

# IAS response to UK government Licensing Reforms Programme – Call for Evidence

**November 2025**

## **5. National Licensing Policy Framework**

Our aim is to create a balanced licensing system that supports wider national and regional policies.

The Licensing Taskforce recommended that government "establish a National Licensing Policy Framework to harmonise licensing practices across authorities while preserving local discretion. It would align licensing with broader government goals — economic growth, cultural development and public safety — without requiring primary legislation. Delivered via licensing circulars, it would reduce regulatory burdens, improve consistency, and support fairer decision-making."

### **What is a National Licensing Policy Framework**

The Licensing Act 2003 establishes the legal framework for alcohol, entertainment and late-night refreshment licensing in England and Wales. The statutory guidance offers detailed advice to licensing authorities on interpreting and applying the Act.

The proposed National Licensing Policy Framework (NLPF) would help deliver a balanced licensing system that reflects the original intent of the licensing framework, for example:

- giving business greater freedom and flexibility to meet customers' expectations
- greater choice for customers, including tourists, about where, when and how they spend their leisure time
- encouraging more family-friendly premises where younger children can go with their families
- further development within communities of our rich culture of live music, dancing and theatre
- the regeneration of areas that need the increased investment and employment opportunities that a thriving and safe night-time economy can bring
- the necessary protection of local residents, whose lives can be blighted by disturbance and anti-social behaviour associated with some people visiting licensed premises

In addition, the NLPF will help to harmonise licensing practices across local authorities while preserving local discretion. It would sit alongside the Licensing Act 2003 and the statutory guidance, providing national direction to support consistency,

transparency and alignment with broader government goals such as economic growth, enhancing cultural representation, high street resilience and improving public health and wellbeing.

The Government envisages that the overarching objective of any NLPF would be to establish a consistent, transparent, and strategically aligned licensing system that empowers local authorities while supporting national goals for economic growth, cultural development, public safety, and community health and wellbeing.

**7. Do you agree or disagree with the overarching objective of a consistent, transparent licensing system which empowers local authorities while promoting economic growth, cultural development, public safety and community wellbeing? \***

Agree

**Disagree**

Don't know

Prefer not to say

**Please explain your answer (text box)**

The creation of a *National Licensing Policy Framework* that could centrally guide or overrule local licensing decisions would weaken the role of local authorities and contradict the Government's stated commitment to localism and devolution. The consultation does not explain how this Framework would operate, who would govern it, or how it would be held accountable to local people.

The primary purpose of the licensing system should remain the reduction of harm and public protection and the empowerment of local decision-makers to manage alcohol's impact in their areas. There is already a well-established and regularly updated system of statutory guidance underpinning the Licensing Act (2003). The current model enables licensing decisions to be informed by local data, the expertise of Responsible Authorities, and public consultation. Its flexibility and responsiveness to local needs were among the Act's key strengths when introduced. There are issues with the Act, but these proposals will make the licensing system worse, not better.

These proposals run counter to other important Government objectives, including creating healthier communities, tackling preventable illness, making neighbourhoods safer, reducing violence against women and girls, and empowering residents to shape their local environments.

If the Government wants to revitalise town centres and invest in prevention, it must strengthen – not weaken – local authority powers to act on local evidence and need. Alcohol harms are pervasive across England and Wales, contributing to mental ill-health, chronic disease, workplace absence, injuries, violence, and record-high alcohol-related deaths.<sup>1</sup> A centralised licensing framework would only make it harder for communities and their elected representatives to reduce this harm.

Transferring responsibility for licensing to local authorities was one of the key democratic advances of the 2003 Act.<sup>2</sup> Reintroducing central control would reverse this progress and contradict the Government’s own stated aim of avoiding “micromanagement from the centre.”<sup>3</sup>

It is also concerning that the proposal appears to have been developed with little input from the police, ambulance services, local licensing authorities or public health practitioners – those who must deal with the consequences of alcohol harm every day.

Embedding “economic growth” as a licensing objective would directly conflict with the core public protection aims of the Licensing Act and its Section 182 guidance. No explanation has been provided for how such conflicts would be managed.

The licensing system already provides a highly permissive environment, with the majority of applications approved. Adding economic growth as an objective would change the fundamental nature of licensing – transforming it from a protective system into a promotional one – without full legislative scrutiny or reform.

Including “economic growth” as a statutory objective would:

- Make it harder for licensing authorities to restrict alcohol sales in shops or online and for local residents to object to harmful applications.
- Limit authorities’ ability to impose conditions that curb irresponsible promotions or manage late-night sales.
- Increase the administrative and legal burden on licensing committees through more appeals and conflicting objectives.

Although the consultation refers primarily to on-trade premises, the new objective would inevitably extend to the off-trade. Without major legislative change, it would be impossible to distinguish between them in law. Yet these proposals do nothing to address the imbalance between the on- and off-trade or to encourage people to choose pubs, restaurants, theatres and community venues over home drinking.

Instead, they risk further advantaging large supermarket chains and alcohol retailers, undermining independent businesses and efforts by local authorities to diversify the night-time economy beyond alcohol.

Evidence also suggests that longer opening hours do not deliver the intended economic benefits. Research on extended hours in Glasgow found that while some

venues saw small gains, many experienced higher levels of violence, excessive intoxication, or financial losses due to staffing costs.<sup>4</sup>

Consumer demand for late-night alcohol sales has been declining for years. The primary driver of reduced on-trade drinking is the growing availability of cheap alcohol in the off-trade – where affordability has tripled since 1988.<sup>5</sup> In England, it costs as little as £5.25 to buy 18.8 units of alcohol – more than a week’s worth under the Chief Medical Officers’ low-risk guidelines.<sup>6</sup> Making licences easier to obtain for shops and delivery warehouses would only increase outlet density, intensify competition, and drive prices lower still.

Greater alcohol availability will not fuel sustainable economic growth. It will fuel growth in alcohol-related crime, hospital admissions, chronic illness, and lost productivity. Neither the Taskforce nor the Government response has addressed the economic consequences of increased alcohol consumption. In 2022, alcohol-related harm cost the English economy at least £27.44 billion annually, with approximately £5.06 billion attributed to lost productivity.<sup>7</sup> This includes costs from absenteeism, presenteeism, and workplace accidents. A 2025 IPPR report found that nearly one in three UK workers have called in sick after drinking at work events, and many report working while hungover, leading to decreased performance and increased errors.<sup>8</sup> Reducing alcohol consumption could alleviate these economic burdens, enhance workforce productivity, and support sustainable economic growth.

We agree that the Licensing Act (2003) requires review, particularly to address the off-trade, online sales, and rapid delivery models. However, introducing a centralised framework and an economic growth objective is not the solution. Reform should aim to modernise the system to better protect health, safety and community wellbeing – not dilute local accountability or prioritise commercial interests over public protection.

## 8. Do you agree or disagree that promoting economic growth should be a statutory licensing objective alongside the existing public safety objectives?

