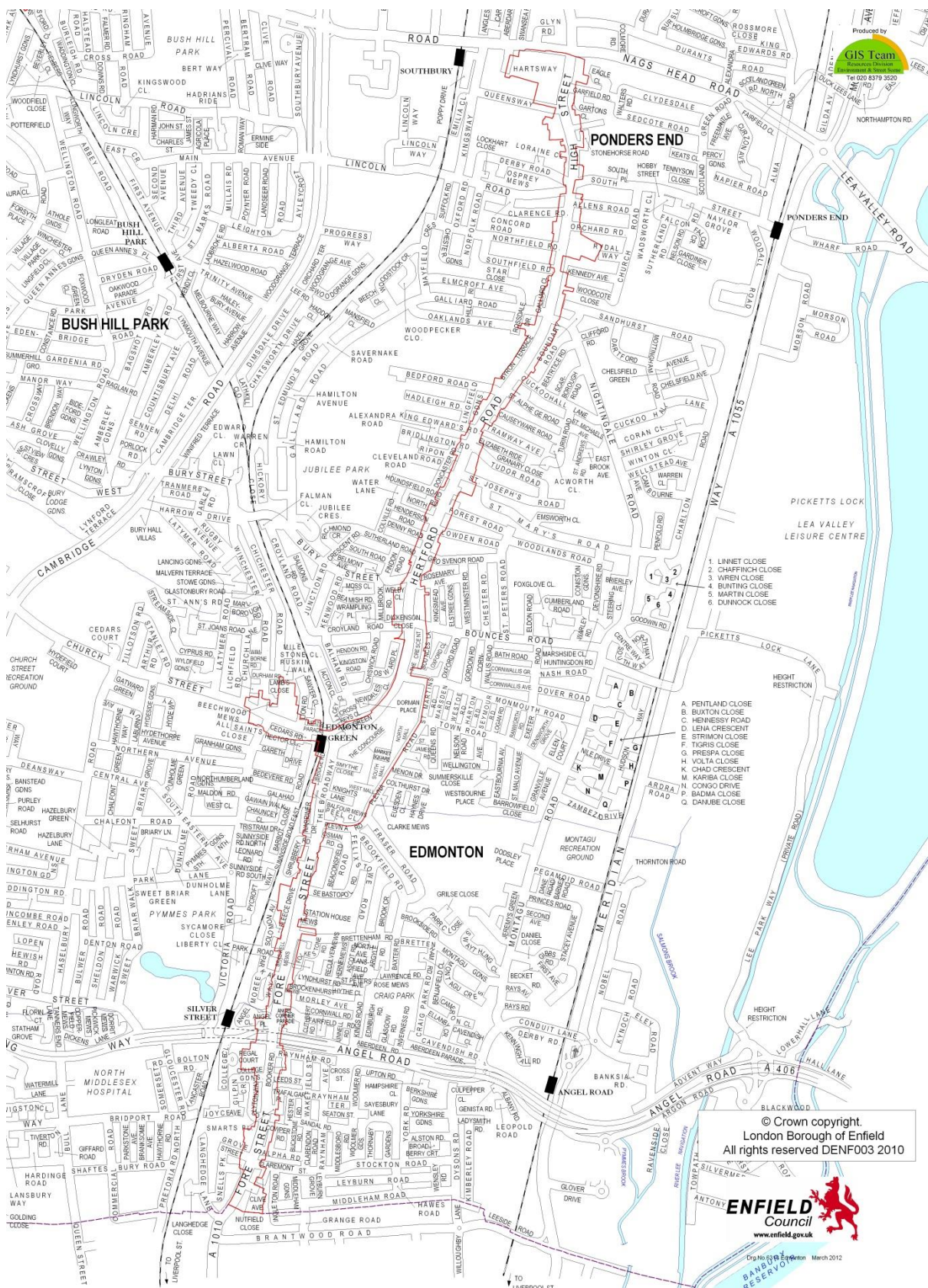
### *Establishment of new CIZs*

12.2 The data for the two proposed CIZs (Palmers Green and Bowes) is of a higher level than the existing CIZ area in Southgate and consistent trajectory. Both of these areas have been identified by the Licensing Authority and a number of Responsible Authorities (Police and Public Health in particular) as areas of concern in terms of licensing and crime and nuisance. In reviewing the data and key stakeholder views it is considered that the evidence supports the case for establishing CIZs in Palmers Green and Bowes.





**ANNEX 1 – THE EDMONTON CUMULATIVE IMPACT ZONE**

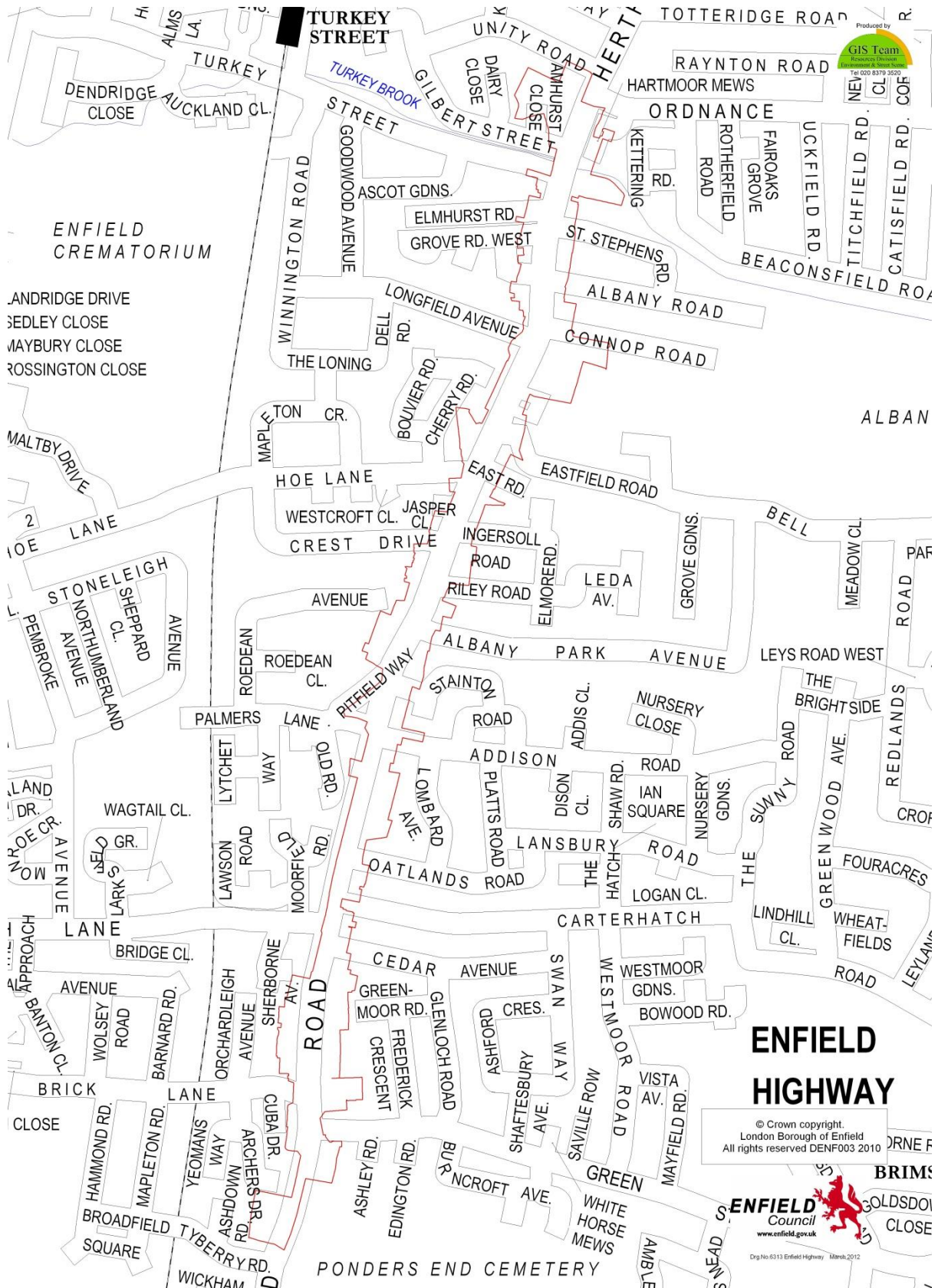


© Crown copyright.  
London Borough of Enfield  
All rights reserved DENF003 2010

