

UK government consultation on reforming the licensing system - WCRF response

November 2025

World Cancer Research Fund examines how diet, weight and physical activity impact the risk of developing and surviving cancer. As part of an international network of charities, we have been funding life-saving research, influencing global public health policy and educating the public since 1982. While society continues searching for a cure, our prevention and survival work is helping people live longer, happier and healthier lives - free from the devastating effects of cancer.

Our response will focus on our expertise in cancer prevention as it relates to alcohol. As members of the Alcohol Health Alliance, we also endorse their response.

1. About you - are you responding as:

- An individual
- A public sector organisation
- A private sector organisation
- A voluntary sector organisation

2. What is the name of the organisation/ business that you are responding on behalf of?

- World Cancer Research Fund

3. Which of the following best describes the organisation/ business you are responding on behalf of?

- Public Health Organisation

4. How many employees do you or the organisation that you are responding on behalf of have?

- 53

5. Do you or the organisation/ business that you work for, hold an alcohol licence issued for a premises located in either England or Wales under the Licensing Act 2003? *

- Yes
- No
- Don't know
- Prefer not to say

6. Have you engaged with the alcohol licensing process previously?

- Yes, as an applicant

- Yes, as a consultee/objector
- Yes, as a responsible authority
- **No**
- Don't know
- Prefer not to say

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

The proposal to introduce a National Licensing Policy Framework, that can centrally direct and determine local decisions, undermines local authorities and contradicts the Government's commitment to devolution and localism. The proposals do not outline how the National Licensing Policy Framework will be constituted, or who it will represent. There is also no information on how it will be held accountable.

The overarching objective of the licensing system should be to reduce harm and enable local decisionmakers to address the widespread impact of alcohol in their communities. There is already comprehensive, regularly reviewed statutory guidance on licensing. Licensing is based on detailed local evidence, the extensive and localised knowledge of local Responsible Authorities and Licensing Authorities, and public consultation exercises. The strength of the current licensing approach is its flexibility, and this was lauded as a major advantage of the Licensing Act 2003 over previous legislation.

The proposals are at odds with other Government priorities, including building healthier communities and addressing preventable ill-health, creating safer streets and neighbourhoods, reducing violence against women and girls and empowering communities to make the changes they want to see in their local areas.

If the Government genuinely wants to revitalise our neighbourhoods and high streets and is serious about prevention, it must enable local authorities to make the decisions that are right for their communities, based on local evidence and need. Harms caused by alcohol are widespread in England and Wales, including mental health problems, chronic illness, absence from work, injuries, violence and record levels of alcohol-related deaths.¹ One of the most significant and often overlooked

¹ Department for Health and Social Care (2025) [Alcohol-related mortality](https://fingertips.phe.org.uk/profile/local-alcohol-profiles/data#page/4/qid/1938132984/pat/159/par/K02000001/ati/15/are/E92000001/iid/93763/age/1/sex/4/cat/-1/ctp/-1/yr/1/cid/4/tbm/1/page-options/eng-vo-1) [Accessed 18.09.2025]
<https://fingertips.phe.org.uk/profile/local-alcohol-profiles/data#page/4/qid/1938132984/pat/159/par/K02000001/ati/15/are/E92000001/iid/93763/age/1/sex/4/cat/-1/ctp/-1/yr/1/cid/4/tbm/1/page-options/eng-vo-1>

long-term health impacts of alcohol is cancer. As a Group 1 carcinogen, it is linked to at least seven cancer types² and in 2015 caused almost 17,000 cases in the UK³.

The proposal to introduce a National Licensing Policy Framework will create yet more blockages for democratically elected decisionmakers and local communities to shape the spaces in which they live and work and reduce this harm. It is concerning that this proposal was developed with minimal input from policing, and apparently no input from ambulance services, local licensing authorities and health practitioners who are tasked with picking up the pieces when alcohol causes harms in their area.

The Licensing Act enabled greater democratic accountability for alcohol licensing, by moving the responsibility into local authority hands.⁴ Introducing a new, centralised framework would be a huge step backwards at a time when Government has said that it is committed to moving away from ‘micromanaging from the centre.’⁵

The proposed objective of the National Licensing Policy Framework to promote economic growth runs counter to, and would create direct conflicts with, the primary public protection purposes set out in the Licensing Act and the section 182 guidance. The proposals do not outline how this conflict would be managed.

At the same time, the proposals are bad for economic growth in the hospitality sector (despite this being a key objective of these licensing plans) and the revitalisation of our high streets.

Promoting economic growth should not be a statutory licensing objective, and would likely contradict the existing public safety objectives. The core purpose of licensing is to create guardrails for public protection – not to promote business or investment.

The licensing system in England and Wales is already highly permissive, and most applications are approved. Introducing economic growth as an objective would fundamentally change the historical function of licensing and would do so without the scrutiny of full legislative reform.

Introducing economic growth as an objective will also create an inescapable misalignment between the objectives, forcing licensing authorities to litigate conflicts between additional outlets for growth and risks to other objectives. This will create a significant administrative burden for licensing committees and greater likelihood of appeal.

Although this call for evidence states a focus on the on-trade, introducing a statutory objective to promote economic growth would also apply to the off-trade, unless a mechanism were put in place to treat these separately. This means it is simply not

² World Cancer Research Fund. Alcoholic Drinks. Available at: <https://www.wcrf.org/wp-content/uploads/2024/10/Alcoholic-Drinks.pdf>

³ Rumgay, H., Shield, K., Charvat, H., Ferrari, P., Sormpaisarn, B., Obot, I., Islami, F., Lemmens, V. E., Rehm, J., & Soerjomataram, I. (2021). Global burden of cancer in 2020 attributable to alcohol consumption: A population-based study. *The Lancet Oncology*, 22(8), 1071–1080. [https://doi.org/10.1016/s1470-2045\(21\)00279-5](https://doi.org/10.1016/s1470-2045(21)00279-5)

⁴ Local Government Association (2021). *Licensing Act 2003 - Councillor's handbook (England and Wales)*. <https://www.local.gov.uk/publications/licensing-act-2003-councillors-handbook-england-and-wales-0>

⁵ Ministry of Housing, Communities & Local Government (2024) English Devolution White Paper. <https://www.gov.uk/government/publications/english-devolution-white-paper-power-and-partnership-foundations-for-growth/english-devolution-white-paper>

possible under the current legislation to selectively apply these proposed changes to one form of licensed premises and not another, without revisiting and revising the Licensing Act entirely. Whilst we would welcome a wider rethink of the legislation, which was not designed to appropriately manage more recent changes in consumption (such as rapid online deliveries) and the harms they drive, a full revision of the act appears to be out of scope for these proposals and would require far more consideration and consultation.