**A statutory objective is one that is defined in law and that licensing authorities are required to consider. \***

Agree

**Disagree**

Don't know

Prefer not to say

**9. Do you think that the licensing regime should treat on-trade and off-trade premises differently in any respects in order to allow the differing challenges and opportunities they pose to be addressed? \***

**Yes**

No

Don't know

Prefer not to say

**Please explain your answer: (text box)**

The licensing system should treat on-trade and off-trade premises differently, as they present fundamentally different risks and challenges. In its response to the Taskforce report, the Government rightly said that “the growth in drinking in unregulated spaces is a concern”, yet none of the proposals seek to address the rise in off-trade alcohol sales and consumption, and none will help shift drinking back to the on-trade.

The current Licensing Act (2003) covers both on- and off-trade premises under a single framework. The Taskforce and Government’s proposals do not explain how these could be effectively separated without substantial legislative reform. However, we believe such reform is needed. The time has come to develop a distinct system for off-sales premises – including remote and online sales – that reflects their unique contribution to alcohol harm and the limitations of the existing regime.

Alcohol-related harm in England and Wales is at record levels. Millions experience the negative consequences of alcohol, including physical and mental ill-health, anti-social behaviour, violence, and premature death. A modernised, more sophisticated licensing framework is needed – one that can respond proportionately to where harms are most concentrated without unnecessarily restricting venues that pose lower risks. Neither the existing Act nor the current reform proposals achieve this balance.

Responsibility for the governance of off-trade sales should be moved into a separate regime, informed by public health expertise at both local and national levels. This would ensure that decisions about licensing, pricing, and promotion reflect the significant health and social impacts of alcohol sold through the off-trade.

The Act should also be updated to regulate and restrict remote sales of alcohol – those made online, via apps, or through rapid home delivery services. These have increased sharply since the COVID-19 pandemic and pose particular challenges for age verification, availability control, and local oversight. A national framework for remote sales should go beyond existing work on age-checking to consider their overall contribution to alcohol availability, harm, and the undermining of local cumulative impact policies.

Alcohol availability in England and Wales is already extensive. On 31 March 2024, there were 171,410 licensed premises – 37,126 for on-sales only, 53,418 for off-sales only, and 80,866 for both.<sup>9</sup> The average English postcode has 31 outlets selling alcohol within one kilometre of its centre.<sup>10</sup> Most alcohol purchased in the UK now comes from supermarkets (87%), while 51% of people report buying alcohol in pubs or bars and 35% in restaurants.<sup>11</sup>

On-trade and off-trade premises clearly operate under different conditions and drive different kinds of harm. Alcohol sold in the off-trade – such as supermarkets, corner shops, and online retailers – is consistently associated with greater risk.<sup>12</sup> When on-trade premises were closed during the COVID-19 pandemic, the proportion of alcohol-related violence fell only slightly (from 15.5% to 12.8%), and there was no notable reduction in alcohol-related domestic violence.<sup>13</sup> This suggests that off-trade alcohol plays a major role in sustaining violence, including domestic violence.

Off-trade alcohol has also become significantly more affordable and accessible than on-trade alcohol over the past three decades.<sup>14</sup> It is often sold at very low prices, available around the clock, and consumed in unsupervised environments such as the home or public spaces.<sup>15 16 17</sup> People tend to pour larger measures when drinking at home,<sup>18</sup> and this setting is strongly associated with domestic abuse and child neglect.<sup>19</sup> The Home Office has found that alcohol is a factor in nearly half of intimate partner homicides – evidence that the harms linked to home drinking cannot be ignored.<sup>20</sup> Yet it remains a “blind spot” in alcohol harm reduction policy.<sup>21</sup>

If the Government wishes to make communities safer and healthier, the licensing regime must be rebalanced to reflect these realities. Creating a separate, health-informed framework for off-trade and remote sales would allow for proportionate, targeted regulation of the areas where harm is greatest – while supporting the continued role of pubs, restaurants and community venues as safer, supervised environments for social drinking.

## 10. What priority themes should be included in a National Licensing Policy Framework? \*

### Public safety and Crime Prevention

Economic Growth and Reducing Business Burdens

### Culture & Community Cohesion

### Community Health and Wellbeing

Supporting Growth, Highstreets and Night-Time Economies

Others

### List any other themes for inclusion: (text box)

We do not support the proposal to introduce a National Licensing Policy Framework. The Licensing Act is clear that its objective is to protect the public. This is accompanied by statutory guidance, which is reviewed regularly. The framework by which local licensing authorities should make decisions is already set out in this legislation and statutory guidance. Any priorities for licensing decisions should reflect the licensing objectives. If these priorities are to be amended, this should be done via full legislative reform and scrutiny. This process would also ensure that any changes or expansions to licensing objectives are in keeping with the overarching aims of The Licensing Act, and complement (rather than conflict) with all of its existing elements.

### 11. How could the government assess whether national guidance is working effectively?

Please suggest ways we could measure if national guidance is making a positive difference.

Growth in the size of the sector and number of businesses

Lower rates of crime and ASB

Lower rates of alcohol-related harm

Fewer people appeal decisions

Other (please tell us below)

### Comment: (text box)

Licensing has a protective purpose. We are concerned with the suggestion in this question that fewer appeal decisions would be a measure of success. Introducing this as an indicator could incentivise authorities to approve licences that they might otherwise refuse, for fear of an increase in their appeals statistics. Licensing authorities are already under-resourced to fight appeals against large, well-funded retailers. Such a metric would create a 'chilling effect' by which local teams would be reluctant to refuse applications, even where there is evidence that they would negatively impact the licensing objectives.

### 6. Licensing Condition Amnesty

The government's aim is to modernise and streamline licences for on-trade premises.

## What is an amnesty on licensing conditions?

Most premises licences are granted indefinitely and include conditions that were considered reasonable and proportionate at the time they were added to the licence. There is an established process for licence holders to request amendments or removal of these conditions.

Some of these conditions are treated as minor variations, small changes that do not significantly impact licensing objectives, and are typically subject to a light-touch review. However, some are treated as major variations, which are more significant changes, e.g. extending alcohol trading times, that require a more comprehensive review, equivalent to a new licence application. There is potentially some inconsistency across licensing areas as to what constitute major and minor variations and business owners are therefore reluctant to request any changes to their premises licences, including redundant licence conditions, in case it triggers a full licence review.

An amnesty would recognise that many licensing conditions—particularly those inherited from pre-2005 regimes—may no longer be relevant or proportionate and therefore the removal of which should be treated as minor variations. Importantly, an amnesty would operate within existing legislative powers and would not require new laws. The amnesty would not allow for blanket removal of conditions without review. It would focus on-trade premises (e.g. restaurants, bars, nightclubs), rather than off-trade premises (e.g. off-licences).

The government envisages a process whereby licence holders would be encouraged to prepare their proposed changes for discussion with their police licensing officer at the next scheduled premises visit or earlier by agreement. They would be able to take on board police advice on the appropriateness of the proposals and which of them may qualify as minor, before submitting their application to the licensing authority and advertising the proposed changes as required. Decisions must be made within 15 working days and the authority must approve the application unless it believes the changes could negatively impact the promotion of licensing objectives.