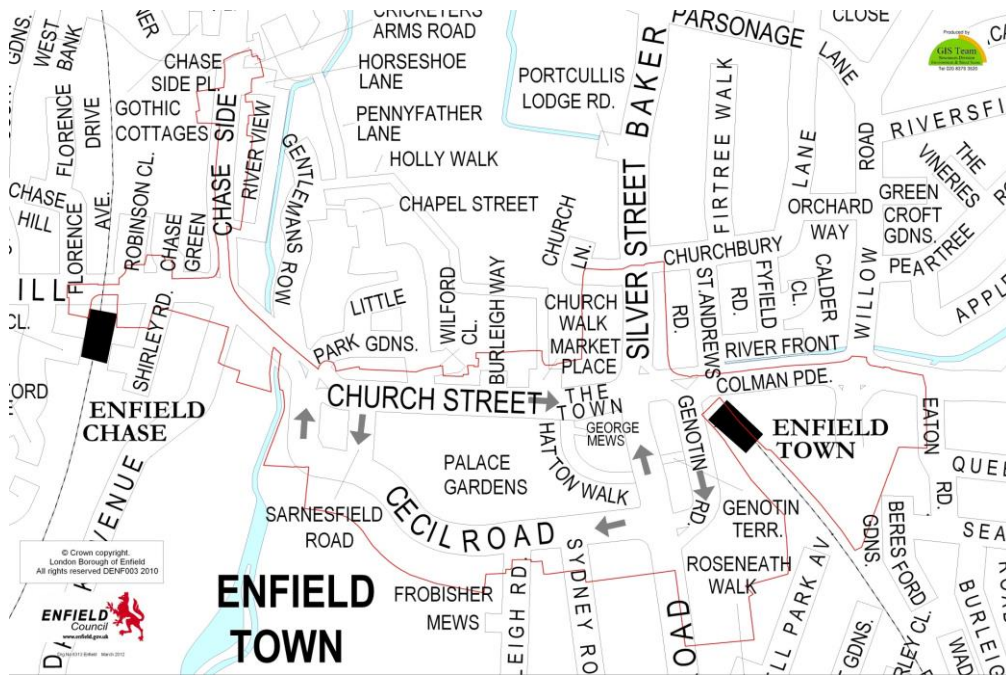


Urg No 639 Edmonton March 2012

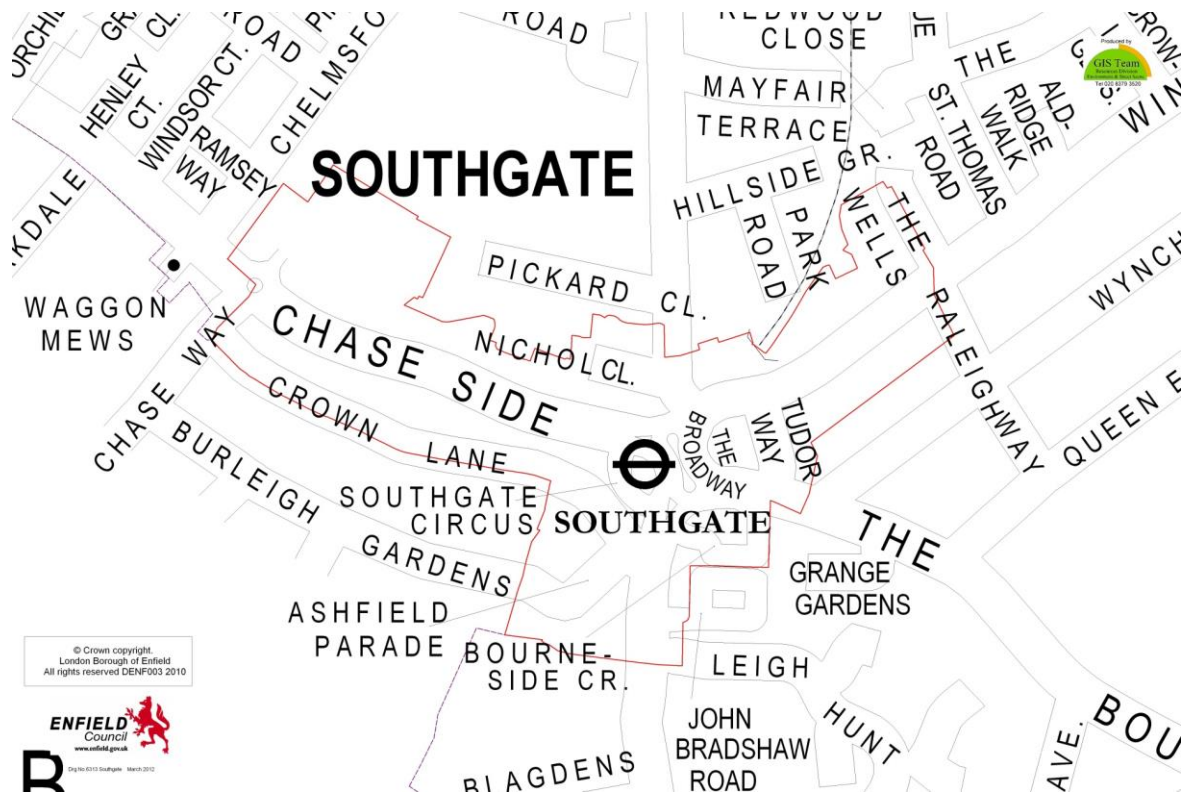
**ANNEX 2: THE ENFIELD HIGHWAY CUMULATIVE IMPACT ZONE**



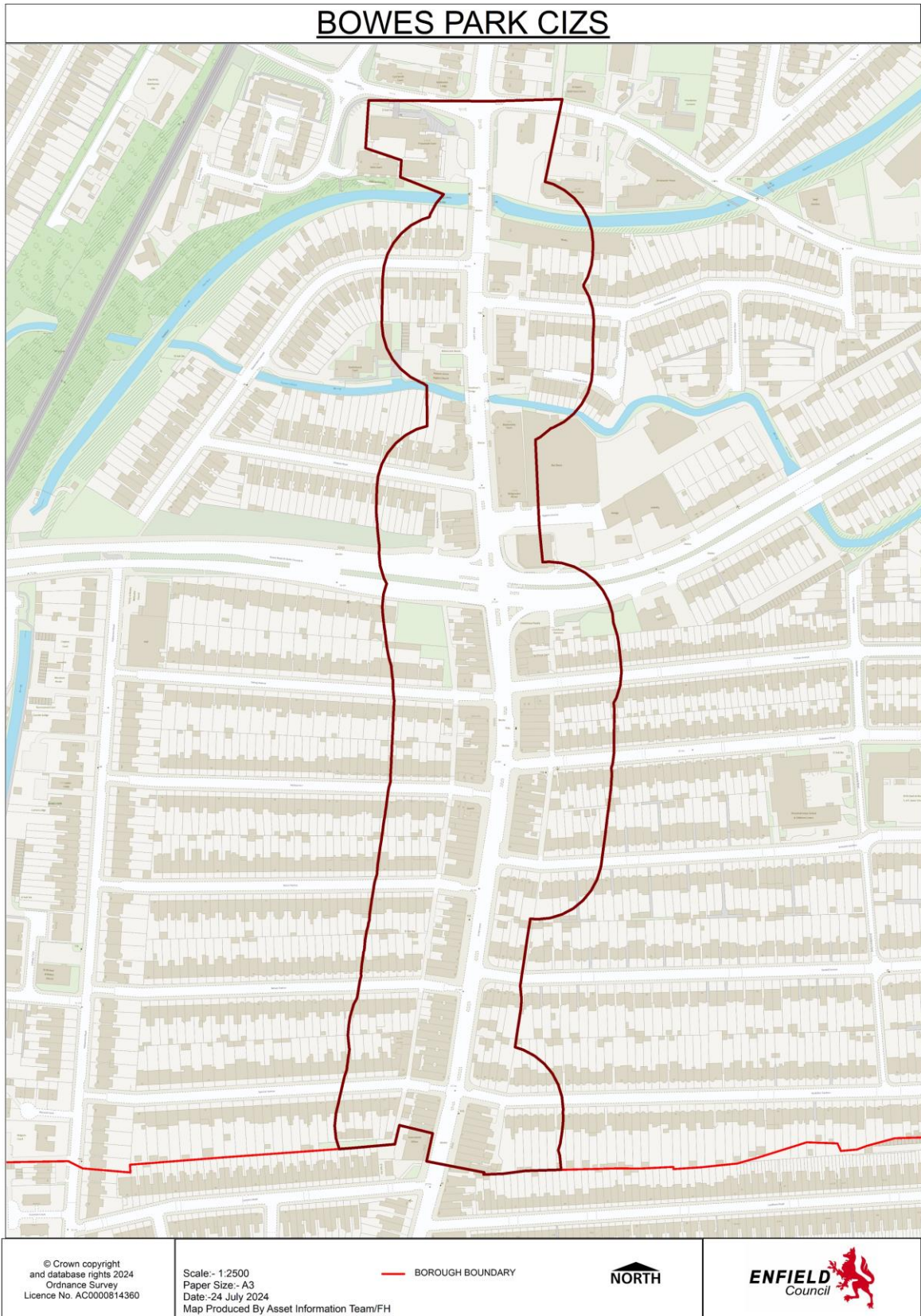
**ANNEX 3: THE ENFIELD TOWN CUMULATIVE IMPACT ZONE**



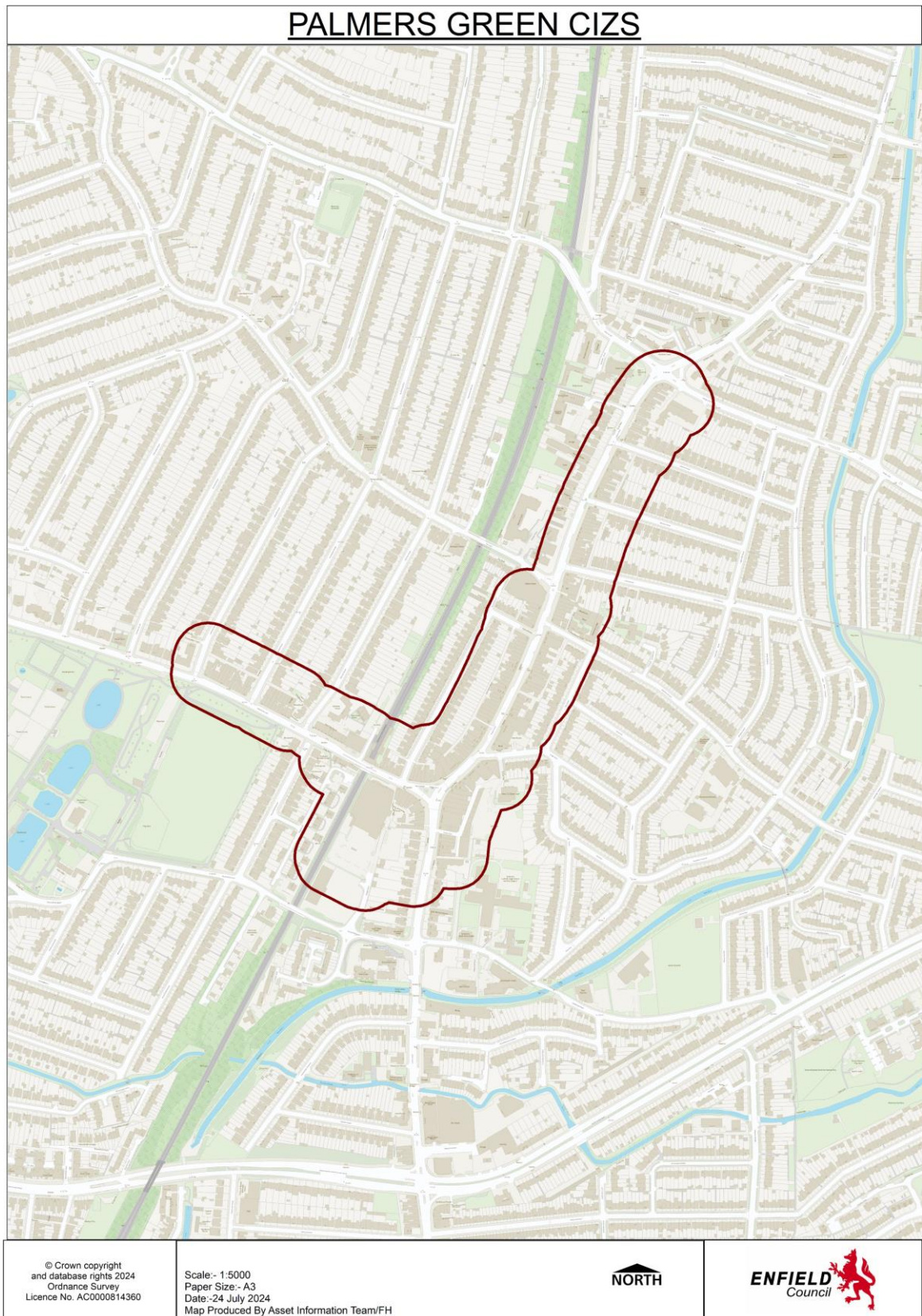
**ANNEX 4: THE SOUTHGATE CUMULATIVE IMPACT ZONE**



**ANNEX 5: BOWES CUMULATIVE IMPACT ZONE**



**ANNEX 6: PALMERS GREEN CUMULATIVE IMPACT ZONE**



This page is intentionally left blank



## Enfield Gambling Local Area Profile

### Introduction and Background

#### *Responsibilities under the Gambling Act 2005 and associated guidance*

The Council is the licensing authority under the Gambling Act 2005 (the Act) and is responsible for issuing premises licences and permits for gambling venues. When the Council exercises its functions in respect of gambling, it must have regard to the Act and its regulations, gambling codes of practice, the Council's Statement of Licensing Policy and the Gambling Commission's Guidance to Local Authorities (GLA).

The Act also requires the Council to 'aim to permit' gambling and therefore aim to issue premises licences if applications are reasonably consistent with the following licensing objectives:

- a) preventing gambling from being a source of crime and disorder, being associated with crime or disorder or being used to support crime
- b) ensuring that gambling is conducted in a fair and open way, and
- c) protecting children and other vulnerable persons from being harmed or exploited by gambling

In its GLA, the Gambling Commission recommends the approach the Council should take to gambling licensing and regulation. In September 2015, the Gambling Commission issued a revised GLA (5<sup>th</sup> edition) with many changes for licensing authorities that fall under three broad themes:

- increased focus on risk and regulation
- greater attention to local area risk, and
- encouraging partnership and collaboration between stakeholders to mitigate risk

In addition, changes to the Gambling Licence Conditions and Codes of Practice (LCCP) that took effect from 31 January 2024, require all industry operators to undertake local area risk assessments to identify the risks their gambling venues pose to the licensing objectives and to take into account the Council's Statement of Gambling Licensing Policy. Industry operators are also expected to provide these local risk assessments to the Council as part of any application.

#### *The Council's Local Area Profile*

To support the Council to give effect to these requirements and guidance the Council has produced a Local Area Profile (LAP). This LAP is intended to provide a clearer

understanding of the factors in the local area in Enfield and in terms of Enfield's population to provide gambling licence applicants and operators with a clearer understanding of the risks they will need to assess for when applying for and operating a gambling licence.

The Council's LAP will have a particular focus on matters relating to the licensing objectives for:

- preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- protecting children and other vulnerable persons from being harmed or exploited by gambling.

To achieve this the LAP outlines data that is relevant to risks to children and vulnerable people, economically vulnerable people and crime and disorder.

## **1.2 What is a gambling local area profile?**

A local area profile is an assessment of the key characteristics of Enfield in the context of gambling-related harm. The information obtained for the assessment helps to provide a better understanding of the types of people that are at risk of being vulnerable to gambling-related harm; where they are located and any current or emerging problems that may increase that risk. Our LAP will help us to develop our Statement of Licensing Policy and set out our expectations of operators of gambling premises.

## **1.3 Creating Enfield's local area profile**

Although there is no legal requirement on the Council to complete a local area profile, we feel there is significant benefit for operators, our residents, business, visitors to Enfield and the Council to have an evidence-based awareness of the potential and actual risks of vulnerability to gambling-related harm.

In this context we have completed an assessment of the key characteristics of Enfield to identify areas of higher risk of vulnerability to gambling-related harm. In developing our local area profile, we have had regard to the research produced on the impact of gambling on vulnerable and economically vulnerable populations and on crime and disorder.

## 1.4 Our approach

To better understand the risks to Enfield in relation to gambling the LAP is divided into three sections:

- Risks to young and vulnerable residents;
- Risks to economically vulnerable residents; and,
- Prevention of crime and disorder.

In each section a summary of the key risks will be outlined and maps showing different aspects of risk against location and density of gambling premises will be provided. How these risks are likely to influence gambling policy in Enfield will also be outlined.

### *Additional factors that exacerbate risks*

Three key factors that are identified in the academic research literature are exposure, proximity and density. These factors are particularly important in their impact on younger and more vulnerable people and in economically deprived areas.

In academic research literature identifies that opportunities to gamble tend to be higher in deprived areas (Evans and Cross, 2021 <https://www.abrdn.com/docs?editionId=c8d6f9b5-1c8b-4b97-9bb4-c3099938f737#:~:text=As%20of%20November%202020%2C%2021,in%20the%20least%20deprived%20decile.>). This is shown in the data and maps below for Enfield, with the highest concentrations of gambling premises being located in the most deprived areas of the borough, the areas which also have the highest levels of unemployment and households receiving Universal Credit. These premises also are shown to cluster in the most deprived areas, with higher density and proximity to the residents of these areas.

The research shows that proximity to higher density areas results in higher rates of gambling behaviours and harms suffered by residents. Residents living within 0.7 km of a gambling venue were twice as likely to be problem gamblers as those living more than 3.1 kms away (Pearce et al 2008). In particular younger people are affected by proximity and density, one study found that for 18-21 year olds the likelihood of developing gambling problems increased by 39% for every additional gambling premises in their local area (Welte et al 2009).

With the data and mapping below this research outlines a number of areas for concern. In particular that exposure, proximity, and density have a significant effect on the ability of operators and the Council to implement the objectives set out in the act.

## **Gambling licensing objectives**

### Impact of new gambling premises

Understanding the impact of new gambling licenses in Enfield and in specific areas within the borough is important to determining the most appropriate approach for the Statement of Principles for Gambling in Enfield.

In terms of the Gambling licensing objectives it is primarily two of them that are affected by the location of gambling premises in the local area. These are:

- preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- protecting children and other vulnerable persons from being harmed or exploited by gambling.

The third objective relates more to the operation and practice of the licensed premises. This is:

- ensuring that gambling is conducted in a fair and open way

As a Local Area Profile this document focuses primarily on the first two. With proximity, density and vulnerability being the focus for the protection of children and vulnerable persons from being harmed or exploited by gambling. And with patterns and density of crime and anti-social behaviour being the focus for being a source, associated with or supporting crime and disorder.