Introducing a licensing objective around economic growth will:

- Make it more difficult for local licensing authorities to curtail the sale of alcohol in shops and online, and for local communities and stakeholders to raise objections.
- Make it much harder for local authorities to place conditions on licences that regulate how alcohol is sold and prevent irresponsible promotions.
- Undermine the ability of local authorities to control late-night sales in both shops and bars.

These are steps in the opposite direction from what is needed given the implications for public protection and health.

In addition, despite an economic growth licensing objective being proposed with the intention of supporting the on-trade sector, there is no indication that these proposals will directly benefit the on-trade, and may in fact further undermine its growth by equally loosening licensing restrictions for the off-trade, an already-significant commercial contributor to some of the issues the on-trade continues to experience.

For example, the proposed licensing reforms include nothing to incentivise customers to go out to restaurants, pubs, music venues, nightclubs, theatres and other community venues, instead of purchasing alcohol from off-trade premises such as supermarkets and off licences to consume at home. The proposals will also do nothing to level the playing field between independent community venues and the large corporations who stand to gain the most from the proposed reforms.⁶ Finally, the proposals also do not diversify and broaden the appeal of the evening and night-time economy outside of its focus on alcohol sales. This transition is badly needed, and many Licensing Authorities are attempting to engineer positive change through their licensing policies. If the Framework focuses on the needs of key players in the existing economy, it risks undermining these community-led goals that also support the licensing objectives.

Allowing for extended opening hours is also unhelpful for growth – emerging evidence from a large study of later opening hours in two cities found that premises either (1) open later to compete with other bars that do so, even when doing so isn't worth it economically or loses them money or (2) keep their current hours but lose customers to later opening premises. Smaller, independent businesses find it hardest to absorb these losses. Emerging evidence from interviews with 54

⁶ Cary, B., Crossman, P., Deakin, R., Sidgwick, K., Thurnell-Read, T. and Wells, V. (2025) A pint-sized conversation: publicans, brewers, and academics on the UK beer, pub and brewing industry, *Journal of Marketing Management*, 41:7-8, 781-800
<https://www.tandfonline.com/doi/full/10.1080/0267257X.2025.2520653>

bars/pubs who applied for an extension in their opening hours until 1am in Glasgow (previously midnight) found that the extra hour was not worth the costs involved in terms of paying for staff and getting them home. Whilst some premises found it profitable, several reported that it led to higher levels of intoxication or violence or was a 'waste of time'.⁷

It is widely recognised that consumer demand for alcohol in on-trade premises, especially later at night, has been falling since before the pandemic. These proposals may increase the numbers of premises competing for decreasing consumer numbers, potentially making existing premises even less economically viable. Lower demand for alcohol in hospitality businesses is in large part due to the increased availability of cheap alcohol in shops and supermarkets. Alcohol in UK shops is three times more affordable than it was in 1988.⁸ In England, it costs just £5.25 to buy 18.8 units of alcohol, almost five units more than the maximum the UK Chief Medical Officers recommend consuming in a week.⁹ Alcohol sold in the off-trade, such as shops and supermarkets, has become much more affordable, more quickly, than alcohol in pubs over the last 30 years.¹⁰ These proposals will make cheap alcohol even more available to consumers as they will make it even easier for shops or warehouses to get alcohol licences, increasing outlet density and competition between off-trade venues, which can drive down prices even further. This would worsen the trend towards drinking alcohol at home, including mixing this with on-trade drinking (for example cumulative heavy consumption over the course of the day at home and in venues).¹¹

Increasing the availability of alcohol will not deliver growth in the economy. Instead it will deliver growth in the number of victims of crime, growth in demand on A&E, growth in incidence of liver disease, cancer, heart conditions, anxiety and depression - and an overall reduction in productivity as more people miss workdays or experience long-term sickness. The economic 'benefits' if any, are therefore likely to be felt narrowly by selected large alcohol retailers at the expense of other parts of the economy (along with increased public sector expenditure).

We agree that the Licensing Act (2003) is no longer fit for purpose and must be updated, particularly to tackle harm caused by the rise in off-trade availability and rapid alcohol delivery.

It is important to highlight that not only will these proposals weaken licensing regulation in the UK, but they also run counter to guidance provided under the World Health Organisation's (WHO) SAFER initiative, developed in collaboration with

⁷ Maclean J. et al. (2025). Bar manager perspectives on a Glasgow pilot allowing them to open until 1am instead of midnight: a qualitative interview study. Forthcoming paper from the ELEPHANT study, funded by the NIHR public health research programme.

⁸ Angus, C. (2025a). [@victimofmaths.bsky.social](#) April 1 2025

⁹ Iceland (2025). [Frosty Jack's Cider 2.5L](#) [Accessed 15 September 2025]

¹⁰ Angus, C. (2025b) [@victimofmaths.bsky.social](#) April 2025

¹¹ Holmes, J., Sasso, A., Hernández Alava, M., Neves, R.B., Stevely, A.K., Warde, A. and Meier, P.S. (2024). How is alcohol consumption and heavy episodic drinking spread across different types of drinking occasion in Great Britain: An event-level latent class analysis. *International Journal of Drug Policy*, 127, 104414.

international partners¹². The initiative identifies the 5 most cost-effective interventions for reducing alcohol harm.

A core policy within SAFER is to strengthen restrictions on the physical availability of alcohol, which crucially includes licensing¹³. Appropriate licensing reduces a wide range of alcohol harms and prevents easy access by vulnerable and high-risk groups. The commercial and public availability of alcohol also shapes its social availability, contributing to cultural norms that normalise drinking, including high risk consumption¹⁴. Appropriate licensing therefore plays an important role in reducing overall alcohol consumption and mitigating its long-term harms, including cancer.

The SAFER initiative asserts that licensing regulation should empower local authorities to reduce and prevent alcohol-related incidence of violence, crime, public disturbance, and health harms¹⁵. It also advises against extending alcohol sale hours and recommends curtailing them further where certain communities experience increased alcohol-related harm.

Countries are therefore urged to enact and enforce regulations that restrict alcohol's physical availability. The UK Government's proposals, however, run counter to these recommendations, and the economic principle underpinning them would incentivise local authorities to increase alcohol availability.

The process by which these proposals were developed also contradicts international recommendations. The SAFER initiative advises that a country's Ministry of Health should collaborate with the ministry responsible for licensing regulations, to jointly assess how any changes might affect alcohol-related harm, including impacts on health¹⁶.