## What are minor variations?

The Licensing Act 2003 does not define minor variations, however the following changes are not considered minor:

- Extending the duration of the licence
- Substantially altering the premises
- Adding the supply of alcohol
- Permitting alcohol sales between 11pm and 7am
- Increasing the hours during which alcohol may be sold or supplied

**12. Do you agree or disagree that there should be an amnesty for licensing conditions as described above? \***

Agree

**Disagree**

Don't know

Prefer not to say

**13. What would you see as the main benefits of an amnesty? [Tick all that apply]**

Minor conditions are small changes that do not significantly impact licensing objectives.

Removing minor conditions dating prior to 2005

Removing minor conditions since 2005

Removing non-minor conditions

Reducing costs to businesses

Reducing costs to consumers

Reducing non-compliance with conditions

Encouraging better relationships between premises and authorities

Other

**None**

**If you answered 'Other' please specify: (text box)**

The question phrasing misrepresents the existing licensing regime. There are no 'minor conditions', although licence holders can apply for minor variations.

**14. What challenges do you associate with an amnesty? [Tick all that apply]**

Costs to businesses in making applications

**Costs to local government and policing in reviewing and advising on applications**

**Increased risks to public safety**

**Increased risk of noise or public nuisance**

## Increased risk of crime and disorder

## Challenges to protect children from harm

## Other

None

### If you answered 'Other' please specify: (text box)

This proposal is unclear and appears to be based on a misunderstanding of the existing licensing framework. The wording used in the consultation is incorrect: it should refer to “minor variations” – small, administrative changes that do not materially affect the licensing objectives. The current proposal confuses licensing conditions with licensing variations, which are entirely different concepts. This is a serious error, and as such, responses to this question cannot be meaningfully interpreted, nor should the proposal be progressed in its current form.

If the proposal is intended to simplify the process for making minor variations to existing licence conditions, then it misrepresents that process as an “amnesty”. An amnesty on conditions would have a far broader and more concerning effect – potentially encouraging the widespread removal of safeguards designed to prevent alcohol harm and irresponsible retail practices.

Licensing conditions are a vital tool for protecting public health and safety. They are carefully developed through consultation, evidence gathering, and local decision-making as required under the existing statutory guidance. The section 182 guidance already states that conditions should be proportionate, tailored to individual premises, and used only where necessary to promote the licensing objectives. These conditions reflect local evidence and local democratic input – both of which are essential to a well-functioning licensing system.

The success of the Cardiff Model demonstrates the value of evidence-led local interventions.<sup>22</sup> This model, which enables anonymised data-sharing between hospitals, police, and Licensing Authorities, has proven highly effective at reducing violence and improving public safety. A Home Office evaluation found that if only 5% of community safety partnerships adopted the Cardiff approach, public services could save an estimated £858 million over ten years.<sup>23</sup> Licensing conditions informed by this kind of evidence are therefore an essential component of prevention and community safety.

Many venues, particularly large, late-trading or high-risk premises, have bespoke conditions imposed through hearings or appeals. These were judged necessary by local authorities to ensure the safe management of those premises. Removing such conditions through an “amnesty” would disregard local expertise, undermine these tailored safeguards, and reduce the democratic principles of local decision-making.

It is also unnecessary. A system for amending or removing conditions already exists. Licensees can currently apply for minor variations to make small changes at a lower fee, with decisions made within 15 working days. Licensing authorities are already required to assess such requests based on their potential impact on the licensing objectives. The process is efficient, proportionate, and widely used.

An amnesty would not improve efficiency – it would likely overwhelm local authorities with a sudden surge of applications submitted simultaneously, diverting resources away from meaningful oversight and enforcement.

The justification offered for this proposal – namely that businesses are reluctant to open up their licences to “scrutiny” or “additional undertakings” – is misplaced. Democratic oversight and review are not bureaucratic burdens but essential mechanisms of accountability. Scrutiny ensures that licensing contributes to safer, fairer, and more inclusive local economies. Removing these protections to reduce administrative obligations for business would come at the expense of public safety and community wellbeing.

The Government’s suggestion that national mandatory conditions, such as those restricting irresponsible promotions, are “outdated” is also inaccurate.<sup>24</sup> These measures were introduced following the 2008 Home Office and KPMG report, which identified widespread intoxication linked to double shots as standard and the use of free-poured cocktails. Mandatory conditions such as clear pricing and responsible serving practices remain critical today, given continued evidence of heavy episodic drinking across Great Britain.<sup>25</sup> They help consumers moderate their intake and prevent harmful consumption incentives.

As outlined elsewhere in this submission, licensing authorities are already limited in their ability to refuse licence applications. Reform should therefore focus on strengthening – not weakening – the ability of local authorities to manage alcohol availability in light of changing patterns of consumption, particularly the growth in off-trade and delivery-based sales.

Although the consultation suggests that any “amnesty” would apply only to the on-trade, it is unclear how such a restriction would operate in practice. Without a clear mechanism, there is a strong likelihood that the off-trade could also seek to benefit, leading to a surge in deregulation across supermarkets, shops, and online retailers.

In summary, this proposal is both conceptually flawed and operationally risky. It conflates established licensing processes with an untested deregulation mechanism that could weaken protections, increase alcohol harm, and undermine the effectiveness of local licensing systems.

**15. It will be important to understand what counts as a minor variation when deciding what types of licence condition changes an amnesty could address.**

**Can you provide your views? What do you think would be characteristic of a minor variation? You may give examples. (text box)**

Existing Home Office guidance already outlines the kinds of variations that should be considered ‘minor’.

## **7. Statutory Notice Requirements**

Our aim is to look at ending the requirement for printed statutory notices for alcohol licences.

The Licensing Act requires that new premises licence applications or major changes to existing licences must be announced both in a local newspaper and on the premises. These statutory notices also apply to other local decisions, such as certain planning applications and road closures. The requirement to place statutory notices in printed local newspapers reflects the need to keep local people informed of decisions that may affect them but also provides a source of income for media companies. However, some licence applicants report significant and varying costs for advertising notices. This requirement applies to both on- and off-trade premises (e.g. both restaurants and bars, as well as retailers selling alcohol for consumption off the premises).

Local printed newspaper readership in England has steadily declined, with no daily titles and only five weekly titles circulating over 20,000 copies in 2024. The percentage of people accessing local news through print dropped from 23% to 9% over seven years. Conversely, the websites of these local news publishers reach around 37m people in the UK each month. Alcohol notices are commonly reproduced on these sites as well as in print. The industry has launched a Public Notice Portal, which provides a centralised and interactive resource for all types of statutory notice, with plans underway to incorporate public consultation functionality to help public bodies and commercial entities engage with the public more effectively.

The Government recognises that local journalism is vital in supporting accountability and providing reliable local information. With ongoing devolution efforts and concerns about online disinformation, the Department for Culture, Media and Sport is committed to supporting local journalism through a Local Media Strategy. Among other issues, this Strategy will include a wider review of all types of statutory notice, which will also take forward final decisions on the future of alcohol licence notices.

**16. Do you foresee any risks or benefits from removing the requirement to advertise alcohol licence notices in print local newspapers? (text box)**

Reducing the requirement for public notices risks weakening democratic accountability and community engagement in the licensing process, unless alternative arrangements are made to ensure accessibility and transparency. If notices are moved entirely online, many residents – particularly those who are less digitally connected – may be excluded from awareness and participation in local licensing decisions. It is therefore essential that any new system retains meaningful opportunities for public consultation in both digital and non-digital spaces.