#### Protecting children and other vulnerable persons

For the purposes of the LAP the analysis for this gambling licensing objective will focus on vulnerable residents (including young people and adults who are vulnerable due to situation, health status and age) and on those who are economically vulnerable (those who are unemployed, in receipt of Universal Credit and those living in deprived areas).

Research evidence shows that people who on a low income, have a low level of educational attainment, are part of an ethnic minority or are young are more susceptible to gambling related harm.

#### Preventing gambling from being a source, associated with or used to support crime and disorder

For the purposes of the LAP this area of data and analysis will focus on anti-social behaviour, burglary, robbery and assault. This will help to inform any measures taken to promote this objective.

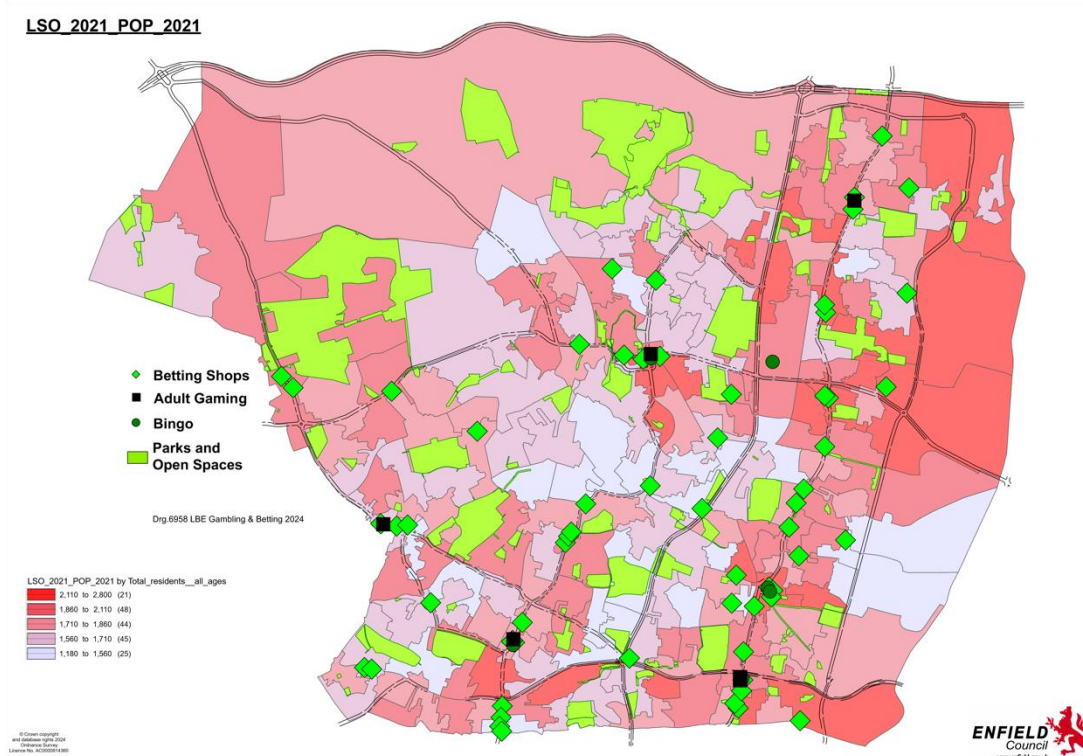
### **Enfield Profile**

Enfield is London's northernmost Borough and covers an area of 8219 hectares (82.2 square kilometres, or 31.7 square miles). Enfield has good links to the national motorway system, the north of the borough being bounded by the M25, accessed at

junctions 24 and 25. It also has two trunk roads – the A10 (London to Cambridge) and A406 (London's North Circular Road).

In 2019, the total dwelling stock in Enfield was estimated by the Office for National Statistics at 126,255.

Approximately 40% of the Borough's area is designated Green Belt Land (predominantly in the north and west) comprising country parks, farmland and open land (including urban parks, sports fields, golf courses, allotments and school playing fields). Figure 1.1 below shows a map of the borough.



## Gambling Local Area Profile

To best outline the impact and/or potential impact of gambling premises in the London Borough of Enfield this profile focuses primarily on the first two objectives, preventing crime and disorder and preventing exploitation of young and vulnerable people. To do this we have focused on three main areas of data:

- Data relating to social responsibility to young and vulnerable residents;
- Data relating to responsibilities to economically vulnerable residents; and,
- Data relating to crime and disorder.

By providing insight into how these areas of data correspond to the location and patterns of density of gambling premises within the borough the local area profile helps officers and Councillors in developing an appropriate Gambling Statement of Principles.

The Council expects matters such as the following to be considered by operators when making their risk assessment in order to demonstrate they have considered the local area. Some or many of these matters will have been considered and addressed by existing premises.

Matters relating to children and young persons, such as:

- The footfall in the local area, for example, does it predominately comprise residents, workers or visitors, is it a family orientated area, popular with children and young people;
- Significant presence of young children;
- Institutions, places or areas where presence of children and young persons should be expected such as schools, youth clubs, parks, playgrounds and entertainment venues such as bowling allies, cinemas etc.;
- Any premises where children congregate including bus stops, cafés, shops, and any other place where children are attracted;
- Areas that are prone to issues of youths participating in anti-social behaviour, including such activities as graffiti/tagging, underage drinking, etc.;
- Recorded incidents of attempted underage gambling;
- Transport links and parking facilities;
- Community centres;
- High crime area;
- Other gambling premises in the vicinity.

Matters relating to vulnerable adults, such as:

- Information held by the licensee regarding self-exclusions and incidences of underage gambling;
- Gaming trends that may mirror days for financial payments such as pay days or benefit payments;
- Arrangement for localised exchange of information regarding self-exclusions and gaming trends;
- Proximity of premises which may be frequented by vulnerable people such as hospitals, mental health providers, residential care homes, medical facilities, doctor's surgeries, council housing offices, addiction clinics or help centres, places where alcohol or drug dependant people may congregate, etc.;
- Homeless or rough sleeper shelters, hostels and support services;
- Transport links and parking facilities;
- Community centres;
- High crime area;
- High unemployment area;
- Pawn broker/pay day loan businesses in the vicinity;
- Other gambling premises in the vicinity.

These matters should be considered and taken into account in the Local Area Risk Assessment that gambling licence applicants are expected to undertake. If an

application for a new licence or variation is submitted that is within 400 metres of a premises/location where children, young persons and vulnerable persons are likely to be present, then operators are encouraged to provide details of the measures to be implemented that would overcome the risks to the objectives.

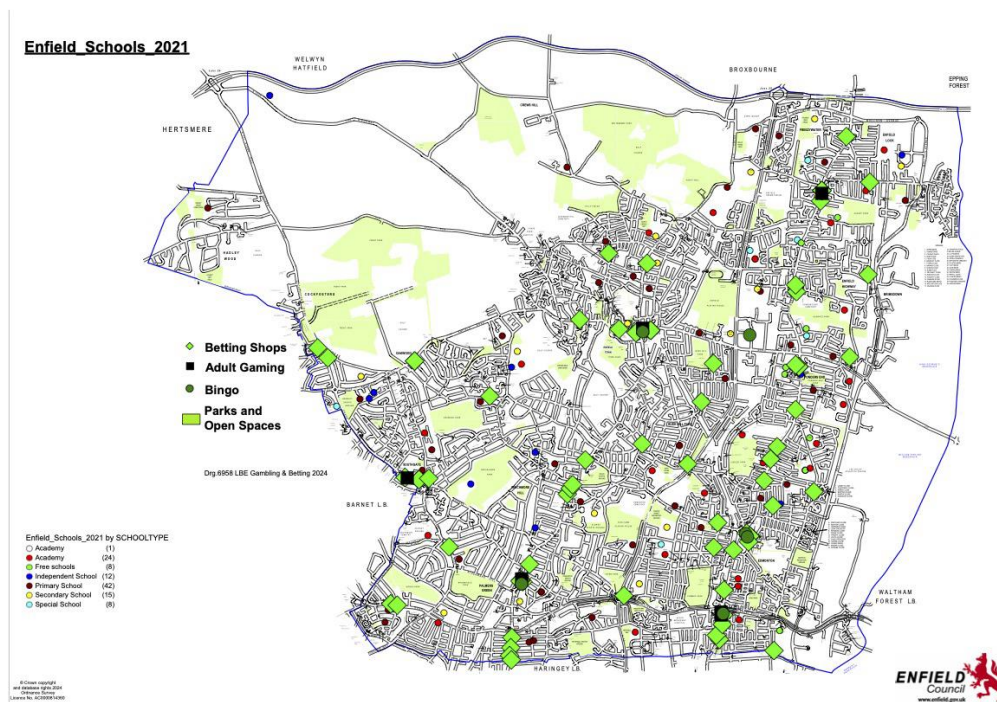
**Risks to young people and vulnerable residents**

This section is intended to outline the data and mapping to indicate where there are areas with higher concentrations of younger and more vulnerable people who may be less resilient to the potential negative impacts of gambling. Mapping this against concentrations of gambling premises may support more consideration of applications in those areas, and management of existing gambling premises with regard to their responsibilities as gambling licence holders.

Why are we focussing on vulnerable residents? This is both because we have a responsibility to vulnerable residents and because the evidence base outlines the increased risk of harm from gambling that vulnerable people are subject to.

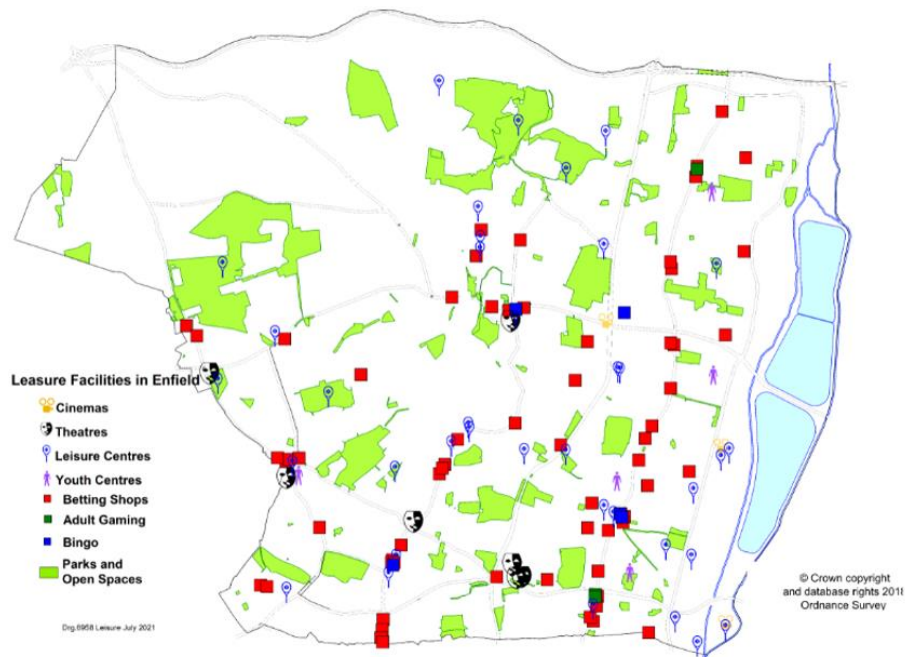
*Education locations*

This map shows the location of schooling across Enfield. As can be expected the concentrations of schooling match to areas of higher population, and therefore tend to correspond to some of the areas of higher gambling premises. In particular the Hertford Road corridor, Edmonton Green and Palmers Green show an overlap in concentration of schools (both academies and primary schools) and gambling premises, particularly betting shops and bingo premises. The Enfield Town area also shows some overlap also.



### *Leisure facilities*

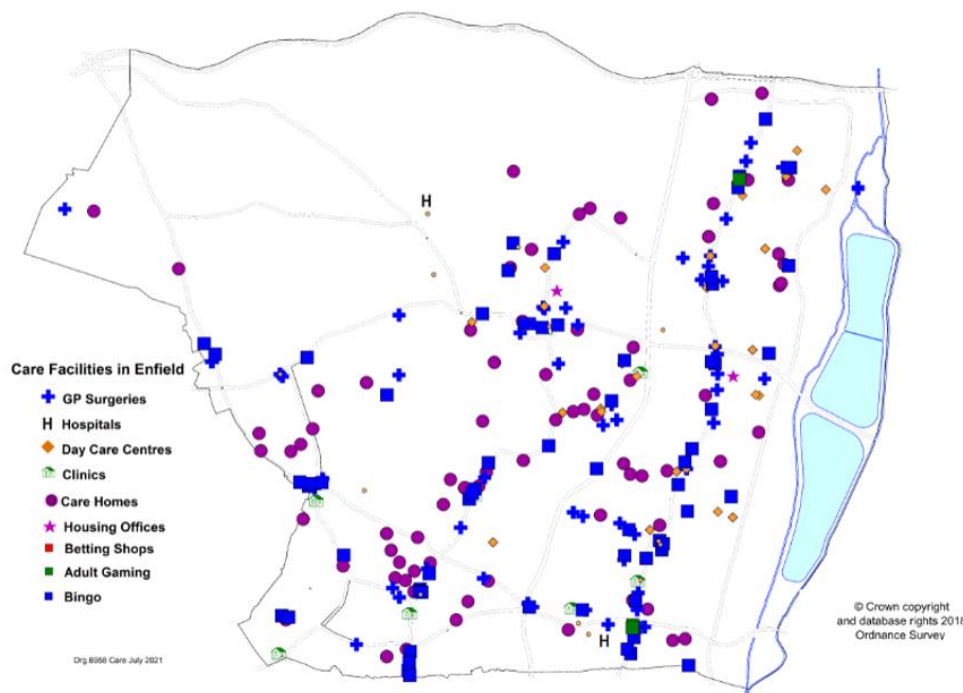
Concentrations of Youth Centres and Leisure Centres in the Hertford Road/Edmonton Green area align with concentrations of betting shops. There is also close proximity between a youth centre and betting shops in the Southgate area. Otherwise, distribution of gambling premises and leisure facilities is not particularly overlapping.