In this case, however, the Department of Health and Social Care (DHSC) does not appear to have been involved. Instead, the reforms were led by the Department of Business and Trade and the Home Office. The licensing taskforce included representatives from several other Departments - including HM Treasury, Home Office, Ministry of Housing, Communities and Local Government, and Department for Culture, Media and Sport - but not from DHSC or any public health experts¹⁷. This is a deeply concerning approach given the immense public health implications of the proposals, though it is positive that the taskforce included police and local authority representatives.

Not only has the Government failed to follow international best practice on health representation, but the licensing taskforce included industry representatives, and

¹² The SAFER technical package: five areas of intervention at national and subnational levels. Geneva: World Health Organization; 2019. Licence: CC BY-NC-SA 3.0 IGO. Available [online](#).

¹³ The SAFER technical package: five areas of intervention at national and subnational levels. Geneva: World Health Organization; 2019. Licence: CC BY-NC-SA 3.0 IGO. Available [online](#).

¹⁴ The SAFER technical package: five areas of intervention at national and subnational levels. Geneva: World Health Organization; 2019. Licence: CC BY-NC-SA 3.0 IGO. Available [online](#).

¹⁵ The SAFER technical package: five areas of intervention at national and subnational levels. Geneva: World Health Organization; 2019. Licence: CC BY-NC-SA 3.0 IGO. Available [online](#).

¹⁶ The SAFER technical package: five areas of intervention at national and subnational levels. Geneva: World Health Organization; 2019. Licence: CC BY-NC-SA 3.0 IGO. Available [online](#).

¹⁷ HM Treasury (2025). Terms of Reference and taskforce member list. Available [online](#).

was even co-chaired by Nick McKenzie, CEO of Greene King¹⁸. The SAFER Initiative makes clear that the alcohol industry is not supportive of measures to reduce alcohol availability and that policy development processes must be protected from undue influence¹⁹, something the UK Government has clearly failed to ensure.

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

The Licensing Act applies to both on and off trade. The current legislation does not split them, and the taskforce proposals do not outline how this could work in practice without full legislative reform.

We do however agree that the UK Government should split the licensing system to introduce a separate regime for off-sales premises, including remote sales, that is better equipped to take account of public health concerns and the legal limitations of the current licensing regime as outlined elsewhere in this response. Millions of us experience health issues caused by alcohol, from poor sleep, headaches and anxiety to injuries, relationship issues, violence, chronic illness, including cancer,²⁰ and premature death.²¹ Both alcohol-specific and alcohol-related deaths are at a record high. It is therefore vital that the Licensing Act is sophisticated and robust enough to be able to address harms in the areas and venues where they are most concentrated, without unduly penalising other licensed premises where their impact on harms is vastly different. Neither the existing Licensing Act, nor these new proposals to reform it, currently do that.

Responsibility for governance of off-sales premises should be moved into a separate licensing regime. Ideally, this should have at least some level of input and oversight

¹⁸ HM Treasury (2025). Terms of Reference and taskforce member list. Available [online](#).

¹⁹ The SAFER technical package: five areas of intervention at national and subnational levels. Geneva: World Health Organization; 2019. Licence: CC BY-NC-SA 3.0 IGO. Available [online](#).

²⁰ Behavioural Insights Team (2025) [Alcohol harm across the drinking spectrum](https://alcoholchange.org.uk/publication/alcohol-harm-across-the-spectrum-of-drinking). <https://alcoholchange.org.uk/publication/alcohol-harm-across-the-spectrum-of-drinking>

²¹ Department for Health and Social Care (2025) Alcohol-related mortality <https://fingertips.phe.org.uk/profile/local-alcohol-profiles>

from local and national public health experts, to account for the significant health harms currently arising from these types of licensed premises, and to ensure adequate consideration of health impacts. This would enable legislation on licensing to specifically address any concerns about alcohol pricing and promotion stemming from off-trade settings that are not always replicated in the same way (or at the same scale) across on-trade settings.

The Licensing Act (2003) should also be revised to regulate and restrict remote (such as online, telephone, app-based or rapid home delivery) sales of alcohol nationally, given the reported rise in such sales and harms for some groups following the COVID-19 pandemic. Again, this is an action recommended by the WHO and others as part of the SAFER initiative²². This should be informed by a review that goes beyond the existing Home Office work to improve age-verification, and considers the contribution of these sales to overall availability and harms, and how they undermine local efforts to address the cumulative impact of alcohol outlets in a given area.

The average English postcode has 31 outlets selling alcohol within a 1km walking distance of its centre.²³ On 31 March 2024, there were 171,410 premises permitted to sell alcohol in England and Wales.²⁴ Of these, 37,126 were for on-sales only, 53,418 for off-sales only, and 80,866 for both on-sales and off-sales. In the UK, a huge majority of people buy their alcohol from supermarkets (87%), with a significant number of people reporting that they also buy alcohol at bars and pubs (51%), and restaurants (35%).²⁵

The licensing regime should treat on-trade and off-trade premises differently, as they pose distinct risks and opportunities for reducing alcohol harm. Alcohol sold in the off-trade, such as shops and supermarkets, is linked to more harm than alcohol sold in the on-trade, such as pubs and bars.²⁶ When on-trade outlets were closed during the COVID-19 pandemic, there was only a very small decrease in the proportion of violence that was alcohol-related, from 15.5% to 12.8%.²⁷ Closures did not lead to significant differences in the level or proportion of domestic violence flagged as alcohol-related. This suggests that the impact of alcohol sold in off-trade sites, not only on-trade, should be considered as a component of efforts to reduce violence.

²² The SAFER technical package: five areas of intervention at national and subnational levels. Geneva: World Health Organization; 2019. Licence: CC BY-NC-SA 3.0 IGO. Available [online](#).

²³ Angus, C., Holmes, J., Maheswaran, R., Green, M. A., Meier, P., and Brennan, A. (2017). Mapping Patterns and Trends in the Spatial Availability of Alcohol Using Low-Level Geographic Data: A Case Study in England 2003-2013. *Int J Environ Res Public Health*, 14(4), 406. <https://doi.org/10.3390/ijerph14040406>

²⁴ Home Office (2024). Alcohol licensing, England and Wales, April 2023 to March 2024.

<https://www.gov.uk/government/statistics/alcohol-licensing-england-and-wales-april-2023-to-march-2024/alcohol-licensing-england-and-wales-april-2023-to-march-2024#premises-licences>

²⁵ YouGov (2025). The changing landscape of alcohol and non-alcoholic drink preferences in the UK. [Accessed 8 October 2025] <https://yougov.com/en-gb/articles/51406-the-changing-landscape-of-alcohol-and-non-alcoholic-drink-preferences-in-the-uk>

²⁶ Bhattacharya, A. et al. (2018). How dependent is the alcohol industry on heavy drinking in England? *Addiction*, 113(12), pp. 2225-2232.