Local newspapers have also raised legitimate concerns about the loss of advertising revenue from licensing notices. These notices form an important part of their income at a time when local journalism is already under significant financial strain. Removing this revenue stream could further weaken the local press, which plays a vital democratic role in keeping communities informed about decisions that affect them.

This issue also exposes a contradiction in the Government’s stated aim of promoting “economic growth” through licensing reform. While the proposed changes may benefit large businesses and national chains, they could inadvertently harm smaller, local enterprises – such as community news outlets – that rely on this income. The reforms therefore risk consolidating economic advantage among larger players while undermining the local businesses and civic institutions that help sustain healthy, informed communities.

The Taskforce report presents a selective and misleading picture of local newspaper readership. Its claim that print notices “serve no meaningful purpose” relies on a single example of one publication with low circulation (the Birmingham Post). Other examples with far higher readership could just as easily be cited. It is inappropriate to base a national policy decision on such limited evidence.

**17. What evidence do you have on the costs to business of publishing alcohol licence notices in local printed newspapers in your local area? (text box)**

**18. Do you consider the costs associated with publishing statutory notices in local media are sufficiently transparent? \***

Yes

No

**Don't know**

Prefer not to say

**19. In place of publication in print local newspapers, what alternative methods of publicising this information do you consider would be most effective in**

**ensuring effective scrutiny, transparency and public awareness of licencing activities?**

**Notices displayed in the vicinity of the licensed venue**

**Online local news websites and/or the online Public Notice Portal**

**Council websites, newsletters or social media channels**

**Other**

**If you answered 'Other' please specify: (text box)**

It is important that any replacement system for newspaper notices includes offline notices that will be easily accessible by the whole community, including older, vulnerable and disadvantaged groups who often face more barriers to online access.

## **8. Outdoor Trading and Pavement Licences**

The government's aim is to improve and simplify the current system for outdoor trading and pavement licences, removing barriers to using outdoor space while maintaining safeguards.

The government is seeking views on how the current system for outdoor trading and pavement licences operates, and how it might be improved to better support business growth whilst maintaining public safety. The Taskforce suggested some options, including to: simplify and extend pavement licence durations (e.g. minimum two years as a rule); remove outdated COVID-related conditions; clarify that alcohol in open containers (i.e. a drink poured into a glass) in licensed outdoor areas count as on-sales; promote best practice guidance to maximize outdoor trading; support seasonal flexibility; and encourage local authorities to adopt pragmatic approaches that boost economic activity.

**20. Are you answering on behalf of a business who has or has had a pavement licence or traded outdoors? \***

Yes

**No**

Don't know

Prefer not to say

**9.**

**21. How often does your organisation apply for an outdoor trading or pavement licence (on average)?**

**22. What is the primary purpose of your outdoor trading?**

**23. What barriers currently prevent you making most effective use of outdoor spaces, and do you have any recommendations to address these?**

**10.**

**24. How long do you think pavement licences should be valid for?**

**Pavement licences let businesses like cafes put tables and chairs on the street. How long should these licences last before needing renewal?\***

1 year

**2-3 years**

5 years

Permanent (with occasional reviews)

Other (please tell us below)

**Comment: (text box)**

**25. How can pavement licensing better support seasonal flexibility and temporary permissions (e.g. for music or sporting events)? (text box)**

Bespoke conditions, set by the Licensing Authority, that follow advice from the Responsible Authorities.

**26. Should alcohol in open containers (e.g. a drink poured in a glass) in pavement licence areas be treated as on-sales? \***

**Yes**

No

Don't know

Prefer not to say

## 27. Is guidance necessary to support best practice in outdoor trading? \*

Yes

No

Don't know

Prefer not to say

### Comment: (text box)

The sale and consumption of alcohol in outdoor public spaces poses challenges for public safety, including the interaction of groups between venues, road safety risks and risks of antisocial behaviour. Licensing, including specific conditions for premises, is an important tool to manage these challenges. Guidance is important but should not be considered a replacement for specific conditions for outdoor sale at licensed premises.

## 11. Temporary Event Notices (TENs)

Our aim is to make it easier for licensed premises to give notification of temporary events.

Temporary event notices (TENs) are a light touch notification process to allow for larger events or extensions to hours at premises which already have a licence. TENs are also for unlicensed premises to host an event that involves a licensable activity, but the Government is not currently consulting on any changes to those regulations.

Licensed premises can currently apply for a maximum of 15 TENs in one year for a total period of 21 days. The limit was increased during Covid, to 20 events over 26 days. This temporary increase in the number of days has since lapsed as the emergency Covid legislation is no longer in force. We are proposing permanently to increase the limit, in order to support venues hosting community events.

## 28. Do you support increasing the annual maximum number of TENs per licensed premises? \*

Yes

No

Don't know

Prefer not to say

**29. Do you agree or disagree with increasing the annual maximum number of TENs to 20 events over 26 days (the same limit that applied during Covid)? \***

Agree

**Disagree**

Don't know

Prefer not to say

**30. What benefits or risks, if any, do you foresee if the maximum number of TENs is increased? (Please provide examples or evidence where possible.) (text box)**

The maximum number was already raised from 12 to 15 in 2016 under the previous Government's Deregulation Bill. Increasing it again risks undermining the purpose of TENs as a tool for occasional and exceptional use. A further expansion would make it easier for licensed premises to circumvent the conditions of their premises licence and avoid appropriate scrutiny. The temporary increase to 20 during the pandemic should be regarded as an emergency measure, not a precedent for permanent deregulation.

While the Government's stated rationale is to support community and charitable events, in practice most TENs are used by existing licensed premises to extend or vary their operations. Westminster City Council told the House of Lords Select Committee on post-legislative scrutiny of the Licensing Act (2017) that around 85% of its 3,100 annual TENs were used to extend licensable activities at already licensed premises.<sup>26</sup> The Local Government Association gave a similar example, noting that events such as the Reading Festival generate "floods of TENs from pubs and clubs... looking to ride the wave of local business and dispense with the hours and conditions they would normally have to comply with."<sup>27</sup>

Increasing the number of TENs to 20 per year would effectively allow licence holders to spread these notices across the calendar, enabling routine extensions to opening hours without amending their licence. This would weaken the safeguards designed to prevent alcohol-related harm and disturbance.

Moreover, rather than reducing bureaucracy, this change would likely increase it. A higher number of TENs would generate more administrative work for licensing authorities, which must process the notices and handle any objections from residents or responsible authorities. This would divert already limited local authority resources without delivering meaningful community benefit.

In summary, increasing the maximum number of TENs risks undermining the integrity of the licensing system, increasing alcohol-related harm, and creating

additional administrative pressures for local authorities, while providing minimal benefit to genuine community organisers.

**31. Do you agree or disagree with retaining the 24 hour gap between temporary events at licensed premises? \***

**Agree**

Disagree

Don't know

Prefer not to say

**32. What, if any, additional safeguards or changes would be needed if the TENS entitlement were increased? (text box)**

We do not support increasing the annual limit on TENS, as it would effectively extend alcohol supply through a simplified process with less scrutiny and fewer controls than the premises licence system. It would also largely benefit existing licensed venues rather than help venues hosting community events.