### *Medical centres*

The spread of medical centres across Enfield means that there is significant amount of overlap. In particular Palmers Green has a high level of over concentration overlap between care homes and betting shops, and in the Edmonton Green area a high number of GP surgeries also ensures a high level of concentration overlap. Overall these concentrations align to population concentration in the borough and it is not clear that these concentration overlaps represent additional levels of risk.

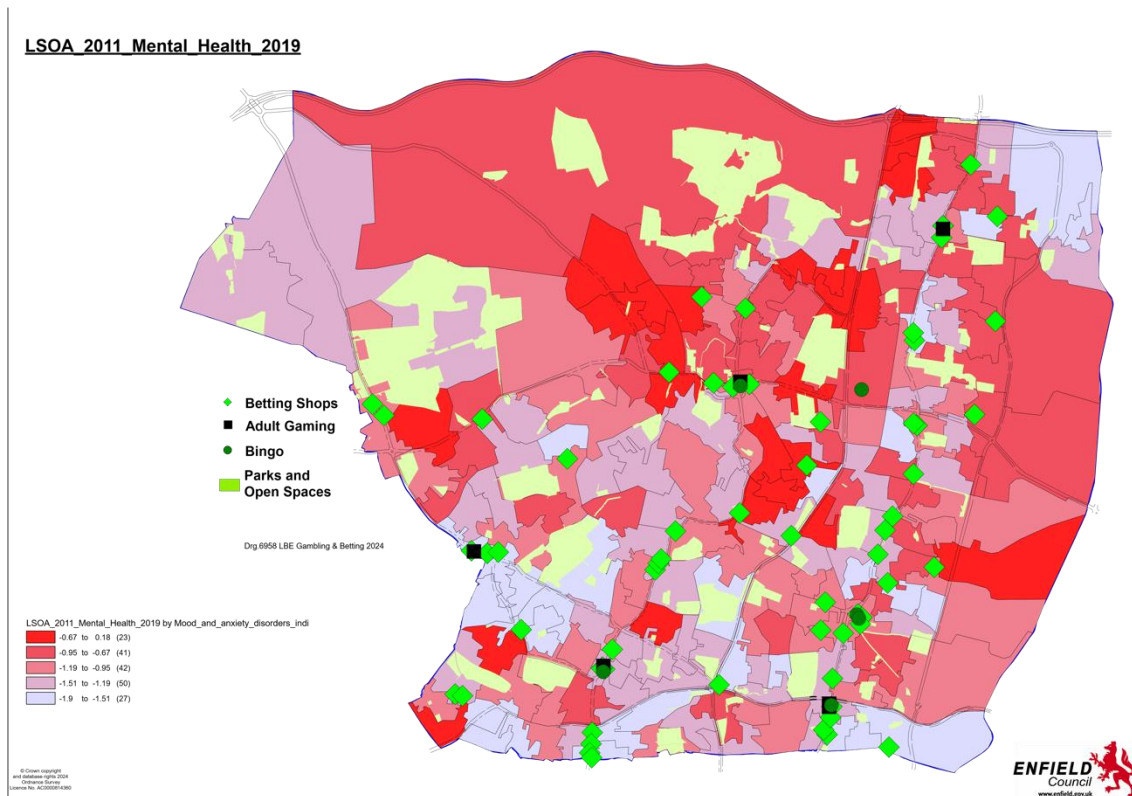




### *Areas of increased mental health concern*

The distribution of mood and anxiety disorders in Enfield do not show a significant alignment with higher concentrations of gambling premises. The closest concentration of gambling premises in areas of higher mental health needs are in the Enfield Town area.

However, the actual location of gambling premises of all types closely correlates to areas of high and medium mental health need. Although it is unlikely that this link is causal or an outcome of either higher mental health need or location of premises, it is a factor that creates an increased risk and needs to be taken into account by gambling licence applicants when conducting their local area risk assessments and by the Council in setting policy for gambling in Enfield.

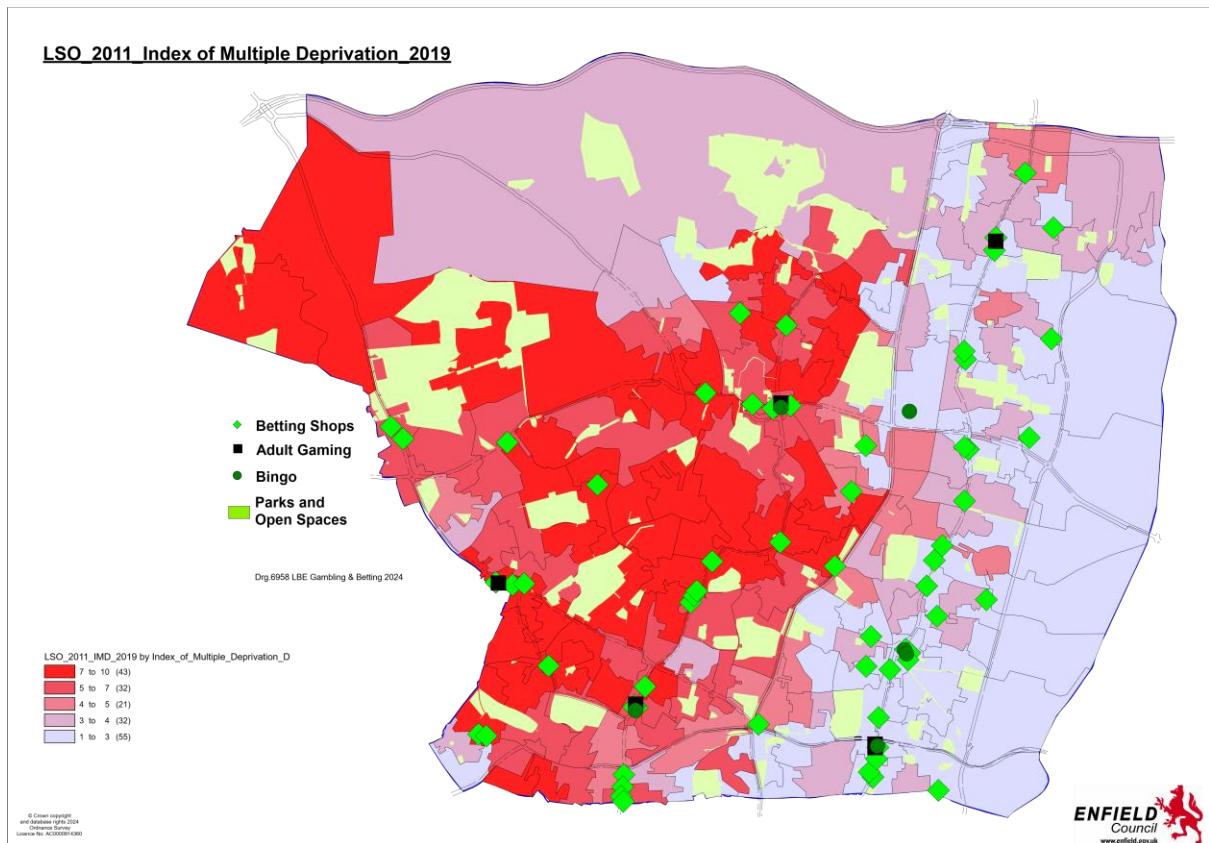


### Risks to economically vulnerable residents

This section is intended to highlight any concentrations of gambling premises with areas of economic insecurity, such as areas of higher unemployment and higher Universal Credit receipt. The potential for negative outcomes or impacts of gambling not in a responsible way are likely to be significantly more impactful for those who are economically insecure, particularly as any financial impact from gambling will have more impact for those with less economic security. Mapping this against concentrations of gambling premises may support more consideration of applications in those areas, and management of existing gambling premises with regard to their responsibilities as gambling licence holders.

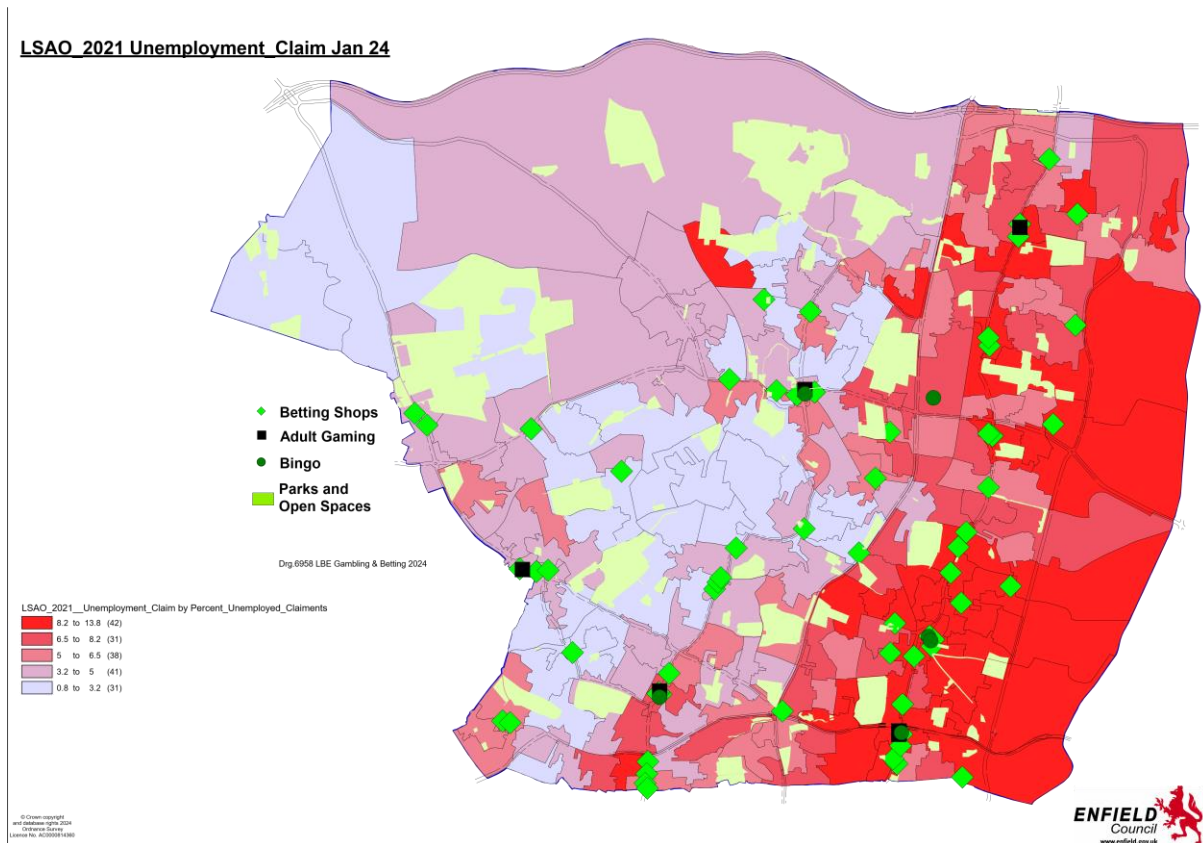
#### *Multiple deprivation indices*

The concentration of gambling premises all along the Hertford Road, taking in Edmonton Green, Lower Edmonton, Ponders End, Enfield Highway and Enfield Lock, is strongly correlated to areas of high deprivation. Approximately half of all gambling premises are within areas that have deprivation index scores below four. Given the increases potential for suffering economic harms due to gambling and the decreased ability to absorb gambling losses without suffering economic harms in these areas of higher deprivation this is an area of concern. Gambling licence applicants will need to take this into account take when conducting their local area risk assessments and the Council will also need to take this into account in setting policy for gambling in Enfield.