²⁷ Lightowlers, C., and Bryant, L. (2023). Off-trade alcohol availability and violence: Assessing the impact of on-trade outlet closures. Institute of Alcohol Studies and University of Liverpool. <https://www.ias.org.uk/wp-content/uploads/2023/08/Off-trade-alcohol-availability-and-violence-Assessing-the-impact-of-on-trade-outlet-closures.pdf>

Alcohol sold in the off-trade such as supermarkets, corner shops, and through online deliveries, has become much more affordable, more quickly, than alcohol in pubs over the last 30 years.²⁸ Alcohol purchased in the off-trade is often significantly cheaper, particularly in the absence of minimum unit pricing in England, which allows high-strength alcohol to continue to be sold at very low prices. The affordability of alcohol is an increasingly important factor given the ongoing cost of living crisis²⁹, as it encourages people to purchase cheaper off-trade alcohol. Off-trade alcohol is also more easily accessible than in the on-trade, with longer opening hours, and is often consumed at home or in public spaces.

People drinking at home tend to drink more alcohol, as this is an unsupervised environment,^{30 31 32} where people also tend to pour larger measures than what would be served in the on-trade.³³ Home Office analysis has found that alcohol was a factor in nearly half of intimate partner homicide cases.³⁴ Off-trade alcohol is also linked to domestic abuse and child neglect.³⁵ Despite this, home drinking in particular has been described as a “blind spot” for alcohol harm reduction.³⁶ Tackling the round the clock sale of cheap, strong alcohol will therefore make local areas safer and healthier places to live.

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

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

²⁸ Angus, C. (2025). @victimofmaths.bsky.social April 2025

²⁹ Babor, T., Caetano, R., Casswell, S. et al. (2010). *Alcohol: no ordinary commodity—research and public policy*, 2nd edn. Oxford: Oxford University Press.

³⁰ Foster, J. H., and Ferguson, C. S. (2012). Home Drinking in the UK: Trends and Causes. *Alcohol and Alcoholism*, 47(3), pp. 355-358.

³¹ Callinan, S., and MacLean, S. (2020). COVID-19 makes a stronger research focus on home drinking more important than ever. *Drug Alcohol Rev*, 39(6), pp. 613-615.

³² Davies, E. L., Cooke, R., Maier, L. J., Winstock, A. R., and Ferris, J. A. (2021). Where and What You Drink Is Linked to How Much You Drink: An Exploratory Survey of Alcohol Use in 17 Countries. *Substance Use & Misuse*, 56(13), pp. 1941-1950.

³³ Direct Line Group (2020). *One glass and over the limit – new study exposes drink drive danger of home measures*. Direct Line Group. <https://www.directlinegroup.co.uk/en/news/brand-news/2020/one-glass-and-over-the-limit---new-study-exposes-drink-drive-dan.html>

³⁴ Home Office (2016). Domestic Homicide Reviews: Key Findings from Analysis of Domestic Homicide Reviews. <https://assets.publishing.service.gov.uk/media/5a81b1c5e5274a2e87dbf034/HO-Domestic-Homicide-Review-Analysis-161206.pdf>

³⁵ Laslett, A. M., Edwards, N., Allsop, S., Pnicks, W., and Chikritzhs, T. (2022). Community-Level Alcohol Availability and Child Maltreatment: A Statewide Panel Analysis Over 13 Years. *Journal of Studies on Alcohol and Drugs*, 83(6), pp. 849–856.

³⁶ Reynolds J, Wilkinson C. (2020). Accessibility of ‘essential’ alcohol in the time of COVID-19: casting light on the blind spots of licensing? *Drug Alcohol Rev*, 39(4), pp. 305-308.

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?

- 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

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.

There is also a need to consider the impact this proposed change could have on effective enforcement of licensing, which is a critical factor in ensuring compliance³⁷. The ability to revoke a licence for noncompliance serves as a strong deterrent and conflicts with using fewer appeal decisions as a measure of success. Additionally, licence renewals should only be granted to establishments that demonstrate full adherence to licensing requirements.

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

³⁷ The SAFER technical package: five areas of intervention at national and subnational levels. Geneva: World Health Organization; 2019. Licence: CC BY-NC-SA 3.0 IGO. Available [online](#).

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?

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

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?

- 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

This proposal is unclear, and the wording above is incorrect. It should read 'minor *variations* are small changes that do not significantly impact licensing objectives'. The proposal does not accurately distinguish between licensing conditions and licensing variations. This is a serious error, and responses to this proposal should not be considered, nor should the proposal be taken forward.

The proposal appears to be to streamline the process for submitting minor variations to alter conditions. This is a significantly different principle to an 'amnesty' on conditions. An 'amnesty' on actual conditions will encourage the mass removal of a wide range of obligations and could lead to an increase in harmful and irresponsible retail practices.

In addition to the challenges selected above, the amnesty poses risks to public health. Licensing conditions play a crucial role in reducing harm caused by alcohol. The section 182 guidance already outlines principles that conditions should be tailored to specific premises and events. Conditions are sensible measures that premises are required to put in place to mitigate risks from the sale and consumption of alcohol. These are implemented based on local evidence gathering and public consultation as required by the current extensive and regularly updated Statutory Guidance.

The effectiveness of the Cardiff Model for reducing violence and saving public funds shows how important conditions based on local evidence are.³⁸ This model involves

³⁸ Florence C, Shepherd J, Brennan I, Simon T. (2011) Effectiveness of anonymised information sharing and use in health service, police, and local government partnership for preventing violence related injury: experimental study and time series analysis. BMJ. 2011 Jun 16 <https://pmc.ncbi.nlm.nih.gov/articles/PMC3116927/>

anonymised information sharing between emergency departments, police and Licensing Authorities, enabling the identification of violence ‘hotspots’ and prevention measures, including licensing conditions. A Home Office evaluation of the Cardiff model estimated that if just 5% of community safety partnerships in England and Wales implemented this model, it would save public services £858 million over ten years.³⁹

In addition, many licensed premises have bespoke sets of conditions that were imposed as a result of Hearings and the Appeals process. Local decisionmakers in multiple examples have judged these conditions as necessary for the safe management of licensed premises, particularly in the case of larger venues, late-trading premises and premises whose licence has been subject to Review.