If the cap is to be raised, we strongly recommend extending the current notification period of 10 working days for repeat users and commercial operators to give police and environmental health more time to assess risks. Additionally, implementing a “fit and proper” record for repeat TENS users would be wise, allowing licensing authorities to identify those with repeated poor compliance and to refuse TENS where there is a pattern of incidents, even if no formal prosecution has taken place.

**33. Do you agree or disagree that conditions placed on premises licences should automatically transfer to TENS granted to those premises?**

**Conditions placed on premises licences currently do not automatically apply to TENS. This question asks whether you think they should in future. \***

**Agree**

Disagree

Don't know

Prefer not to say

**12. Blanket Policies and Core Hours**

The government's aim is to prevent outdated restrictions remaining on businesses indefinitely.

Blanket policies, for example establishing core opening hours, are not reflected in the Licensing Act 2003. These can be placed on premises licences indefinitely, often based on historic concerns. Under the Licensing Act, licensing authorities are required to consult and publish a Statement of Licensing Policy every five years. The statutory guidance on statements of licensing policy (chapter 14, paragraph 51) also ensures that "licensing authorities must always consider each application and must not impose predetermined licensed opening hours, without giving individual consideration to the merits of each application".

Through this call for evidence the Government wants to explore the case for introducing requirements to ensure any blanket policies that restrict certain licensed activities within a specific or local authority area, are proportionate. This could include, for example, the need to undertake an assessment to ensure any blanket approach is proportionate, requirements to set timeframes for blanket policies and to monitor impact, or a requirement to review impact before terminating or extending the policy. This may include blanket policies that apply to off-trade premises as well.

#### 34. Do you agree or disagree that blanket policies should be subject to regular review or sunset clauses? \*

Agree

**Disagree**

Don't know

Prefer not to say

#### If there were regular reviews, what timeframe would be appropriate? (text box)

This question is misleading. There are no blanket policies preventing longer trading hours at licensed premises. Through 'core hours policies', some Statements of Licensing Policy offer guidance to applicants as to what types of applications licensing authorities generally grant automatically and which types of application require judgements on-merit. Such judgements are based upon the criteria set out in the licensing policy statement as to how decisions on later hours will be made. This is always on a case-by-case basis, to best promote the licensing objectives.

The guidelines in Statements of Licensing Policy are based on local evidence and consultation. For example, core hours and conditions have been used to address off-sales driving street drinking impacts and 'pre-drinking' on the Licensing Objectives in Brighton and Hove.<sup>28</sup> Representations from the police, local residents and the

director of public health at licensing panel hearings testified to these problems. Licensing measures used to address these issues allow the council to consider appropriate opening hours, levels of staffing and training to ensure that licensing objectives are not negatively impacted. It should be noted that the generous TENs allocations work alongside Core Hours policies, therefore already allowing premises a great deal of flexibility to set their trading hours later throughout the year.

Statements of Licensing Policy are already reviewed and subject to consultation every five years.

**35. Are there any existing data or evidence sources you would recommend authorities use to assess the impact of a blanket policy before it is extended or terminated? (text box)**

Statements of Licensing are already reviewed, on the basis of local evidence and consultation, every five years. These will include assessments of cumulative impact, where applicable, which often overlap with the question of trading hours in areas where licensed premises are clustered.

**36. Does the local authority area you operate in have any special licensing policies — for example, core hours, late-night levy schemes or other locally applied conditions?**

**This question asks whether you live or work in an area with special licencing policies. Please tell us if any special policies apply in your local area. \***

**Yes**

No

Don't know

Prefer not to say

**If you answered 'yes', how has it affected your business or community? (text box)**

Many local authority areas operate special licensing policies, such as core hours and late-night levies. These are vital, evidence-based tools that allow local licensing authorities to protect the public and reduce alcohol-related harm.

Statements of Licensing Policy enable councils to tailor licensing guidance to local needs. They support decision-makers to consider how a particular application or variation might affect the licensing objectives, and to apply local conditions

accordingly. Such measures ensure that licensing decisions remain accountable, proportionate, and grounded in community experience.

For example, late-night levy schemes recognise the well-established link between late-night alcohol sales and increased demand on police, emergency healthcare, and street services. Newcastle City Council operates one of the most established schemes in England. It charges an annual fee to licensed premises selling alcohol between midnight and 6 a.m., with revenue shared between the local authority and police. This has funded measures such as static police guarding at hotspots, an emergency healthcare drop-in centre, and street pastor schemes – helping keep city centres safer at night.

Evidence also shows that Late Night Levies can improve collaboration and strengthen relationships between authorities, police, and the licensed trade. An evaluation of a London local authority's levy found that, contrary to industry concerns, the levy did not undermine public–private partnerships or damage the diversity of the night-time economy.<sup>29</sup> Instead, levy-funded patrols helped develop constructive relationships with venues and improved management of the night-time environment.

Similarly, 'core hours' policies allow councils to reflect the differing impacts of trading hours across the evening and late-night economy. Evidence shows that restrictions to trading hours reduce alcohol-related harm. International examples reinforce this:

- In Stuttgart, a 10 p.m.–5 a.m. ban on off-licence alcohol sales reduced alcohol-related hospitalisations among young people by 7%, and also reduced admissions for violent assaults.<sup>30</sup>
- In Switzerland, partial restrictions on off-sales after 8–9 p.m. on weekends reduced hospital admissions for alcohol intoxication across a broad age range (16–69 years).<sup>31</sup>
- A study of two entertainment precincts in New South Wales found that introducing earlier closing times and restricting late-night alcohol service led to a 29% reduction in reported domestic violence assaults in Newcastle, preventing an estimated 204 assaults over the study period.<sup>32</sup>

Proposals that weaken these local powers would undermine the ability of communities to respond effectively to alcohol-related harm. Local flexibility and evidence-led policy are essential features of a robust and accountable licensing system.

### **13. Evidence and Data Protocol**

Our aim is to ensure that evidence and data needed for licence reviews and objections are objective and transparent.

We are considering developing a national protocol to standardise evidential requirements, promote mediation and clarify objection procedures. One approach, for example, would be to give licensing officers more influence in the licensing process in a similar way to planning officers. Any changes would be intended to reduce costly disputes, improve transparency and ensure decisions are proportionate and legally sound.

**37. The Proximity Test. Paragraph 8.13 of the section 182 guidance states that any individual or business entitled to make representations may do so “regardless of their geographic proximity to the premises”. Should there be a requirement for individuals and businesses who make representations in favour or against a licence application to be in geographic proximity to the premises? \***

Yes

**No**

Don't know

Prefer not to say

**38. Objections. Paragraphs 9.4 to 9.10 of the s.182 guidance seek to prevent irrelevant, vexatious or frivolous representations. Does this mechanism successfully eliminate such representations? \***

Yes

**No**

Don't know

Prefer not to say

**If you answered 'no' please comment on what more could be done to minimise such representations? (text box)**

The law clearly stipulates that representations should not be irrelevant, vexatious or frivolous. If applied properly, this should prevent inappropriate representations from going forward. Currently, representations where relevance is unclear are given the 'benefit of the doubt' and taken forward to committee. This is an essential protection against unaccountable gatekeeping by unelected administrative officials and the Taskforce recommendation that it be removed should not be taken forward.