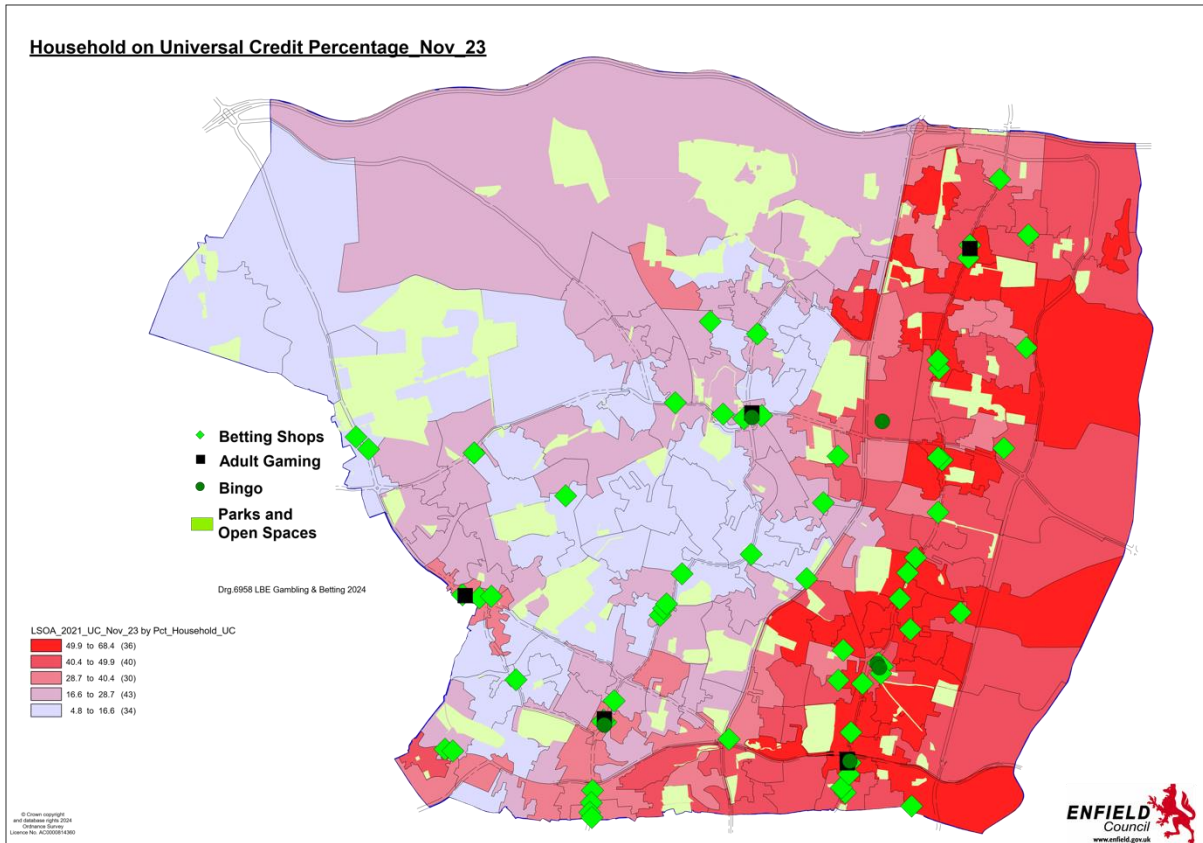
### *Unemployment map*

The overlap of gambling premises and areas of higher average unemployment is also notable along the Hertford Road, particularly in Edmonton Green, Lower Edmonton, Ponders End, Enfield Highway and Enfield Lock. It is also more notable in Bowes, where a small area of higher unemployment matches a cluster of betting shops. Given the increases potential for suffering economic harms due to gambling and the decreased ability to absorb gambling losses without suffering economic harms in these areas of higher deprivation this is an area of concern. Gambling licence applicants will need to take this into account take when conducting their local area risk assessments and the Council will also need to take this into account in setting policy for gambling in Enfield.



### *Households on Universal Credit map*

The concentration of gambling premises all along the Hertford Road, taking in Edmonton Green, Lower Edmonton, Ponders End, Enfield Highway and Enfield Lock, is strongly correlated to areas of high numbers of households on Universal Credit. Approximately half of all gambling premises are within areas that have between 40 and 68% of households in receipt of Universal Credit. Given the increases potential for suffering economic harms due to gambling and the decreased ability to absorb gambling losses without suffering economic harms in these areas of higher deprivation this is an area of concern. Gambling licence applicants will need to take this into account take when conducting their local area risk assessments and the Council will also need to take this into account in setting policy for gambling in Enfield.

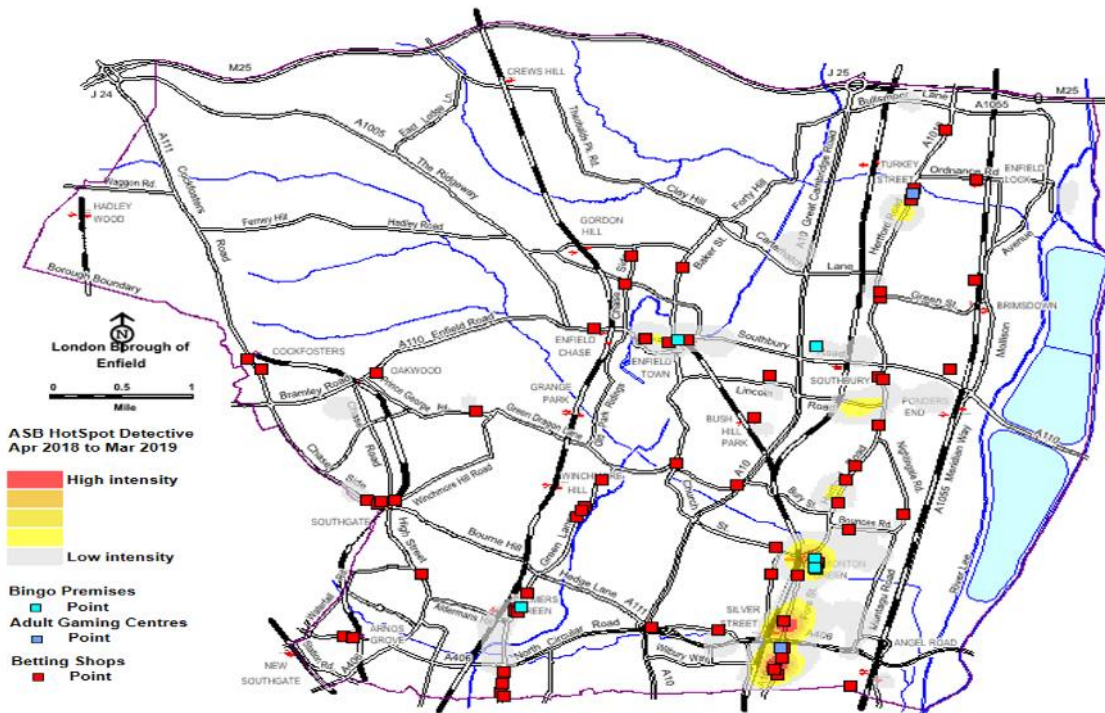


### Preventing crime and disorder

Research indicates that there is a correlation between crime and concentrations of gambling premises. This is particularly notable where other factors related to crime are also present, such as area deprivation and some aspects of place management (eg. Location of bus stops, take away food shops etc.). Understanding where concentrations of crime and concentrations of gambling premises overlap is important to developing responses to this, both within the Gambling Statement of Principles and through other means at the Council's disposal.

### *Anti-social Behaviour map*

As per a number of the other indicators and data sets, the primary concentration of anti-social behaviour incidents in Enfield are clustered along the Hertford Road, particularly in Edmonton Green, Ponders End and Enfield Lock. These clusters align closely with clusters of gambling premises – including 2 of 5 Bingo premises and 2 of adult gaming centres. Gambling licence applicants will need to take this into account when conducting their local area risk assessments and the Council will also need to take this into account in setting policy for gambling in Enfield.



## Data sources

The data sources being used for the updated LAP are primarily the same as used for the previous LAP, this provides continuity and comparability, accounting for changes and allowing for comparison to a baseline. The source of each data set is noted next to it in the above list.

## Conclusions

The data and mapping show clear co-location of gambling premises and:

- Locations of facilities used by younger and more vulnerable people;
- Areas of deprivation and economic vulnerability; and,
- Locations of anti-social behaviour in the borough.

The data and mapping show clear areas of concern in the borough that may need additional consideration within the Gambling Policy to ensure that the risks and potential harms are minimised.

## Enfield Equality Impact Assessment (EqIA)

### Introduction

The purpose of an Equality Impact Assessment (EqIA) is to help Enfield Council make sure it does not discriminate against service users, residents and staff, and that we promote equality where possible. Completing the assessment is a way to make sure everyone involved in a decision or activity thinks carefully about the likely impact of their work and that we take appropriate action in response to this analysis.

The EqIA provides a way to systematically assess and record the likely equality impact of an activity, policy, strategy, budget change or any other decision.

The assessment helps us to focus on the impact on people who share one of the different nine protected characteristics as defined by the Equality Act 2010 as well as on people who are disadvantaged due to socio-economic factors. The assessment involves anticipating the consequences of the activity or decision on different groups of people and making sure that:

- unlawful discrimination is eliminated
- opportunities for advancing equal opportunities are maximised
- opportunities for fostering good relations are maximised.

The EqIA is carried out by completing this form. To complete it you will need to:

- use local or national research which relates to how the activity/ policy/ strategy/ budget change or decision being made may impact on different people in different ways based on their protected characteristic or socio-economic status;
- where possible, analyse any equality data we have on the people in Enfield who will be affected eg equality data on service users and/or equality data on the Enfield population;
- refer to the engagement and/ or consultation you have carried out with stakeholders, including the community and/or voluntary and community sector groups you consulted and their views. Consider what this engagement showed us about the likely impact of the activity/ policy/ strategy/ budget change or decision on different groups.

The results of the EqIA should be used to inform the proposal/ recommended decision and changes should be made to the proposal/ recommended decision as a result of the assessment where required. Any ongoing/ future mitigating actions required should be set out in the action plan at the end of the assessment.

## Section 1 – Equality analysis details

<b>Title of service activity / policy/ strategy/ budget change/ decision that you are assessing</b>	<b>Review of the Statement of Licensing Policy (Alcohol) and the Gambling Statement of Licensing Principles</b>
<b>Team/ Department</b>	<b>Licensing Team Environment &amp; Street Scene Department</b>
<b>Executive Director</b>	<b>Perry Scott</b>
<b>Cabinet Member</b>	<b>Cllr Susan Erbil</b>
<b>Author(s) name(s) and contact details</b>	<b>Martin Rattigan <u><a href="mailto:Martin.rattigan@enfield.gov.uk">Martin.rattigan@enfield.gov.uk</a></u> 0208 132 0927</b>
<b>Committee name and date of decision</b>	<b>Cabinet 16/10/24</b>
<b>Date of EqIA completion</b>	

<b>Date the EqIA was reviewed by the Corporate Strategy Service</b>	
<b>Name of Head of Service responsible for implementing the EqIA actions (if any)</b>	
<b>Name of Director who has approved the EqIA</b>	

The completed EqIA should be included as an appendix to relevant EMT/ Delegated Authority/ Cabinet/ Council reports regarding the service activity/ policy/ strategy/ budget change/ decision. Decision-makers should be confident that a robust EqIA has taken place, that any necessary mitigating action has been taken and that there are robust arrangements in place to ensure any necessary ongoing actions are delivered.

## Section 2 – Summary of proposal

Please give a brief summary of the proposed service change / policy/ strategy/ budget change/project plan/ key decision

**Please summarise briefly:**



What is the proposed decision or change?  
What are the reasons for the decision or change?  
What outcomes are you hoping to achieve from this change?  
Who will be impacted by the project or change - staff, service users, or the wider community?

The proposed decision is to allow for the Statement of Licensing Policy (“Licensing Policy”) and the Statement of Principles for Gambling Licensing (“Gambling Policy”) to be republished by 28<sup>th</sup> and 31<sup>st</sup> of January 2025 respectively.

It is a statutory requirement under the Licensing Act 2003 and the Gambling Act 2005 to consult on, refresh and republish the Licensing Policy every 5 years and the Gambling Policy every 3 years.

Both policies have undergone stakeholder engagement, redevelopment to reflect legislative and guidance changes, stakeholder priorities and concerns, any other updates or improvements required, and has now been through public consultation and amended accordingly.

Each policy is intended to continue the effective management of the licensed alcohol and gambling trades within the borough to ensure these are available to those who use them responsibly and are of minimal negative impact to residents and other businesses in the borough.

Both policies have an impact on businesses and the wider community.

## Section 3 – Equality analysis

This section asks you to consider the potential differential impact of the proposed decision or change on different protected characteristics, and what mitigating actions should be taken to avoid or counteract any negative impact.

According to the Equality Act 2010, protected characteristics are aspects of a person's identity that make them who they are. The law defines 9 protected characteristics:

1. Age
2. Disability
3. Gender reassignment.
4. Marriage and civil partnership.
5. Pregnancy and maternity.
6. Race
7. Religion or belief.
8. Sex
9. Sexual orientation.

At Enfield Council, we also consider care experience and socio-economic status as an additional characteristic.

“Differential impact” means that people of a particular protected characteristic (eg people of a particular age, people with a disability, people of a particular gender, or people from a particular race and religion) will be significantly more affected by the change than other groups. Please consider both potential positive and negative impacts, and provide evidence to explain why this group might be particularly affected. If there is no differential impact for that group, briefly explain why this is not applicable.

Please consider how the proposed change will affect staff, service users or members of the wider community who share one of the following protected characteristics.

**Detailed information and guidance on how to carry out an Equality Impact Assessment is available [here](#). (link to guidance document once approved)**

**Age**

This can refer to people of a specific age e.g. 18-year olds, or age range e.g. 0-18 year olds.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people of a specific age or age group (e.g. older or younger people)?

Please provide evidence to explain why this group may be particularly affected.

It is unlikely to have a significant impact on any specific age group. Under 18 year olds are by law not allowed to purchase alcohol or to gamble, however, many licensed businesses will cater to under 18 years olds with other offers (eg. Families dining at a pub or restaurant etc). However, there is no obvious differential impact.

**Mitigating actions to be taken**

None required.

**Disability**

A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on the person's ability to carry out normal day-day activities.

This could include: physical impairment, hearing impairment, visual impairment, learning difficulties, long-standing illness or health condition, mental illness, substance abuse or other impairments.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people with disabilities?

Please provide evidence to explain why this group may be particularly affected.

It is unlikely that this consultation or policy will have a differential impact on people with disabilities. It is unlikely that the policy will change the experience people with disabilities have in licensed or gambling premises.

**Mitigating actions to be taken**

None required.

--

### Gender Reassignment

This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on transgender people?

Please provide evidence to explain why this group may be particularly affected.

It is unlikely that the either policy will have a differential impact those undergoing or having gone through gender reassignment.

However, the Licensing Policy does include a section outlining an expectation that licensees consider ways in which they can protect vulnerable groups, including trans people, from violence, intimidation and exploitation in the night time economy.

### Mitigating actions to be taken

No further actions required.

### Marriage and Civil Partnership

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the U.K both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people in a marriage or civil partnership?

Please provide evidence to explain why this group may be particularly affected.

There will be no differential impact relating to marital status in either policy.