As the taskforce report and consultation survey note, there is already a process through which licence holders can request amendments or removal of conditions. For minor variations, licence holders can already apply to make small changes, using the minor variation process. This process has a smaller fee and the timeframe for decisions for these is already 15 working days. The current process is also already highly permissive, with licensing authorities required to make the decision based on the impact of the variation on the licensing objectives.

In this context, the effect of such an ‘amnesty’ would be to encourage large volumes of applications from licence holders at the same time, rather than the current system in which licence holders decide to apply for minor variations when the need arises.

The taskforce report argues that one of the reasons for such an ‘amnesty’ is ‘that businesses are concerned around opening up their licence to greater scrutiny or ‘additional undertakings’. This misrepresents democratic review, scrutiny and accountability as mere ‘red tape’. However, scrutiny of licences is vital for creating thriving and inclusive local economies. It enables local decisionmakers to ensure that those who live, work and play in their communities are protected from harm. These safeguards should not be removed solely to reduce business ‘undertakings’.

The Government response to the taskforce report claims that the national mandatory conditions such as those governing irresponsible drinks promotions are ‘outdated’.⁴⁰ These conditions are evidence-based guardrails which were put in place as a result of a 2008 Home Office/KPMG report that found high prevalence of intoxication and incapacitation in licensed premises serving ‘double shots’ as default and serving ‘free-poured’ spirits based cocktails. The conditions allow consumers informed choice about how much alcohol they are consuming and to pace this, reducing harm. Recent research analysing widespread heavy drinking practices in Great Britain

³⁹ Home Office (2021) Introducing public health measures impact assessment 2019 (accessible version) <https://www.gov.uk/government/consultations/serious-violence-new-legal-duty-to-support-multi-agency-action/outcome/introducing-public-health-measures-impact-assessment-2019-accessible-version>

⁴⁰ Department for Business and Trade (2025) Policy paper Licensing policy sprint: joint industry and HM government taskforce report <https://www.gov.uk/government/publications/licensing-taskforce-report-and-government-response/licensing-policy-sprint-joint-industry-and-hm-government-taskforce-report>

highlights the continuing need for responsible sales practices that do not incentivise higher levels of consumption.⁴¹

As outlined in our response to question 4, licensing authorities are already severely restricted in the grounds on which they can refuse licence applications. The Government should take this opportunity of reviewing and reforming the licensing system to bring licensing regulations up to date to account for the shift in alcohol purchasing patterns and harms caused by off-sales consumption, especially alcohol delivery.

Although the above outlines that the 'amnesty' would focus on the on-trade only, it is not clear from the consultation what the mechanism would be to ensure this would not also encourage huge numbers of additional applications from the off-trade.

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.

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

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

⁴¹ Holmes, J., Sasso, A., Hernández Alava, M., Borges Neves, R., Stevely, A.K., Warde, A and Meier, P.S. (2024) 'How is alcohol consumption and heavy episodic drinking spread across different types of drinking occasion in Great Britain: An event-level latent class analysis' *International Journal of Drug Policy* 127. <https://www.sciencedirect.com/science/article/pii/S0955395924000999>

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?

There is a risk in reducing democratic accountability and consultation, unless meaningful steps are taken to place the notices elsewhere, including non-digital spaces. Local newspapers have also raised concerns that these advertisements form an important part of their revenue streams, and removing them would put further financial pressure on a sector already facing declines in revenue and significant fiscal pressures. This brings into question the ‘economic growth’ argument of these reforms, with a clear distinction between large businesses which these reforms are attempting to use to drive economic growth, and other (potentially smaller, local businesses) that will be quietly penalised as a result of these reforms.

Overall, there has been strong dissatisfaction with the proposal to remove the requirement for changes to alcohol licences to be advertised in local print media. The National Union of Journalists⁴² and many others have joined a campaign opposing this change⁴³.

Additionally, the WHO identifies community engagement as best practice in alcohol licensing processes, which this proposal may hinder⁴⁴. Community members often have unique insights and firsthand experiences into how alcohol establishments affect their surroundings, as they are often among the first to experience associated harms⁴⁵.

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

NA

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

- Yes

⁴² HoldtheFrongPage.co.uk (2025). [Union backs industry campaign on alcohol licensing notices](#).

⁴³ The Yorkshire Post (2025) [Axing pub licensing notices would silence your voice – why we’re determined to stop plans](#).

⁴⁴ The SAFER technical package: five areas of intervention at national and subnational levels. Geneva: World Health Organization; 2019. Licence: CC BY-NC-SA 3.0 IGO. Available [online](#).

⁴⁵ [A public health perspective on alcohol establishments: licensing, density and locations](#). Brief 8, November 2022. Geneva: World Health Organization; 2022. Snapshot series on alcohol control policies and practice. Licence: CC BY-NC-SA 3.0 IGO

- 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 licensing activities?

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.

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

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

NA

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

NA

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

NA

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

NA

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

Granting pavement licences for fixed terms that require renewal strengthens enforcement and accountability⁴⁶. Renewal applications provide an opportunity to assess how the premises are operating and review the licence holder's record regarding infringements, complaints from neighbours, adherence to permitted hours, sales to underage and intoxicated persons, and compliance with safety, sanitary, and health standards.

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

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.

⁴⁶ [A public health perspective on alcohol establishments: licensing, density and locations](#). Brief 8, November 2022. Geneva: World Health Organization; 2022. Snapshot series on alcohol control policies and practice. Licence: CC BY-NC-SA 3.0 IGO

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?

The maximum number of TENS was already increased from 12 to 15 in 2016, as part of the previous Government's Deregulation Bill. A further increase threatens to make it easier for premises to regularly sidestep the commitments of a full licence and evade proper scrutiny. Retaining the current maximum of TENs would further weaken the premise that they are for exceptional and occasional use only. The pandemic-era relaxation allowing an increase in the maximum number should be regarded as a temporary emergency measure, not a policy precedent.

Whilst we understand the Government's stated intention to support venues hosting community events, the reality is that majority are used instead to broaden the scope of licensable activities within premises that already have an alcohol licence. For example, Westminster City Council reported to the House of Lords Select Committee on post-legislative scrutiny of the Licensing Act in 2017, that "of the 3,100 notices processed by the council every year, approximately 85% were to extend licensable activities in already licensed premises". Similarly, a submission from the Local Government Association provided the example of the annual Reading music festival,

which it said results in “floods of TENS from pubs and clubs that are looking to ride the wave of local business and dispense with all the hours and conditions that they would normally have to comply with”.⁴⁷ Thus extending the maximum number of TENS would mostly benefit commercial premises rather than community organisers.

