

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 17th of May 2024 to the 12th 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.

Section 1: Statement of Licensing Policy – Licensing Act 2003

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"> • Support for the new proposed CIZs. • Support overall for the Licensing Policy <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"> - loitering in groups and blocking pavements for passers by - smoking and drinking on the pavements and spilling into Broomfield Park - openly discarding rubbish and cigarette butts on the pavements and roadsides - parking illegally on double yellow lines and across residents drives - leering at passing women - unwelcoming and overpowering behaviour towards passers by 	<ul style="list-style-type: none"> • Support for the new proposed CIZ in Palmers Green. <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 Caffè 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>	<ul style="list-style-type: none"> • 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. • Section L: Violence Against Women and Girls, and Section
--	--	---	---

		<p>Behavioural Conduct: Introduce policies that mandate licensed premises to actively discourage and report any menacing or discriminatory behaviour observed outside 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 Pavement Licence (Business & Planning Act 2020)</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"> • It is not possible to do this under the Licensing Act 2003, other than via cumulative impact which does not differentiate between business types. • 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. • The Licensing Policy clearly indicates a requirement to abide by all other regulations and legislation, particularly on smoking.
--	--	--	---

		<p>Enforcement and Accountability: Clearly outline the council's approach to enforcing 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>	<ul style="list-style-type: none"> Section G: Enforcement outlines the Council's approach to enforcement.
4.(resident)	Cafes, VAWG, Entry and Exit, CIZs	<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 & 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"> Support for the new proposed CIZ in Palmers Green. <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</p>	<ul style="list-style-type: none"> Support for the new proposed CIZ in Palmers Green. <p>Amendments made.</p>

		<p>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 furniture store across the road.</p> <p>Surely businesses could be advised on keeping in with the period feel or get advice on acceptable design?</p> <p>There should be a focus on attracting national businesses to open branches as well as more independent shops.</p> <p>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.</p> <p>Southgate is being destroyed.</p>	<ul style="list-style-type: none"> • Support for the new proposed CIZ in Palmers Green. <p>Amendments made.</p>
7. (resident)		<p>Response to Public Licensing Consultation</p> <p>Growing Numbers of Cafe Bars 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>Loitering 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>Inclusive Operation of Venues 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>Lack of Community Engagement</p>	<ul style="list-style-type: none"> • Support for the new proposed CIZ in Palmers Green. <p>Amendments made.</p>

		<p>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 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"> • Support for the new proposed CIZ in Palmers Green. <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 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>	<ul style="list-style-type: none"> • Support for the new proposed CIZ in Palmers Green. <p>Amendments made.</p>
10. (resident)		<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>	<ul style="list-style-type: none"> • Support for the new proposed CIZ in Palmers Green. <p>Amendments made.</p>

		<p>I employ you to see sense and not keep giving licenses to yet more of the same cafes/bars.</p>	
<p>11. (resident)</p>		<p>I would like to write to you about the have your say policy here: https://www.enfield.gov.uk/consultations/licensing-policy-statement</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: https://www.bbc.co.uk/news/articles/c04x9m4jzvm0</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 https://find-and-update.company-information.service.gov.uk/company/09856182/filing-history</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: 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.</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>	<ul style="list-style-type: none"> • Support for the new proposed CIZ in Palmers Green. <p>Amendments made.</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 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"> • Support for the new proposed CIZ in Palmers Green. <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"> • Support for the new proposed CIZ in Palmers Green. <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 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"> • Support for the new proposed CIZ in Palmers Green. <p>Amendments made.</p>
15. (resident)		<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>	<ul style="list-style-type: none"> • Support for the new proposed CIZ in Palmers Green. <p>Amendments made.</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 cafe/bar/lounges.</p> <p>Thank you in advance for considering our feedback.</p>	
15. (resident)		<p>I'm looking into this: https://www.enfield.gov.uk/consultations/licensing-policy-statement</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"> • Support for the new proposed CIZ in Palmers Green and Bowes. <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"> 1. Risk and harm to women & 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. 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 	<ul style="list-style-type: none"> • Support for the new proposed CIZ in Palmers Green and Bowes. <p>Amendments made.</p>

		<p>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. 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 Enfield.gov 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"> • 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

			<p>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.</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.</p>	<ul style="list-style-type: none"> • Support for the new proposed CIZ in Palmers Green and Bowes. <p>Amendments made.</p>

		<p>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> <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>Support for Addition of Palmers Green to CIZ for Alcohol Sales 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"> • Support for the new proposed CIZ in Palmers Green and Bowes. <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 harrasments 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 on,y cafes. As a woman I feel isolated and uncomfortable and have been sexually harassed five times this</p>	<ul style="list-style-type: none"> • Support for the new proposed CIZ in Palmers Green and Bowes. <p>Amendments made.</p>

		<p>year, walking down an Enfield high street. This does not happen to me in other borough's well planned and family orientated high streets.</p> <p>Enfield licensing processes and inaction and lack of strategy have left me vulnerable.</p>	
--	--	--	--

Section 2: Statement of Licensing Principles – Gambling Act 2005

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"> No amendment needed
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"> 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.
3. (Councillor)		<p>In addition I support the comments of Cllr Steven's re gambling.</p> <p>Proposed Addition of Palmers Green to Enfield Gambling Vulnerability Area</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"> 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. Palmers Green has been targeted by gambling companies. 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.. 	<ul style="list-style-type: none"> 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. 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.
4. (Councillor)		Dear licencing,	<ul style="list-style-type: none"> Support for the Gambling Vulnerability Area.

		<p>Thankyou for sharing these updates on the updated licencing policy 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>Support for Creation of Enfield Gambling Vulnerability Area in Eastern Corridor 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>Proposed Addition of Palmers Green to Enfield Gambling Vulnerability Area There is a rationale for adding Palmers Green to the Enfield Gambling Vulnerability Area outlined as follows:</p> <ul style="list-style-type: none"> • Palmers Green has deprived individuals and families living in the area. 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. • Palmers Green has been targeted by gambling companies. 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. 	<ul style="list-style-type: none"> • 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.
--	--	--	--

		<ul style="list-style-type: none">• Highfield residents have raised concerns about the proliferation of gambling venues in Palmers Green. 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.	
--	--	--	--

Section 3: 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
Cumulative Impact Zones: Times	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
Cumulative Impact Zones: Conditions	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"> • training of staff relating to protection of women, girls and vulnerable people, • designation of smoking area, and • entry and exit of premises. 	Appendix 9: Page 57 & 58.
Violence against Women and Girls	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.