If there is robust evidence that irrelevant representations are routinely being made, this should be subject to analysis prior to any change in the law in order to establish prevalence and impact. The anecdotal claims set out in the Taskforce review do not meet the basic evidence threshold that should be required for a change of this nature. Similarly, anecdotal statements provided in response to this question should not be treated as robust evidence of systemic failures. If evidential thresholds matter in this regard, they should also apply to this call for evidence.

The Taskforce proposals will undermine the scrutiny and accountability of local licensing authorities, who are already required to refer to the licensing objectives when making decisions.

The suggestion that representations could only be made by individuals and businesses in geographic proximity to the premises does not take account of the huge rise in off-sales alcohol retail, including via supermarkets and rapid delivery. Premises such as warehouses and supermarkets deliver over large catchment areas, with harms distributed much further afield.

Fulfilling the public protection objectives of licensing requires proper scrutiny and democratic accountability. The Taskforce proposals would create decisive new powers for unelected licensing officers to direct and overrule committee decisions, and to determine which representations they consider. This undermines local democracy and accountability.

Question 39 below is misleading. We have therefore responded 'don't know' to ensure that our response is not counted as approving reforms not made clear in the question itself.

Representations are already required to address the licensing objectives. Any representation that does not address itself to the licensing objectives is ignored as it is not deemed relevant. If the proposal is to significantly increase the nature and scale of evidence required for representations to be accepted, and for this decision to be devolved to unelected licensing officers, as proposed in the Taskforce report, then this should be made clear. As it stands, reforms concerning evidence thresholds should not be taken forward on the basis of responses to Q39 because the question does not indicate the actual nature and scale of the changes being proposed.

Question 40 is also misleading. It does not explain to respondents that there is currently a requirement for conditions to be 'appropriate and proportionate'. Nor does it explain that the word 'necessary' was removed from the s182 guidance in 2011 because it established an unworkable threshold, and prevented licensing authorities from applying reasonable conditions if they could not demonstrate they were absolutely necessary to promoting the objectives.

**39. Improve Evidential Standards. Should there be a requirement that representations opposing a licence present the case and evidence for harms to one or more of the licensing objectives? In other words, only representations stating that there is an objection concerning the licensing objectives would count. \***

Yes

No

**Don't know**

Prefer not to say

**40. Necessary and Proportionate Test. Should there be a test applied to examine whether licensing conditions are necessary and proportionate? \***

Yes

**No**

Don't know

Prefer not to say

**41. Do you agree or disagree that the decisions of a licensing officer should carry greater weight with the licensing committee?**

**This question asks whether a licensing officer should have the status of an 'independent arbiter' whose decisions carry greater weight than those of other parties. \***

Agree

**Disagree**

Don't know

Prefer not to say

**42. How should informal mediation and resolution be encouraged at the start of the process of making representations? (text box)**

The Taskforce proposals would create decisive new powers for unelected licensing officers to act as independent arbiters in the case of disputes. This undermines local democracy and accountability and will create further conflicts. Local licensing forums could provide spaces for mediation between applicants and committees.

## 14. Festivals and Events

The government aims to support investment in festivals and community events, such as outdoor events which may include the sale of alcohol.

Licensing affects the festivals and events sectors and the government is interested to understand where there may be scope to support these sectors through a more effective, and lighter touch approach to licensing.

A key proposal raised by the Licensing Taskforce was whether to enable longer-term or perpetual licences for recurring festivals and events to support investment and planning. This call for evidence is interested in understanding views on how far any changes could foster stability and growth in the festivals and events sectors.

### 43. Do you support enabling longer-term or perpetual licences for recurring festivals and events? \*

Yes

No

Don't know

Prefer not to say

### 44. Would evidence of a safe and successful event held in previous years be sufficient evidence in most cases for granting licence extensions for repeat events? \*

Yes

No

Don't know

Prefer not to say

### 45. What else could be done to help promote long term investment in, and planning of, events? (text box)

The licensing regime is not the appropriate mechanism for the promotion of investment in events. The purpose of licensing is public protection.

## 15. Agent of Change Principle

**The Government is considering how the Agent of Change (AoC) principle is currently applied in licensing to better protect existing licensed premises (including theatres, music and sporting venues) and residents.**

### **What is the Agent of Change Principle?**

The AoC principle places the responsibility for mitigating impacts from existing noise-generating activities on any new development. For example, if a developer plans to build new homes near an existing music venue, the developer is responsible for mitigating any potential problems, e.g. installing soundproofing.

The principle is already embedded into the planning system. The National Planning Policy Framework is clear that where the operation of an existing business could have a significant adverse effect on new development in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.

The Licensing Act 2003 is intended to give local licensing authorities the ability to consider a variety of local factors when taking licensing decisions. While the actions of authorities are expected to promote the four statutory licensing objectives, the regime seeks to avoid a one-size-fits-all approach. It recognises that different communities face different challenges. Local licensing authorities are able to incorporate the Agent of Change principle into their statements of licensing policy if they consider it necessary or useful to do so. However we want to understand how this is currently being considered as part of licensing decisions, how effective it is, and whether it would be beneficial to strengthen this approach.

### **46. Should the licensing regime give greater weight to the Agent of Change principle? \***

**Yes**

No

Don't know

Prefer not to say

### **47. Can you provide examples of where existing businesses have faced complaints or licensing restrictions due to new residential development nearby?**

### **48. What practical steps or tools would help licensing authorities apply the Agent of Change principle effectively (e.g. guidance, training, data sharing)?**

## **17. Hospitality, Leisure & Cultural Zones**

Designating zones to preserve economic and cultural activity is something that has been used successfully in the UK by local authorities, and also overseas, for example in New South Wales. The Government would like to explore how zoning might be used by local authorities in hospitality, leisure and cultural areas to help develop, preserve and manage vibrant night-time economies, while continuing to protect local communities.

The Government would therefore like to use this Call for Evidence to help inform early policy development in this area.

### **49. Are there recognized examples of effective practice in the UK that could contribute to the development of policy and guidance for local authorities? (text box)**

We do not support the proposal to introduce hospitality, leisure and cultural zones. See our answer to question 51 [question 48 in new online consultation document] for more detail.

### **50. Should there be a requirement for local authorities to consult with local businesses, enforcement agencies and local residents on the creation of zones? \***

**Yes**

No

Don't know

Prefer not to say

### **51. What existing or new licensing or planning mechanisms could be used by local authorities to develop and manage zones? (text box)**

We do not support the proposal to introduce designated hospitality, leisure, or cultural zones. Although the Call for Evidence does not provide specific details, press coverage and related commentary suggest that such zones could be used to “fast-track” the licensing process. This approach risks undermining the ability of local authorities, residents, and Responsible Authorities to scrutinise new licences or variations and to protect their communities.