As TENS can last more than one night, increasing the maximum number of TENS to 20 per year would allow them to be spread in such a way that licence holders could routinely extend opening hours throughout the year without changing their premises licence. In effect this would increase the ability for licence holders to side-step the licensing process, which is place to protect the public from harm.

Further, increasing the maximum number of TENS would add to the administrative burden on licensing authorities, not reduce it. This is because the change would likely increase the number of TENS giving notice. It could also result in increased objections prompted by concerns from local residents and/or businesses affected by the increased level of licensable activities authorised by the TENS. This would place an additional administrative burden on licensing authorities who would be required to consider the objections.

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?

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

⁴⁷ House of Lords (2017) Select Committee on the Licensing Act 2003 The Licensing Act 2003: post-legislative scrutiny. <https://publications.parliament.uk/pa/ld201617/ldselect/ldlicact/146/14602.html>

- Disagree
- Don't know
- Prefer not to say

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? If there were regular reviews, what timeframe would be appropriate?

- Agree
- Disagree
- Don't know
- Prefer not to say

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.⁴⁸ Representations from the police, local residents and the

⁴⁸ Brighton and Hove City Council (2025) Brighton & Hove City Council

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?

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 licensing policies. Please tell us if any special policies apply in your local area.

- Yes
- **No**
- Don't know
- Prefer not to say

The taskforce proposals undermine important efforts by licensing authorities to protect the public and reduce harm caused by alcohol.

Statements of Licensing Policy enable local authorities to produce guidance that meets the needs of their local community. This guidance, including the option to apply local conditions, supports licensing authorities to make case-by-case decisions about the impact of a given licence or variation to the promotion of the licensing objectives.

These are sensible, evidence-based measures. For example, late-night-levy schemes are based on the principle (and well- established evidence) that post-midnight trading (in particular) drives demand for policing and emergency health care support and that extra provisions are therefore needed in support of the Licensing Objectives.

Newcastle City Council operate one of the most long-established Late Night Levy schemes. This is an annual fee on licensed businesses that sell alcohol between midnight and 6 a.m. to help fund the costs associated with late-night alcohol sales,

such as policing and licensing. The money raised is split between the local authority and the police and can be used to support various interventions in the night-time economy, like additional static guarding by police at hot spots, an emergency health care drop-in centre and street pastor services.

‘Core hours’ enable licensing authorities to take account of different phases of the evening, night-time and late night economy, and the often differential impact of activities taking place on the licensing objectives. Restrictions to opening hours reduces harm caused by alcohol. There are a number of interesting international examples where this has been applied and generated positive results, for example:

- In the local authority of Stuttgart, a ban on the sale of alcohol between 10pm and 5am at off-licence premises led to a 7% reduction in alcohol-related hospitalisations among adolescents and young adults. There was also evidence of a decrease in the number of hospitalizations due to violent assaults due to the ban.⁴⁹
- Partial restrictions on off-sales of alcohol in Switzerland (banning off-sales after 8 or 9pm on Fridays and Saturdays, even with wine excluded from the measure) appeared to reduce hospital admissions for alcohol intoxication across a wide age range (ages 16–69 years).⁵⁰

Such measures are also recommended by the aforementioned SAFER initiative⁵¹.

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?

⁴⁹ Marcus J., Siiedler T. Reducing binge drinking? The effect of a ban on late-night off-premise alcohol sales on alcohol-related hospital stays in Germany. J Public Econ 2015; 123: 55–77.

⁵⁰ Wicki, M., Bertholet, N., & Gmel, G. (2020). Estimated changes in hospital admissions for alcohol intoxication after partial bans on off-premises sales of alcoholic beverages in the canton of Vaud, Switzerland: an interrupted time-series analysis. Addiction, 0–2.
<https://doi.org/10.1111/add.14967>

⁵¹ The SAFER technical package: five areas of intervention at national and subnational levels. Geneva: World Health Organization; 2019. Licence: CC BY-NC-SA 3.0 IGO. Available [online](#).

- 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

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 33 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 Q 33, because the question does not indicate the actual nature and scale of the changes being proposed.

Question 34 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?

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.

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?

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

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?

NA

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

NA

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?

We do not support the proposal to introduce hospitality, leisure and cultural zones. See our answer to question 43 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?

There is no reference to specific proposals for designated zones in the licensing taskforce report. However, the press release accompanying the call for evidence suggests that these would be used to 'fast track' the licensing process. We do not support this proposal as it undermines the ability of local authorities to properly scrutinise the impact of new licences or amendments to existing licences on their local communities. As we have outlined elsewhere in our response, the current licensing regime is already highly permissive. Creating 'fast track' routes for licences removes existing guardrails for public protection. The proposals would make it easier for alcohol to be sold in more places, for longer periods, even in areas where local authorities have identified adverse impacts caused by high availability of alcohol.

The Licensing Act also applies to off-sales, including the proliferation of rapid alcohol delivery. This proposal will make it even more difficult for local authorities to protect their residents from 24/7 alcohol delivery, including from storage facilities and warehouses that often deliver to wide catchment areas.⁵²

52. What indicators might be appropriate for local authorities to assess the impact of zones?

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?

NA

⁵² Sharpe, C., Bhuptani, S., Jecks, M., Sheron, N., Henn, C., Burton, R. (2024) Availability of Alcohol on an Online Third-Party Delivery Platform Across London Boroughs, England: Exploratory Cross-Sectional Study. JMIR Formative Research 8 https://pmc.ncbi.nlm.nih.gov/articles/PMC11245658/pdf/formative_v8i1e54587.pdf

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

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

Higher levels of alcohol availability are linked to higher rates of crime and worse public safety in our neighbourhoods and high streets. The deregulation of licensing proposed will increase the availability of alcohol and make it more difficult for local authorities to implement local protections on its sale and consumption.

Emerging evidence suggests that frontline services, including the police, find it hard to manage the impact of greater availability of alcohol especially later at night. Later opening hours lead to shifts in violence to later at night and a pull on police officers from local communities to manage both violent and vulnerable people. Any intention to have 'safer streets' is not well served by these proposals.⁵³

The annual cost of alcohol-related crime and disorder in England alone is already estimated at £14.58 billion.⁵⁴ These proposals not only threaten to further accelerate those costs, but offer no evidence of the desired positive impact to the on-trade and hospitality more widely either. With such a poor cost-benefit projection for these reforms, vocal opposition across the public sector, and a long list of potential (and harmful) unintended consequences, we reiterate our opposition to these proposals.