**Mitigating actions to be taken**

None required.

**Pregnancy and maternity**

Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on pregnancy and maternity?

Please provide evidence to explain why this group may be particularly affected.

There will be no differential impact relating to pregnancy and maternity in either policy.

**Mitigating actions to be taken**

None required.

**Race**

This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people of a certain race?

Please provide evidence to explain why this group may be particularly affected.

There will be no differential impact relating to people of a certain race in either policy.

<b>Mitigating actions to be taken</b>
None required.

<b>Religion and belief</b>
Religion refers to a person's faith (e.g. Buddhism, Islam, Christianity, Judaism, Sikhism, Hinduism). Belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live.
Will this change to service/policy/budget have a <b>differential impact [positive or negative]</b> on people who follow a religion or belief, including lack of belief?  Please provide evidence to explain why this group may be particularly affected.
There will be no differential impact relating to religion or a belief, including lack of belief, in either policy.
<b>Mitigating actions to be taken</b>
None required.

<b>Sex</b>
Sex refers to whether you are a female or male.
Will this change to service/policy/budget have a <b>differential impact [positive or negative]</b> on females or males?  Please provide evidence to explain why this group may be particularly affected.
There will be no differential impact relating to sex in either policy.

<b>Mitigating actions to be taken</b>
None required.

<b>Sexual Orientation</b>
This refers to whether a person is sexually attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual.
Will this change to service/policy/budget have a <b>differential impact [positive or negative]</b> on people with a particular sexual orientation?
Please provide evidence to explain why this group may be particularly affected.
There will be no differential impact relating to sexual orientation in either policy. However, the Licensing Policy does include a section outlining an expectation that licensees consider ways in which they can protect vulnerable groups, including trans people, from violence, intimidation and exploitation in the night time economy.
<b>Mitigating actions to be taken</b>
No further actions required.

<b>Care Experience</b>
This refers to a person who has spent 13 weeks or more in local authority care.
Will this change to service/policy/budget have a <b>differential impact [positive or negative]</b> on people with care experience?
Please provide evidence to explain why this group may be particularly affected.
There will be no differential impact relating to care experience in either policy.

<b>Mitigating actions to be taken</b>
None required.

<b>Socio-economic deprivation</b>
This refers to people who are disadvantaged due to socio-economic factors e.g. unemployment, low income, low academic qualifications or living in a deprived area, social housing or unstable housing.
Will this change to service/policy/budget have a <b>differential impact [positive or negative]</b> on people who are socio-economically disadvantaged?  Please provide evidence to explain why this group may be particularly affected.
There will be no differential impact relating to socio-economic disadvantage in either policy.  However, the Gambling Policy introduces a Gambling Vulnerability Area which is intended to reduce any additional impact of new gambling premises on those suffering socio-economic deprivation in the Edmonton and Enfield Highway areas.
<b>Mitigating actions to be taken.</b>
None required.



## Section 4 – Monitoring and review

How do you intend to monitor and review the effects of this proposal?

Who will be responsible for assessing the effects of this proposal?

The Licensing Policy is required to be reviewed within 5 years of publication and republication. The Licensing Policy is in use as part of the Licensing process continuously and is monitored continuously.

The Licensing Team is responsible for assessing the effects of the Gambling Policy.

The Gambling Policy is required to be reviewed within 3 years of publication and republication. The Gambling Policy is in use as part of the Gambling Licensing process continuously and is monitored continuously.

The Licensing Team is responsible for assessing the effects of the Gambling Policy.

## Section 5 – Action plan for mitigating actions

Any actions that are already completed should be captured in the equality analysis section above. Any actions that will be implemented once the decision has been made should be captured here.

Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/Comments
No issues have been identified.	N/A	N/A	N/A	N/A	N/A

## Enfield Licensing Policy and Gambling Policy: Substantive submissions and responses

The Enfield Statement of Licensing Policy and Enfield Statement of Principles for Gambling Licensing consultation took place from the 17<sup>th</sup> of May 2024 to the 12<sup>th</sup> of August 2024. The consultation took place online with respondents asked to provide email responses to the consultation. The online consultation received 24 (20 & 4) responses, plus one received on the Licensing Policy after the closing deadline for the consultation.

Recommended changes and amendments in response to the consultation are outlined in the third section and an amended copy of the Licensing Policy and Gambling Policy are appended.

# Statement of Licensing Policy

## Consultation responses

Submitter	Section	Submission comment	Response comment
1. (resident)	Cumulative Impact Policies	I live on Melbourne Avenue N13. I agree with the policy and with the need for Bowes and Palmers Green to be included in cumulative impact policy. Whilst I did not see specifics about this in terms of the above areas, I agree that the area has changed significantly with the types of premises opening up and the increase of crime/ anti social behaviour. Overall the document is detailed and covers all areas and is needs to be updated to address changing landscape. Of course the key issue is enforcement. Hopefully resources will be available for this.	<ul style="list-style-type: none"> <li>Support for the new proposed CIZs.</li> <li>Support overall for the Licensing Policy</li> </ul> <p>Amendments needed.</p>
2.(resident)	Cafes, VAWG, Entry and Exit, CIZs	<p>In response to the consultation I am writing to express my support for the introduction of a cumulative impact zone in Palmers Green.</p> <p>As a resident on Lakeside Road, my family and I are increasingly dismayed at the increasing number of male-only cafes on Alderman's Hill and Green Lanes and would welcome measures to stop any more from opening. The cumulative impact on the areas below is vast and created an unwelcoming and hostile environment, which families and in particular women are choosing to avoid. For example, many residents and families walk now on the park side of Alderman's hill to avoid groups of men and cigarettes smoke. Friends who used to visit the area no longer do.</p> <p>Anti-social behaviour such as the items below are an openly visible daily occurrence. They are well documented by residents and complaints to the police, the council, councillors and parking services teams.</p> <ul style="list-style-type: none"> <li>- loitering in groups and blocking pavements for passers by</li> <li>- smoking and drinking on the pavements and spilling into Broomfield Park</li> <li>- openly discarding rubbish and cigarette butts on the pavements and roadsides</li> <li>- parking illegally on double yellow lines and across residents drives</li> <li>- leering at passing women</li> <li>- unwelcoming and overpowering behaviour towards passers by</li> </ul>	<ul style="list-style-type: none"> <li>Support for the new proposed CIZ in Palmers Green.</li> </ul> <p>Amendments made.</p>

		<p>- openly dealing drugs on residential streets and through car windows - excessive noise</p> <p>This is largely a residential, family area full of children and older residents. The community does not want more male-only bars, cafes and gambling joints. Children are walking to school around here and families are trying to earn an honest living.</p> <p>I would therefore support any measures that can help stop any further negative impact on the area. Please let me know if you have any questions.</p>	
3.(resident)	Cafes, VAWG, Entry and Exit, CIZs	<p>I am writing to provide feedback on the draft Licensing Policy Statement currently under consultation. While I appreciate the comprehensive approach outlined in the policy, I believe there are critical issues that need to be addressed to ensure the well-being and comfort of all residents in the Enfield area.</p> <p>1. Loitering Outside Shops:</p> <p>It has come to my attention that loitering outside certain shops, particularly cafes bars (i.e. 'Castle Coffee' on 63 Chase Side, London N14 5BU; 'Grande Caffe Bar' on 2 Station Parade, Barnet EN4 0DL) has become a significant issue. Groups of people congregate outside these establishments, making fellow residents feel uncomfortable and intimidated. This situation is exacerbated by the specific type of 'cafe bars' that have been opening in Enfield, which are frequented almost exclusively by young adult males. These cafes have become focal points for gatherings where individuals spend extended periods outside, often engaging in behaviour that creates an unwelcome atmosphere based on ethnicity or gender. Anti-social and intimidating loitering, which obstructs a public right of way, as well as smoking in a pavement area should be explicitly prohibited.</p> <p>2. Menacing Behaviour:</p> <p>Residents, particularly women, have reported experiencing menacing stares and unwelcome advances from these groups. This behaviour not only creates an uncomfortable environment but also raises concerns about public safety. The Licensing Policy should include measures to restrict the number of people allowed to stand outside licensed premises to prevent such intimidating congregations.</p> <p>3. Consideration of Similar Businesses:</p>	

		<p>Additionally, it is important that the Licensing Authority considers the presence of similar businesses (i.e. Cafe Bars) within the area before granting new licenses. Over-concentration of the same type of establishments can lead to increased anti-social behaviour and negatively impact the community. A thorough assessment should be conducted to ensure that new licenses are only granted when they add genuine value to the local area and do not exacerbate existing issues.</p> <p>4. Inclusive Operation of Venues:</p> <p>Licensing should also examine how venues will operate to ensure they are inclusive for all residents and not exclusively serve a specific group of people. Many of the recent 'cafe bars' appear to cater solely to young males from a specific ethnic background, which can contribute to an unwelcoming environment for other community members. Venues should be encouraged to adopt inclusive practices that promote diversity and welcome patrons from all backgrounds.</p> <p>5. Enforcement of Licensing Conditions:</p> <p>It is crucial that the council sets out and makes available to residents how it intends to take action where there is a breach in licensing. Clear guidelines on enforcement actions will reassure residents that their concerns are taken seriously and that there are mechanisms in place to address any violations of the licensing terms.</p> <p><u>Proposed Additions to the Licensing Policy:</u></p> <p>Restricting Loitering: Implement clear guidelines on the number of people permitted to gather outside licensed premises. Establishments should be required to manage and disperse crowds to maintain public order.</p> <p>Behavioural Conduct: Introduce policies that mandate licensed premises to actively discourage and report any menacing or discriminatory behaviour observed outside</p>	<ul style="list-style-type: none"> <li>• Section O: Outside Spaces, particularly 11.56, addresses the issue of loitering and intimidation and nuisance issues for the wider public. Also Section S: Dispersal and Entry, particularly para 11.70 addresses the issues of managing issues of dispersal and entry.</li> <li>• Section L: Violence Against Women and Girls, and Section</li> </ul>
--	--	---	---

		<p>their establishments.</p> <p>Assessment of Similar Businesses: Include a clause in the Licensing Policy that requires a review of existing similar businesses in the vicinity before approving new licenses. This will help maintain a balanced and diverse local economy while preventing the negative impact of over-concentration.</p> <p>Inclusive Operation: Require that venues demonstrate how they will operate inclusively, ensuring their services are accessible and welcoming to all residents, rather than catering exclusively to a specific demographic.</p> <p>No smoking signage: For licenses that have a pavement license - where furniture can be placed outside on the pavement - the premises should include clear no smoking signage. Smoking is prohibited, as noted in the Standard Condition sets out by the <a href="#">Pavement Licence (Business &amp; Planning Act 2020)</a></p> <p>Enforcement and Accountability: Clearly outline the council's approach to enforcing</p>	<p>M: Violence Against Vulnerable People in the Nighttime Economy address the need to ensure that licensees should directly address intimidatory and discriminatory behaviour in their premises.</p> <ul style="list-style-type: none"> <li>• It is not possible to do this under the Licensing Act 2003, other than via cumulative impact which does not differentiate between business types.</li> <li>• It is not possible under the Licensing Act 2003 to restrict a licensed premises to cater to one specific demographic and this is relatively common for licensed premises to cater to a specific demographic, cultural group, style or preference. As long as they do not specifically exclude anyone, they are not required to create a welcoming environment for them.</li> <li>• The Licensing Policy clearly indicates a requirement to abide by all other regulations and legislation, particularly on smoking.</li> <li>• Section G: Enforcement outlines</li> </ul>
--	--	--	--

		<p>licensing conditions and handling breaches. Make this information readily available to residents to ensure transparency and accountability in the licensing process.</p> <p>I hope these points will be considered in the final version of the Licensing Policy Statement. Ensuring a safe and welcoming environment for all residents should be a top priority, and these measures will contribute significantly to achieving that goal.</p> <p>Thank you for considering my feedback. I look forward to seeing a revised policy that addresses these important issues.</p>	<p>the Council's approach to enforcement.</p>
4.(resident)	<p>Cafes, VAWG, Entry and Exit, CIZs</p>	<p>The amount of 'cafes' that have appeared in Southgate and Palmers Green to name a couple of areas is appalling.</p> <p>I and my 3 girls never walk around Southgate any more because of the threatening and leering behaviour of the men that frequent these cafes. School girls from Ashmole &amp; Southgate secondary schools are shouted and disgusting things are said.</p> <p>They have turned a lovely area into a no go zone for girls/women.</p> <p>I think it's very obvious what these men do all day long and nothing is done about their threatening and unpleasant behaviour.</p> <p>It would be for the council to step in and put a stop to these cafes.</p>	<ul style="list-style-type: none"> <li>• Support for the new proposed CIZ in Palmers Green.</li> </ul> <p>Amendments made.</p>
5.(resident)		<p>Enfield Council should review giving licenses to any further businesses which include cafe bars, barbers and nail shops or gambling establishments. The worst offenders are all the new male only cafes and bars, which are rumoured to be fronts for money laundering. Whether this is true or not, the fact is that the number of all male cafe bars in Southgate, Palmers Green and now Winchmore Hill is detrimental to the family feel of the high street and as a woman, I feel excluded from these establishments. As do many others.</p> <p>These high streets are close to becoming no go areas to women. I work locally and also live in the borough and can say that these establishments make the area extremely unattractive and I have considered moving elsewhere.</p> <p>There are so many positive and inclusive businesses that have opened up and we should be attracting more.</p> <p>I also think that there should be more care about what the shop fronts look like. The newly opened Lemon grocery store in Palmers Green is an eyesore and as much as the shop is very nice, the outside is so unattractive and uninviting. So is the new</p>	<ul style="list-style-type: none"> <li>• Support for the new proposed CIZ in Palmers Green.</li> </ul> <p>Amendments made.</p>