Many Licensing Authorities have deliberately avoided creating intensely concentrated zones of licensed premises over the past two decades. Market forces naturally drive the spatial clustering of alcohol outlets, off-sales, and late-night refreshment premises, which in turn increases risks to public safety and community wellbeing. The current regulatory framework provides a robust tool to manage this: Cumulative Impact Policies (CIPs). The Section 182 guidance clearly sets out how CIPs may be established, including guidance on when, where, and why they are appropriate. These policies are evidence-based, drawing on correlations between concentrations of licensed premises and local data on crime, disorder, ambulance call-outs, noise complaints, criminal damage, and demands on street cleaning services.

Environmental criminology concepts further illustrate the risks of over-concentrated alcohol zones. Night-time economy areas can function as both crime generators (due to overcrowding and intoxication) and crime attractors (drawing opportunistic offences such as theft or sexual predation). Concentrating alcohol outlets intensifies these harms, creating additional risks in public spaces and venues that might otherwise not occur if outlets were more evenly distributed.<sup>33</sup> While some argue that concentrated zones are easier to police, this does little to mitigate the harms and falls short of the Licensing Objectives.

Moreover, the Licensing Act applies to off-sales, including rapid alcohol delivery, which often serves large catchment areas. Establishing zones that facilitate fast-tracked licensing would exacerbate difficulties for local authorities in managing 24/7 availability of alcohol and protecting residents from alcohol-related harm.

In summary, hospitality and leisure zones would reduce the agency of communities and responsible authorities, weaken existing public protection measures, and encourage the intensification of alcohol-related harms. The current system, using Cumulative Impact Policies and careful local scrutiny, provides a far more appropriate, evidence-led framework to manage vibrant night-time economies while safeguarding public health and safety.

## **52. What indicators might be appropriate for local authorities to assess the impact of zones? (text box)**

We do not support the proposal to introduce zones whose purpose is to ‘fast track’ licensing applications. The licensing system clearly outlines how local authorities should assess the impact of licensing, with reference to the licensing objectives. Any changes to these objectives, which authorities use to assess the impact of licences, should be made via full legislative reform, with proper democratic scrutiny.

**53. Are there documented cases where local authorities have effectively used planning or licensing mechanisms to influence the business mix within specific zones? (text box)**

**18. Impacts – crime, public health, local authorities, equality**

**54. Which, if any, of the Licensing Taskforce recommendations do you expect to place the most significant burden on licensing authorities' capacity and ability to fulfil their usual function? \***

**National Licensing Policy Framework**

**Licensing Condition Amnesty**

Remove Newspaper Advertising Requirement

**Outdoor Trading and Pavement Licences**

**Increase TENs Entitlement**

**Sunset Clause on Blanket Hours**

**Arbitration, Evidence and Data Protocol**

**Festivals and Events Licensing**

Agent of Change Principle

None

Don't know

Prefer not to say

**What measures would you suggest putting in place to mitigate any impact? (text box)**

The proposals set out in the Licensing Taskforce report will undermine the licensing regime, fundamentally altering its purpose of public protection. This change in the purpose of the licensing regime is being proposed without adequate input from licensing authorities themselves, and without the scrutiny of full legislative reform.

The proposal to include a statutory objective of economic growth would introduce a conflict between the licensing objectives that will obstruct licensing authorities from fulfilling their function to protect the public. This inherent contradiction will also result in higher levels of appeals and administrative burden for local authorities.

**55. In your view what impact will the proposals for reform included in this Call for Evidence have on public safety or crime? \***

Very positive

Positive

None

Negative

**Very negative**

Don't know

Prefer not to say

**56. Which, if any, of the reforms described in this Call for Evidence, in your view, pose public safety or crime concerns? \***

**National Licensing Policy Framework**

**Licensing Condition Amnesty**

Remove Newspaper Advertising Requirement

**Outdoor Trading and Pavement Licences**

**Increase TENs Entitlement**

**Sunset Clause on Blanket Hours**

**Arbitration, Evidence and Data Protocol**

**Festivals and Events Licensing**

Agent of Change Principle

None

Don't know

Prefer not to say

**Why do you think this? (text box)**

In the Government's response to the Taskforce report, it said that "We will ensure...that licensing reforms support efforts to tackle crime and antisocial behaviour in our town centres, without compromising the protection of vulnerable people." Yet these proposals will do exactly the opposite. Higher levels of alcohol availability are consistently linked to increased crime and poorer public safety in

neighbourhoods and high streets. The deregulation of licensing proposed by the Taskforce will increase alcohol availability and reduce local authorities' ability to implement protections on its sale and consumption.

Emerging evidence indicates that frontline services, including the police, struggle to manage the effects of greater alcohol availability, particularly late at night. Later opening hours shift violence into the early hours and place additional demands on officers, who are drawn away from routine community policing to manage intoxicated or vulnerable individuals. Proposals designed to encourage economic growth through extended licensing are therefore at odds with any genuine intention to create safer streets.

The annual cost of alcohol-related crime and disorder in England alone is estimated at £14.58 billion.<sup>34</sup> These reforms risk increasing these costs, without credible evidence of the claimed economic benefits for the on-trade or hospitality sector. With such a poor cost-benefit profile, widespread public sector opposition, and multiple potential unintended consequences, we strongly oppose these proposals.

Alcohol-related harms are disproportionately felt in the most deprived areas of England and Wales. People in lower socioeconomic groups are more likely to experience frequent alcohol-related antisocial behaviour (ASB), with around half of those affected reporting weekly or more frequent incidents.<sup>35</sup> Increased availability – through additional outlets or longer trading hours – is also associated with higher rates of violence, including domestic and sexual violence against women.<sup>36</sup> Licensing reforms that encourage greater purchase and consumption of alcohol risk both increasing and intensifying these harms. Home Office analysis indicates that alcohol is a factor in nearly half of intimate partner homicides,<sup>37</sup> and in 2022/23, victim-survivors of partner abuse reported that the perpetrator was under the influence of alcohol in 13% of incidents.<sup>38</sup>

Alcohol is also frequently used as a perceived coping mechanism by both perpetrators and survivors of abuse. Research shows high levels of alcohol use among individuals experiencing domestic abuse, as well as among those receiving treatment for alcohol problems.<sup>39</sup> Licensing changes that expand availability would therefore exacerbate cycles of abuse and harm.

The Taskforce proposals undermine the public protection objective of licensing by facilitating greater availability and limiting local authorities' ability to impose sensible conditions. They would weaken attempts by national and local government to make streets safer and do nothing to mitigate harms from rapid alcohol delivery or cheap, high-strength alcohol in supermarkets.

**57. In your view what impact will the proposals for reform included in this Call for Evidence have on public health? \***

Very Positive

Positive

None

Negative

**Very Negative**

Don't Know

Prefer not to say

**58. Which, if any, of the reforms described in this Call for Evidence, in your view, pose public health concerns. \***

**National Licensing Policy Framework**

**Licensing Condition Amnesty**

Remove Newspaper Advertising Requirement

**Outdoor Trading and Pavement Licenses**

**Increase TENs Entitlement**

**Sunset Clause on Blanket Hours**

**Arbitration, Evidence and Data Protocol**

**Festivals and Event Licensing**

Agent of Change Principle

None

Don't know

Prefer not to say

**Why do you think this? (text box)**

The proposed licensing reforms will further increase alcohol availability and weaken local protections around its sale, posing serious risks to public health.