The impacts of alcohol availability are felt most sharply in the most deprived areas of England and Wales. People in lower socioeconomic status groups are more likely to experience frequent alcohol-related antisocial behaviour. Around half of those who experience alcohol-related ASB deal with this every week or more often.⁵⁵

Greater availability of alcohol - through more outlets or longer hours - is also associated with higher levels of violence, including domestic and sexual violence against women.⁵⁶ The potential knock-on impacts of licensing changes to the safety of women and girls both in public spaces and in the home should be very seriously considered in any proposals. Home Office analysis has found that alcohol was a factor in nearly half of intimate partner homicide cases.⁵⁷ Alcohol is not the cause of abuse, but its role in intensifying and complicating abusive situations cannot be ignored. In England and Wales in 2022/23 victim-survivors of partner abuse reported that the offender was under the influence of alcohol in 13% of incidents.⁵⁸ Licensing

⁵³ Mitchell et al. (2025). 'It's a bit of a mess': The impact of later alcohol trading hours for bars and clubs in Scotland according to qualitative interviews with local stakeholders. Forthcoming paper from the Evaluating Later/expanded premises hours for alcohol in the night-time (ELEPHANT) study, funded by the NIHR Public Health Research programme.

⁵⁴ Institute of Alcohol Studies (2024). [The Costs of Alcohol to Society](#).

⁵⁵ Bryant, L. (2020) [Inequalities in victimisation: alcohol, violence, and anti-social behaviour](#). Institute of Alcohol Studies.

⁵⁶ Institute of Alcohol Studies (2020). Alcohol and domestic abuse in the UK

⁵⁷ Home Office (2016). Domestic Homicide Reviews: Key Findings from Analysis of Domestic Homicide Reviews.

⁵⁸ Office for National Statistics (2023). [Partner abuse in detail](#).

changes designed to encourage even greater purchase and consumption of alcohol, risks both increasing and intensifying future harms against women and girls.

Alcohol can also be used as a perceived coping mechanism for those experiencing violence. Studies have found significant levels of alcohol use amongst both perpetrators and victim-survivors of domestic abuse, and similarly high levels of abuse perpetration and/or victimisation among people receiving help for alcohol problems.⁵⁹

The proposals set out by the taskforce will undermine the public protection objective of licensing, by allowing even greater availability of alcohol and blocking local authorities' ability to put sensible guardrails on its sale. The proposals will block attempts by national and local government to make our streets safer and will do nothing to prevent the harm caused by rapid alcohol delivery and strong alcohol sold at pocket money prices 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

⁵⁹ Brown, T.G. et al. (1998) *The incidence and characteristics of violent men in substance abuse treatment*. Addictive Behaviors, September-October 1998, 23(5):573-86, online, available at: <https://www.sciencedirect.com/science/article/abs/pii/S0306460398000045>; Spencer, C. M. et al. (2019) *Risk markers for physical intimate partner violence victimization: A meta-analysis*, Aggression and Violent Behavior, Vol. 44, pp. 8-17, online, available at: <https://www.sciencedirect.com/science/article/pii/S1359178917304238>; Cafferky, B.M. et al. (2018) *Substance use and intimate partner violence: A meta-analytic review*, Psychology of Violence, 8(1), 110–131, online, available at: <https://psycnet.apa.org/record/2016-44359-001>; Devries, K.M. et al. (2014) *Intimate partner violence victimization and alcohol consumption in women: a systematic review and meta-analysis*, Addiction, March 2014, 109(3):379-91, online, available at: <https://pubmed.ncbi.nlm.nih.gov/24329907/>

- Prefer not to say

The proposed reforms will further increase the availability of alcohol and undermine local protections around the sale of alcohol, which will worsen public health.

Alcohol consumption has a widespread negative impact in the UK. Three quarters of the UK population drink alcohol, and millions of us experience health harms caused by alcohol. Alcohol is a leading risk factor for death among those aged 15-49 in England.⁶⁰ Recent research suggests there may be a higher prevalence of cancer and cardiovascular disease in the UK among those who drink alcohol, even when consumption is below the low-risk guidelines of 14 units per week.⁶¹

Regarding cancer, it is important to consider the impact these proposals will have on incidence and mortality in England and Wales. Alcohol is a well-established risk factor for seven cancers, including breast and bowel - two of the most common in the UK - and oesophageal, one of the hardest to treat⁶². As noted, these cancer risks are present even at low levels of consumption⁶³. Across the UK, alcohol is responsible for around 4% of all cancer cases, making it the sixth leading cause of cancer⁶⁴. In 2015, almost 17,000 new cancer cases attributed to alcohol were diagnosed - the equivalent of around 46 people receiving a devastating diagnosis every day⁶⁵.

Incidence of alcohol-related cancers is not declining, instead the opposite is projected. Modelling by the Institute of Alcohol Studies and Health Lumen suggests that if current trends of high-risk drinking persist and do not return to pre-pandemic levels, England could see an additional 18,785 cancer cases by 2035⁶⁶, placing considerable further pressure on the NHS.

Despite alcohol being classed as a Group 1 carcinogen, public awareness of its cancer risk remains worryingly low⁶⁷. Polling commissioned by the World Cancer Research Fund in March 2025 found that only 7% (1 in 14) of UK adults were aware that alcohol is a cause of cancer when asked unprompted⁶⁸. Additionally, a staggering 25% (1 in 4) of respondents think there are no health risks linked to alcohol at all.

⁶⁰ DHSC (2025) *Local Alcohol Profiles* [Accessed 24 September 2025]

⁶¹ Alcohol Change UK recently commissioned Behavioural Insights Team to carry out a large survey to explore the extent of alcohol harm across different levels of drinking. We can share pre-publication findings in confidence.

⁶² World Cancer Research Fund. *Alcoholic Drinks*. Available at: <https://www.wcrf.org/wp-content/uploads/2024/10/Alcoholic-Drinks.pdf>

⁶³ Alcohol Change UK. *Alcohol Harm Across the Drinking Spectrum*. 2025. Available online: <https://s3.eu-west-2.amazonaws.com/sr-acuk-craft/documents/Alcohol-harm-across-the-drinking-spectrum-2.pdf>

⁶⁴ Rungay, H., Shield, K., Charvat, H., Ferrari, P., Sornpaisarn, B., Obot, I., Islami, F., Lemmens, V. E., Rehm, J., & Soerjomataram, I. (2021). Global burden of cancer in 2020 attributable to alcohol consumption: A population-based study. *The Lancet Oncology*, 22(8), 1071–1080. [https://doi.org/10.1016/s1470-2045\(21\)00279-5](https://doi.org/10.1016/s1470-2045(21)00279-5)

⁶⁵ Brown, K.F., Rungay, H., Dunlop, C. *et al.* The fraction of cancer attributable to modifiable risk factors in England, Wales, Scotland, Northern Ireland, and the United Kingdom in 2015. *Br J Cancer* 118, 1130–1141 (2018). doi: [10.1038/s41416-018-0029-6](https://doi.org/10.1038/s41416-018-0029-6)

⁶⁶ Sadie Boniface, Joshua Card-Gowers, Alex Martin, Lisa Retat and Laura Webber (2022). *The COVID hangover: Addressing long-term impacts of changes in alcohol consumption during the pandemic*. Institute of Alcohol Studies and Health Lumen. Available [online](#)

⁶⁷ World Cancer Research Fund. *Alcoholic Drinks*. Available at: <https://www.wcrf.org/wp-content/uploads/2024/10/Alcoholic-Drinks.pdf>

⁶⁸ The Guardian (2025) [Alcohol should have labels warning drinkers of cancer risks, charities say](#).