		<p>furniture store across the road.          Surely businesses could be advised on keeping in with the period feel or get advice on acceptable design?          There should be a focus on attracting national businesses to open branches as well as more independent shops.          There are many young people who could do with some encouragement to open a start up, like what is happening to Oxford Street after Westminster decided to do something about all the poor quality retailers.</p>	
6. (resident)		<p>Much to many of the same sort of cafes. All dominated by males.          Southgate is being destroyed.</p>	<ul style="list-style-type: none"> <li>• Support for the new proposed CIZ in Palmers Green.</li> </ul> <p>Amendments made.</p>
7. (resident)		<p>Response to Public Licensing Consultation</p> <p><b>Growing Numbers of Cafe Bars</b>          We have observed an over-concentration of similar cafe bar establishments, which has led to increased anti-social behavior and negatively impacted the community. For example, Ashfield Parade in Southgate is dominated exclusively by these cafe bars, catering primarily to young to middle-aged males. A thorough assessment is necessary to ensure that new licenses genuinely add value to the local area and community, rather than being granted indiscriminately.</p> <p><b>Loitering</b>          Loitering in groups outside these cafe bars has become a significant issue. Licensing should address loitering, excessive smoking, blocking public pathways, and anti-social behavior. This is especially important near schools and areas frequented by families.</p> <p><b>Inclusive Operation of Venues</b>          Venues should be encouraged to adopt inclusive practices that promote diversity and welcome patrons from all backgrounds. Currently, many of these establishments cater exclusively to young males, creating an unwelcoming and intimidating environment for other community members.</p> <p><b>Lack of Community Engagement</b>          It is also expected that applicants will canvass the views of their neighbors and local residents, as this can clear up any ambiguities and develop a relationship based on</p>	<ul style="list-style-type: none"> <li>• Support for the new proposed CIZ in Palmers Green.</li> </ul> <p>Amendments made.</p>

		<p>mutual cooperation before an application is made. This may be facilitated by making direct contact with neighbors and any local group that represents residents or businesses. This will also assist the applicant in understanding at the outset what the community believes is acceptable in their area.</p> <p>Unfortunately, there appears to be a significant lack of adherence to this clause. The absence of proactive engagement with the community by the applicants has resulted in misunderstandings and a lack of mutual cooperation. This oversight must be addressed to ensure that future applications are better aligned with the community's expectations and needs.</p> <p>We urge the licensing authority to enforce this requirement rigorously, ensuring that applicants engage meaningfully with local residents and businesses before proceeding with their applications. This will help foster a more cohesive and supportive community environment.</p>	
8. (resident)		<p>As a resident of Palmers Green, I would also like to bring to your attention the same issue is not solely in Southgate.</p> <p>There are a number of day/evening cafes along Aldermans Hill and Green Lanes. They all look very pleasant but they is an intimidating feel to them as they are mainly occupied by men only who sit outside, this is making access to the premises difficult with an appearance of being off limits.</p> <p>I enjoy going to a cafe for a chilled coffee or beverage and so along Cannon Hill, even here there is a cafe that is predominantly groups of loud males. It is intimidating and unfriendly.</p> <p>Please limit the number of these premises within a small section to allow a full and enriched choice of shops for the community.</p> <p>This isn't restricted just to cafe's, there are a large number of continental supermarkets too, which equally dominate each high street! I agree an enriched environment is important but please don't allow the diversity if cafes and supermarkets to flood the environment forcing people to the internet. Please look at your costs for these premises, are they too high? Is it these premises can only afford them? Both cafes and supermarkets are open early till late, is this the only they can make a living?</p>	<ul style="list-style-type: none"> <li>• Support for the new proposed CIZ in Palmers Green.</li> </ul> <p>Amendments made.</p>
9. (resident)		<p>I understand the council are considering making Palmers Green, including the parade of shops along Aldermans Hill as far as Lakeside Road, a Cumulative Impact Zone. I am very much in favour of this proposal. With the decline of retail</p>	<ul style="list-style-type: none"> <li>• Support for the new proposed CIZ in Palmers Green.</li> </ul>

	<p>there are more and more cafes and bars opening up which have the potential to encourage the congregation of people who may behave in an anti-social manner. This is obviously a particular concern with businesses which are selling alcohol. In Grovelands Road we have already had considerable problems with customers of local cafes and bars behaving in an anti-social manner. It therefore seems highly desirable to limit the further proliferation of bars, etc selling alcohol. I feel sure that this will also be a benefit for the more central parts of Palmers Green in Green Lanes, etc.</p>	<p>Amendments made.</p>
<p>10. (resident)</p>	<p>I am uncomfortable about the fact that there are far too many of the same type of cafes and bars now in Southgate and I understand that you are considering allowing more to open up. Southgate used to be a family area but now there are a large number of Eastern European men who spend their days drinking coffee in these cafes/bars and ogling at passers-by - this is intimidating and uncomfortable when you are just trying to walk past. Whilst Southgate is a diverse and multi-cultural area generally, the excess proportion of cafes catering to one type of clientele only is not diverse at all. It encourages a group mentality and anti-social behaviour which is detrimental to the majority of the residents of Southgate and makes the centre a no-go area for those of us who have lived here for many years.</p> <p>Please consider the residents of Southgate and take our views into consideration. You should be encouraging more shops to open up as well as a more varied selection of bars and restaurants that are not solely cafes selling coffee. I find it quite amazing that so many of these 'coffee shops' are being allowed to open up - not wanting to cast aspersions on the owners of these premises but does anyone actually look into their finances to make sure their business is actually legitimate?</p> <p>I have been a resident of Southgate for 23 years now having brought my children up and sent them to school in the area, but I now feel so out of place when I walk up to the high street (Chase Side) that I am eager to get home as quickly as possible. Surely you should be wanting people to pass time in their local town centre and spend money to make Southgate more profitable. By favouring one specific place of business you are focusing on a small percentage of the population of the area but because there are so many of the same type of establishment it looks to many of us that this is the majority of people that reside in the area which it most certainly is not.</p> <p>I employ you to see sense and not keep giving licenses to yet more of the same cafes/bars.</p>	<ul style="list-style-type: none"> <li>• Support for the new proposed CIZ in Palmers Green.</li> </ul> <p>Amendments made.</p>

11. (resident)	<p>I would like to write to you about the have your say policy here:  <a href="https://www.enfield.gov.uk/consultations/licensing-policy-statement">https://www.enfield.gov.uk/consultations/licensing-policy-statement</a></p> <p>I want to say I have written in time and time again about the "coffee shops" bars and restaurants in Bowes area. I live around Berkshire Gardens and everyone knows in the area about the same troubleshoot places. They all have the same pattern, either no customers or a few men sat outside all day. They harass everyone in the area, make it feel unsafe and take up space for businesses that could be used for social hubs or much local shops or services.</p> <p>Not that anyone pays attention but there was a murder on this road last year: <a href="https://www.bbc.co.uk/news/articles/c04x9m4jzvm0">https://www.bbc.co.uk/news/articles/c04x9m4jzvm0</a></p> <p>This just exposed what everyone around here already knows, drugs, weapons and young women are being run out of these businesses and they have a front that is set up by: Noel Samaroo  <a href="https://find-and-update.company-information.service.gov.uk/company/09856182/filing-history">https://find-and-update.company-information.service.gov.uk/company/09856182/filing-history</a></p> <p>Who also has his own legal problems. People wrote and complained begged Enfield to not give an new license to B7 you did: <a href="https://www.enfieldindependent.co.uk/news/24425084.enfield-council-grants-green-lanes-cafe-bar-alcohol-licence/#:~:text=A%20cafe%20has%20been%20granted,third%20bar%20that%20serves%20alcohol%E2%80%9D">https://www.enfieldindependent.co.uk/news/24425084.enfield-council-grants-green-lanes-cafe-bar-alcohol-licence/#:~:text=A%20cafe%20has%20been%20granted,third%20bar%20that%20serves%20alcohol%E2%80%9D</a>.</p> <p>This place is a lot quieter than before (although there is gambling being held in the back) the fact its always empty shows they do not have the customers to pay the business rates and the money must be coming in else where.</p> <p>Overall Enfield has been asleep at the wheel and the whole of the green lanes street is run over with either salons, barbers or these all day alcohol serving coffee shops. There is not enough business to keep more than 3 of each of this type of business on this road yet you find 5 or 6 of each, not including the wood green side of the border.</p> <p>There are cars constantly parked in the road or on the pavement (always blacked out expensive cars) meaning buses can't stop or the whole area feeling safe. I have</p>	<ul style="list-style-type: none"> <li>• Support for the new proposed CIZ in Palmers Green.</li> </ul> <p>Amendments made.</p>
----------------	---	--

		<p>been followed home, cat called, seen them praying on young teenage girls coming home from school, my husband has been offered drugs, to come gamble or to have a fight... always the same, no change and its only getting worse.</p> <p>You only have to see Google reviews to know these businesses are not legit or why they change their name once a year. I would love to see the council do something but everytime people raise concerns its ignored.</p> <p>This policy is a good step forward but its not enough and far too late because these businesses are already set up</p> <p>I look forward to getting another empty response,</p>	
12 (resident)		<p>Please accept this email in support of the proposed Palmers Green CIZ.</p> <p>The number of ethnic cafes and bars that have recently opened in the area has had a negative impact on the local area and community, with visitors coming from other areas to these establishments. This has resulted in significant increase of anti-social behaviour incidents, pollution and parking issues. This once thriving and pleasant to live area has become a dangerous and unattractive place. A lot of long term residents have now started to look for ways to relocate and leave the area.</p> <p>Me and my family look forward to the introduction of the CIZ which we all hope would have a positive impact on our quality of life.</p>	<ul style="list-style-type: none"> <li>• Support for the new proposed CIZ in Palmers Green.</li> </ul> <p>Amendments made.</p>
13. (resident)		<p>Please accept this email in support of the proposed Palmers Green CIZ.</p> <p>The number of ethnic cafes and bars that have recently opened in the area has had a negative impact on the local area and community, with visitors coming from other areas to these establishments. This has resulted in significant increase of anti-social behaviour incidents, pollution and parking issues. This ones thriving and pleasant to live area has become a dangerous and unattractive place. A lot of long term residents have now started to look for ways to relocate and leave the area.</p> <p>Me and my family look forward to the introduction of the CIZ which we all hope would have a positive impact on our quality of life.</p>	<ul style="list-style-type: none"> <li>• Support for the new proposed CIZ in Palmers Green.</li> </ul> <p>Amendments made.</p>
14. (resident)		<p>Please accept this email in support of the proposed Palmers Green CIZ.</p> <p>The number of ethnic cafes and bars that have recently opened in the area has had a negative impact on the local area and community, with visitors coming from other</p>	<ul style="list-style-type: none"> <li>• Support for the new proposed CIZ in Palmers Green.</li> </ul>

	<p>areas to these establishments. This has resulted in significant increase of anti-social behaviour incidents, pollution and parking issues. This ones thriving and pleasant to live area has become a dangerous and unattractive place. A lot of long term residents have now started to look for ways to relocate and leave the area.</p> <p>Me and my family look forward to the introduction of the CIZ which we all hope would have a positive impact on our quality of life.</p>	<p>Amendments made.</p>
<p>15. (resident)</p>	<p>I am an enfield resident (born in enfield) and have been living in Winchmore hill/Palmers green area for the last 12 years.</p> <p>I understand that Enfield Council is currently reviewing its Licensing Policy Statement, and although i have never written to the council or government in the past I felt compelled to do so on this occasion.</p> <p>The decline of Enfield particularly palmers green high street and aldermans hill, even in the last 5 years is astonishing. This is even with an action group which is working hard and actively trying its best to improve the area.</p> <p>Long Established and family friendly businesses are failing at an alarming rate, any new interest from legitimate businesses are not welcome due to landlords letting their properties to cafe/bars/lounges all of the same ilk.</p> <p>Myself and many of my friends are considering moving out of the area in the next year as the balance has just tipped too far now. These cafes and bars are mainly empty all day apart from a couple of men that sit and smoke outside.</p> <p>What is going on? Although everyone knows what is going on but are unable to verbalise it.</p> <p>Why should we continue to pay a fortune to live in these so called desirable roads when this is what we have on our door step - providing nothing to the local hardworking families in the area. There is an over concentration and every empty unit turns in to the same thing it's disheartening and very depressing for us that live here - there appears to be no limit.</p> <p>We were hoping 5 years ago Palmers green was up and coming instead it's rapidly declining. Action needs to be taken otherwise you will have a mass exodus and will be left with a ghost town in all the main streets in enfield as hardworking tax paying families will move away from the borough and you will be left with empty</p>	<ul style="list-style-type: none"> <li>• Support for the new proposed CIZ in Palmers Green.</li> </ul> <p>Amendments made.</p>