Alcohol consumption has widespread and well-documented negative impacts in the UK. Around three-quarters of the population drink, and millions experience alcohol-related harm. Recent research indicates that even consumption below the low-risk guideline of 14 units per week is associated with higher rates of cancer and cardiovascular disease.<sup>40</sup> Alcohol remains a leading risk factor for death among

those aged 15–49 in England.<sup>41</sup> Harm is not limited to people with alcohol dependence; it also includes poor sleep, dental health issues, mental ill-health, chronic conditions, injuries, and absenteeism from work.<sup>42</sup> Evidence suggests these harms will increase without intervention.<sup>43</sup>

The economic and societal costs of alcohol are substantial. In England, the annual cost of alcohol-related harm is estimated at £27.44 billion, and over £1 billion in Wales, including health, crime, and lost productivity.<sup>44</sup> These figures likely underestimate the full impact, as acute harms place significant pressure on emergency services.<sup>45</sup> The state spends £1.9 billion annually managing preventable alcohol-related harm in ambulances and A&E.<sup>46</sup> Alcohol is implicated in up to 40% of emergency department attendances, rising to 70% during peak hours,<sup>47</sup> and 10–16% of ambulance call-outs are alcohol-related<sup>48 49</sup>. During the first COVID lockdown, alcohol-related ambulance attendances initially fell when pubs and nightclubs closed but returned to pre-lockdown levels due to increased off-trade consumption.<sup>50</sup> Ambulance staff report that alcohol-related call-outs are common, resource-intensive, and often involve harassment or violence from intoxicated patients or bystanders.<sup>51</sup>

The 2003 Licensing Act has facilitated growth in the number of licensed premises, including 24-hour venues.<sup>52</sup> Proposed deregulation will increase alcohol availability and hinder national and local efforts to protect public health. Greater access is linked to higher consumption, increased hospitalisations, alcohol-related disorder, violence, and deaths.<sup>53</sup> The impacts of increased availability include:

- Easier access to shop-bought or delivered alcohol, increasing frequency of consumption and related health harms;
- Extended late-night drinking, raising risks of accidents, violence, and acute illness;
- Greater exposure to alcohol marketing and promotions, triggering impulse purchases, undermining recovery efforts, and exposing children and adults to harmful messaging.<sup>54</sup>

England and Wales already have higher alcohol availability than other UK nations, including 24-hour licences, which grew by 31% from 2018 to 2022, predominantly through convenience stores. Pubs, bars, and nightclubs account for less than 10% of 24-hour premises.<sup>55</sup> Rapid delivery services, including warehouse-based operations without shopfronts, now operate around the clock, making it easier for individuals to consume more alcohol and increasing access for children and young people.

While the licensing system requires reform, the current permissive regime already restricts local authorities' ability to manage alcohol-related harm. Decision-makers are largely limited to case-by-case assessments of individual premises, without accounting for broader population-level or cumulative impacts, including long-term public health consequences.

Despite these limitations, local authorities actively use available data on harms – including hospitalisations and crime statistics – to shape Statements of Licensing Policy and implement local conditions or restrictions that mitigate risk. Weakening these local powers will undermine public protection, exacerbate health inequalities, and place additional pressure on emergency services.

Much of the proposed reform does not introduce new powers but centralises powers already held by local authorities. Under the current system, local authorities can grant late-night opening hours if they consider it appropriate. At the moment the alcohol licensing system is one of very few ways that local government can do anything to try and address alcohol-related problems, by influencing what kinds of places can sell alcohol, at what times and under what conditions. The reforms would therefore override local decision-making, imposing a more permissive approach that would disproportionately affect areas currently using licensing proactively, which are often those with the highest alcohol-related harms and greatest deprivation, raising significant equality concerns.

The whole Taskforce and Government process is hugely worrying from a democratic and commercial determinants of health lens. As a recent journal commentary has stated<sup>56</sup>:

“Conducted at speed, with minimal public scrutiny, systematically excluding health considerations and dominated by commercial interests, it constitutes a clear case of ‘regulatory capture’... The taskforce report and government response seek to shift power significantly towards private, commercial interests” and away from public accountability and local democracy.”

Not only would these proposals be a blow to democracy and accountability, but also the Government’s proposal to establish a Licensing Working Group. As the same journal article states:

“Finally, it [the Government] proposes establishing a Licensing Working Group within the Hospitality Sector Council—an industry advisory body, whose membership overlaps with the licensing taskforce—to ‘advance broader proposals’ (p. 11). Thus creating further mechanisms for commercial actors to shape licensing reforms going forward.”

### **59. In reforming the licensing system to promote economic benefits, what measures can be taken to promote public health? (text box)**

If the Government wants to empower local authorities to protect public health, reduce A&E admissions from acute alcohol harm, tackle chronic illness, and respond to record levels of alcohol-related deaths, these proposals should not be implemented.

While the Government states that it hopes to ‘breathe new life into the high street,’ further deregulation of licensing is likely to have the opposite effect. It will disproportionately benefit large pub-owning companies, supermarkets, and

multinational alcohol producers, rather than local pubs and community venues that underpin vibrant town centres.<sup>57 58</sup>

Although this consultation focuses on the on-trade, the Licensing Act also governs the off-trade, including off-licences, supermarkets, and alcohol delivery services. The proposed deregulation will further increase the 24/7 availability of alcohol, including sales from warehouses and storage facilities that contribute little to local high streets or communities.<sup>59</sup>

Separating the licensing regimes for on-trade and off-trade premises would allow the Government to better regulate off-trade alcohol sales – addressing public health harms, including home drinking and rapid delivery – while supporting local pubs and community-focused venues. This distinction would create a licensing system capable of reducing harm while supporting on-trade businesses.

#### 60. Does this call for evidence raise any equalities concerns such as disproportionate impacts on particular demographic groups? \*

Yes

No

Don't know

Prefer not to say

#### Why do you think this? (text box)

The proposed fundamental changes to the purpose of the licensing system risk undermining the work of local authorities to protect the most vulnerable groups in their communities.

These proposals would have a disproportionate impact on economically deprived populations, who are already at higher risk of alcohol-related harm. People in deprived areas are many times more likely to be admitted to hospital or die from alcohol-related causes, despite typically consuming less alcohol than higher-income groups.<sup>60</sup> Off-sales alcohol availability – and the associated harms – is also concentrated in these communities. Weakening local powers to refuse licences or impose conditions will exacerbate these inequalities.

Evidence indicates that deprivation amplifies the negative effects of alcohol availability on violent crime.<sup>61</sup> Greater alcohol availability is also associated with higher levels of domestic and sexual violence, disproportionately affecting women and girls.<sup>62</sup>

Increasing alcohol availability is likely to make evening, night-time, and late-night economies more alcohol-focused, reducing diversity and accessibility in hospitality and entertainment. This would undermine efforts to promote community cohesion

and support culturally and socially focused venues and events, which provide safe, inclusive alternatives to alcohol-dominated settings.

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