		<p>cafe/bar/lounges.</p> <p>Thank you in advance for considering our feedback.</p>	
15. (resident)		<p>I'm looking into this: <a href="https://www.enfield.gov.uk/consultations/licensing-policy-statement">https://www.enfield.gov.uk/consultations/licensing-policy-statement</a></p> <p>I am interested in the bowes area and the impact this can have. The Green lanes area has been swamped by anti social "coffee shops" with men drinking all day and gambling inside.</p> <p>I would like to know what this is going to do with places that already have licenses even though they had complaints?</p>	<ul style="list-style-type: none"> <li>• Support for the new proposed CIZ in Palmers Green and Bowes.</li> </ul> <p>Amendments made.</p>
16. (resident)		<p>To whom it may concern,</p> <p>I write to you with regards to Enfield Council's Licensing Policy. I have a number of concerns that I would like to be taken into account. Please see my comments below.</p> <ol style="list-style-type: none"> <li>1. Risk and harm to women &amp; public safety: This should be of utmost importance at ALL times of the day and night. I am deeply concerned about the over-concentration and ever-growing number of the same type of cafe bar establishments in the borough (e.g. Southgate, Palmers Green, Winchmore Hill). These cater almost exclusively to males, and as a woman I am sad to say that it has become incredibly intimidating to walk down the local high street. Being leered at by the men in/outside these cafes isn't something that women should have to tolerate and the licensing policy must reflect this. Such establishments should be more closely vetted and subsequently monitored by the council. Licenses should be refused and/or measures put in place where necessary. Furthermore, thorough assessment should be conducted to ensure that new licenses are granted to legitimate businesses, that are INCLUSIVE, diverse, and add genuine value to the local area.</li> <li>2. Antisocial behaviour and public nuisance: In recent years we have seen a marked increase in anti-social behaviour in the borough. Much of this is concentrated around the aforementioned cafes as well as some pubs and restaurants. Loitering, littering, excessive noise, and illegal parking (blocking roads and/or pavements) for example, have become commonplace. The council should introduce a simple and ANONYMOUS reporting system where residents can securely report incidences.</li> </ol>	<ul style="list-style-type: none"> <li>• Support for the new proposed CIZ in Palmers Green and Bowes.</li> </ul> <p>Amendments made.</p>

		<p>Continuous and repeated offending should be investigated by the council, and measures put in place/licenses revoked as necessary. This is especially important in residential areas and near schools.</p> <p>3. Traffic congestion and illegal parking: Dangerous and illegal parking has become a significant issue outside cafes, as well as outside certain pubs and restaurants in the area. This is causing increased congestion, noise and anti-social behaviour (e.g. beeping horns and road rage). Licensing should take into account whether high streets have sufficient parking to accommodate the patrons of so many cafes etc. In locations where there is persistent offending, measures should be taken to issue penalties to individuals and the council should investigate the source of the problem. Establishments should be held responsible if their patrons consistently park illegally (e.g. fines, limiting or revoking licenses).</p> <p>4. Inclusive Operation of Venues: The arrival of these cafes, has contributed to the decline of our previously diverse, inclusive, and vibrant high streets and has created an unwelcoming and intimidating environment for other community members. Legitimate businesses and genuine customers are avoiding the area. Venues should be encouraged to adopt inclusive practices that promote diversity, welcoming patrons from all ages, genders and backgrounds.</p> <p>5. The proposed introduction of two new Cumulative Impact Zones in Bowes and Palmers Green: The link on the <a href="#">Enfield.gov</a> website for the Cumulative Impact Zones Review Document is broken, so I have not been able to read this. Could you please email me a working link?</p> <p>Please let me know if you have any questions. Thank you for taking the time to receive my feedback and I look forward to hearing from you in due course.</p>	
17. (charity)		<p>The only thing I would suggest maybe is expanding on the proactivity of women's safety to something about challenging perpetrating behaviours/holding those perpetrating VAWG accountable in a safe manner. And/or something about victim/survivor being provided with support (leaving this open to mean a multitude of things, e.g., a safe space). Everything else looks good to me.</p>	<ul style="list-style-type: none"> <li>Additional wording in Section L on page 27 has been added. As follows: 11.42 We expect all licensed premises to build an atmosphere of transparency and safety for women who work at night and engage in leisure in the licensed trade. This may include challenging behaviour that</li> </ul>



			<p>enables intimidation and violence against women in the licensed trade and providing support to those that experience these behaviours in licensed premises. Training for staff to support this is recommended.</p>
<p>18. (Councillor)</p>		<p>Please find my comments on the policy consultation. As an elected member I would have expected to be explicitly invited to comment but I have not found a member who was aware of this important consultation. I therefore request an extension to the consultation period.</p> <p>I have read the policy and I am specifically interested in cumulative impact areas. I am led to believe Aldermans Hill and Green Lanes are the subject of potential new areas to be included. The map I have seen is the area I am concentrating upon</p> <p>The consultation document states,</p> <p>'Proposed additional Cumulative Impact Zones It is the view of the Licensing Authority and of a number of Responsible Authorities that the areas marked on the map below in Palmers Green and Bowes are demonstrated to have a sufficient level of cumulative impact (in terms of violence, public order and criminal damage) due to the sale, supply and consumption of alcohol that Cumulative Impact Zones should be established in these areas.'</p> <p>Data attached in the consultation document support the above proposal.</p> <p>Recent licence applications on Aldermans Hill have received negative comments from residents as a result of; Concerns on crime and disorder arising from businesses in a clustered area which provide alcohol. Public safety arising from spillage onto outside pavement areas including smoking on the pavement. Public nuisance from increased noise and cars taking up parking space. Children being exposed to increased number of alcohol based premises.</p>	<ul style="list-style-type: none"> <li>• Support for the new proposed CIZ in Palmers Green and Bowes.</li> </ul> <p>Amendments made.</p>

		<p>As a result I believe that establishing a new cumulative impact zone would enhance the objectives of the licensing authority</p> <p>In addition businesses need to encourage local resident use of areas and enhance the area. If clustering of one type of business takes place this is not likely to enhance an area as the diversity of retail offer diminishes. Residents want safe, encouraging sustainable business which create a welcoming area. Using a cumulative impact zone is a way to presume a diversity of offer and minimise the downside of a single type.</p>	
19. (Councillor)		<p><b>Support for Addition of Palmers Green to CIZ for Alcohol Sales</b> I fully support the addition of Palmers Green to the CIZ for alcohol sales. Highfield residents routinely raise concerns about antisocial behaviour on/around Green Lanes resulting from alcohol and also drug use. Associated crime is also a significant problem in this area. Domestic burglaries, car theft and shop theft being the main issues. Additional considerations in place for the management of alcohol sales in this area would go some way to alleviate these problems.</p>	<ul style="list-style-type: none"> <li>• Support for the new proposed CIZ in Palmers Green and Bowes.</li> </ul> <p>Amendments made.</p>
20. (resident)		<p>I would like to stress my concern regarding the changed landscape of Enfield under the current administration and licensing team. I have been overwhelmed, as a woman, by the preponderance of male only cafes en masse, consuming the borough of Enfield. It is no longer a safe space for women and we have had to change our shopping habits and leisure activities, in an attempt to stay safe. Outdoor seating has exacerbated the intimidation women feel. Ashfield parade is a no go area as is Southgate high street, with men at castle coffee leering at school girls as they wait at the bus stop. I have requested reported incidents of harrassments at these places, under the freedom of information act, from the police; the statistics received and in double digits - and these are just the incidents reported - are firmly on the shoulders of Enfield licensing who have allowed this to occur. Enfield is no longer inclusive and with unchecked and unlicensed HMOs, also a consequence of current council inaction, the borough is predominantly male and anti female. The high streets are no longer vibrant and varied, nor do they welcome families. Enfield council have filled our high streets with barbers, betting shops and male only cafes. As a woman I feel isolated and uncomfortable and have been sexually harassed five times this year, walking down an Enfield high street. This does not happen to me in other borough's well planned and family orientated high streets. Enfield licensing processes and inaction and lack of strategy have left me vulnerable.</p>	<ul style="list-style-type: none"> <li>• Support for the new proposed CIZ in Palmers Green and Bowes.</li> </ul> <p>Amendments made.</p>



# Gambling Policy

## Statement of Licensing Policy consultation responses

Submitter	Section	Submission comment	Response comment
1. (organisation)	General	Many thanks for including the United Council of Racecourse Bookmakers in your circulation of Gambling Principles Statement for Enfield Council, we represent the on-course bookmaking sector and are satisfied with the content of your proposed document.	<ul style="list-style-type: none"> <li>No amendment needed</li> </ul>
2. (resident)	General	Over the years there have been many applications for gambling venues in Enfield town. Previously slots have always been turned down on the basis that there are so many schools in the area. What changed. Please don't grant any more.	<ul style="list-style-type: none"> <li>The Local Area Profile did not indicate a high enough need/risk in terms of vulnerability to young people in the Enfield Town area to justify additional measures.</li> </ul>
3. (Councillor)		<p><b>In addition I support the comments of Cllr Steven's re gambling.</b></p> <p><b>Proposed Addition of Palmers Green to Enfield Gambling Vulnerability Area</b></p> <p>There is a rationale for adding Palmers Green to the Enfield Gambling Vulnerability Area outlined as follows:</p> <ul style="list-style-type: none"> <li><b>Palmers Green has deprived individuals and families living in the area and the High Street (Green Lanes) is a destination for residents from a wider catchment. There are deprived residents living in the area.</b></li> <li><b>Palmers Green has been targeted by gambling companies.</b> One slot machine venue has sadly been followed up by an application for another. There are betting shops in addition and more gambling venues may be applied for. As things stand residents and their representatives have limited capabilities to resist any proliferation of applications..</li> </ul>	<ul style="list-style-type: none"> <li>The proposal to add Palmers Green to the Gambling Vulnerability Area is unfortunately not supported by the evidence of either vulnerability or gambling premises concentration in that area.</li> <li>The Palmers Green Area has a number of gambling premises, but not in the same numbers as the areas covered by the Gambling Vulnerability Area. Palmers Green is also in the lower vulnerability range for mental health and wellbeing, Index of Multiple Deprivation, unemployment rates and receipt of Universal Credit. Palmers Green and Bowes may well be areas to observe and to reassess prior to the republishing of the Gambling Policy in three years time.</li> </ul>
4. (Councillor)		<p>Dear licencing,</p> <p>Thankyou for sharing these updates on the updated licencing policy</p>	<ul style="list-style-type: none"> <li>Support for the Gambling Vulnerability Area.</li> <li>The proposal to add Palmers Green to the Gambling Vulnerability Area is unfortunately</li> </ul>

		<p>for members to review. On the whole I support the updates, in particular, as Highfield Councillor, the inclusion of Palmers Green in Enfield's listed Cumulative Impact Zones (CIZ) for alcohol sales. I would additionally suggest however that there is rationale for including Palmers Green in Enfield Gambling Vulnerability Area.</p> <p><b>Support for Creation of Enfield Gambling Vulnerability Area in Eastern Corridor</b></p> <p>I fully support officers' proposal to create the Enfield Gambling Vulnerability Area in the areas indicated along the Hertford Road / Fore Street eastern corridor, corresponding to areas with highest deprivation. It has been a source of concern to see gambling establishments, particularly slot machine venues, proliferate in Enfield in recent years. It's clear looking at where they are situated that gambling companies deliberately target deprived neighbourhoods, where they can get the most custom by exploiting vulnerable individuals on low incomes.</p> <p><b>Proposed Addition of Palmers Green to Enfield Gambling Vulnerability Area</b></p> <p>There is a rationale for adding Palmers Green to the Enfield Gambling Vulnerability Area outlined as follows:</p> <ul style="list-style-type: none"> <li>• <b>Palmers Green has deprived individuals and families living in the area.</b> They are however masked in the statistics shown in the maps by affluent neighbours. There are high economic inequalities within the ward to making decisions based on averaged for the population means economically vulnerable individuals lose out.</li> <li>• <b>Palmers Green has been targeted by gambling companies.</b> One slot machine venue has sadly been followed up by an application for another. These will be situated next to multiple betting shops (not dissimilar to where I live in Enfield Wash). These companies would not be looking to slot machines in Palmers Green if there was not a sufficient population of vulnerable people on low incomes to provide customers.</li> </ul>	<p>not supported by the evidence of either vulnerability or gambling premises concentration in that area.</p>
--	--	---	---

		<ul style="list-style-type: none"><li>• <b>Highfield residents have raised concerns about the proliferation of gambling venues in Palmers Green.</b> This will inevitably have a detrimental impact on local vulnerable families and associated crime for all residents. A substantial number raised objections to the application for a second slot machine venue, both writing to the council and passionately in-person at Ward Forums.</li></ul>	
--	--	--	--

## Recommended changes and amendments in response to the consultation

### Licensing Policy

#### *Recommended changes and amendments in response to the consultation*

Section	Change	Reference in policy
<b>Cumulative Impact Zones: Times</b>	Address concerns re an accumulation of licensed premises operating in the day time by removing the core hours for the CIZs so the CIZs operate at all hours.	Section J: Page 25
<b>Cumulative Impact Zones: Conditions</b>	Address issues relating to public nuisance caused by blocking of footpaths and concerns re intimidation of women – by creating new model conditions for CIZ areas. Additional model conditions: <ul style="list-style-type: none"> <li>• training of staff relating to protection of women, girls and vulnerable people,</li> <li>• designation of smoking area, and</li> <li>• entry and exit of premises.</li> </ul>	Appendix 9: Page 57 & 58.
<b>Violence against Women and Girls</b>	Additional wording in Section L on page 27 has been added. As follows: 11.42 We expect all licensed premises to build an atmosphere of transparency and safety for women who work at night and engage in leisure in the licensed trade. This may include challenging behaviour that enables intimidation and violence against women in the licensed trade and providing support to those that experience these behaviours in licensed premises. Training for staff to support this is recommended.	Section L: Page 27

## **Gambling Policy**

No changes are recommended to the Gambling Policy as a result of the consultation.

In particular the proposed inclusion of Palmers Green into the Gambling Vulnerability Area is not supported by the evidence in the Local Area Profile. The Palmers Green Area has a number of gambling premises, but not in the same numbers as the areas covered by the Gambling Vulnerability Area. Palmers Green is also in the lower vulnerability range for mental health and wellbeing, Index of Multiple Deprivation, unemployment rates and receipt of Universal Credit. Palmers Green and Bowes may well be areas to observe and to reassess prior to the republishing of the Gambling Policy in three years time.