This dangerously low awareness of alcohol's health harms reflects the failure of national alcohol policy to protect the public. In England, there remains an absence of a range of evidenced-based policies including minimum unit pricing, sufficient marketing restrictions, mandatory labelling, and a comprehensive National Alcohol Strategy. The Government's proposed licensing reforms will further weaken this policy landscape – and it is the public, and already overstretched public services, who will pay the price.

Ultimately, the Government has a duty to protect the public from alcohol's many harms. Yet far from shifting public perception or reducing health risks, these proposals would reinforce the normalisation of alcohol consumption, even at high risk levels, across British society.

It isn't true that alcohol-related harms are only experienced by people with alcohol dependence,⁶⁹ with impacts including poor sleep and dental health, more days off work and mental ill-health, injuries and chronic illness. The latest evidence suggests this will only get worse without action.⁷⁰

The cost of alcohol-related harm each year is estimated at £27.44 billion in England and more than £1 billion in Wales. These include costs linked to health, crime, and lost productivity.⁷¹ The economic costs are likely to be higher than this. As the Cabinet Office has pointed out,⁷² most figures are likely to underestimate the cost of alcohol to society. Acute harms caused by alcohol show up in our emergency services, with the state spending £1.9 billion every year dealing with preventable alcohol-related harm in ambulances and A&E.⁷³

Alcohol is thought to be a factor in up to 40% of emergency department attendances, rising to as high as 70% in peak hours.⁷⁴ Robust studies have estimated that between 10 and 16% of all ambulance call-outs are caused by alcohol.^{75 76} Ambulance call-outs are driven upwards by both on and off-sales of alcohol – alcohol related call-outs fell sharply during the first covid-lockdown (when pubs and nightclubs were closed), but returned to pre-lockdown levels even before pubs reopened, as off-sales consumption rose.⁷⁷

⁶⁹ Behavioural Insights Team (2025) [Alcohol harm across the drinking spectrum](#).

⁷⁰ Sheffield University (2023). [Modelling the impact of changes in alcohol consumption during the COVID-19 pandemic on future alcohol-related harm in England](#).

⁷¹ Alcohol harm costs England £27.44 billion, Northern Ireland as much as £900 million, Scotland between £5-10 billion, and Wales more than £1 billion. Institute of Alcohol Studies (2024). [£27.4 billion cost of alcohol harm in England every year](#); Northern Ireland Department of Health (n.d.). [Substance Use \(Use of Alcohol & Other Drugs\)](#); Bhattacharya, A. (2023). [Getting in the spirit? Alcohol and the Scottish economy](#); Public Health Wales (n.d.). [Alcohol](#).

⁷² Cabinet Office (2003). [Alcohol misuse: How much does it cost?](#)

⁷³ Institute of Alcohol Studies (2024). [The Costs of Alcohol to Society](#).

⁷⁴ Institute of Alcohol Studies (2015). [Alcohol's impact on emergency services](#).

⁷⁵ Martin, N., Newbury-Birch, D., Duckett, J., Mason, H., Shen, J., Shevills, C., & Kaner, E. (2012). A Retrospective Analysis of the Nature, Extent and Cost of Alcohol-Related Emergency Calls to the Ambulance Service in an English Region. *Alcohol and Alcoholism*, 47(2), 191–197. <https://doi.org/10.1093/alcalc/aqr158>

⁷⁶ Manca, F., Lewsey, J., Waterson, R., Kernaghan, S. M., Fitzpatrick, D., Mackay, D., Angus, C., & Fitzgerald, N. (2021). Estimating the Burden of Alcohol on Ambulance Callouts through Development and Validation of an Algorithm Using Electronic Patient Records. *International Journal of Environmental Research and Public Health*, 18(12), 6363.

⁷⁷ Fitzgerald N. et al. Lockdown and licensed premises: COVID-19 lessons for alcohol policy. - *Drug Alcohol Rev.* 2022;41(3):533-545. <https://onlinelibrary.wiley.com/doi/full/10.1111/dar.13413>

Ambulance staff report that alcohol-related ambulance calls are common, time-consuming and frustrating to deal with and have ‘major knock-on effects’. Many such calls involve tending to patients in difficult environments in bars or clubs, or on the street during which staff reported regularly experiencing violence and harassment from intoxicated patients or bystanders.⁷⁸

The 2003 Licensing Act has resulted in steady growth in the number of licensed premises in the UK, including in 24-hour premises.⁷⁹ The proposed changes to the licensing regime will increase alcohol availability and block the work happening elsewhere in national and local government to improve public health. Managing the availability of alcohol is an important lever for local decision-makers to reduce harm in their communities. Where alcohol is more easily accessible, it is more likely to be consumed in higher quantities. Greater availability is related to higher levels of hospitalisations, alcohol-related disorder and violence, and deaths caused by alcohol.⁸⁰ Increased availability results in:

- Easier access to shop-bought or delivered alcohol, making purchases more frequent, due to convenience, increasing consumption and alcohol-related ill-health;
- Continued drinking late at night, increasing levels of drunkenness, accidents, violence, acute illness;
- Greater visibility of alcohol marketing and promotional deals, triggering impulse purchases, making it hard for people in recovery or trying to cut down, and forming an important element of alcohol marketing to which children and adults are exposed.⁸¹

England and Wales already have much higher alcohol availability than other UK nations. They are the only part of the UK or Ireland that routinely permits 24-hour licences. Those licences grew by 31% from 2018 to 2022 to 10,600 – mainly due to greater numbers of convenience stores. Pubs, bars and nightclubs combined make up less than 10% of 24-hour premises.⁸² In the rest of the UK/Ireland, off-licence hours are set nationally and off-licences must close no later than 10/11pm.

The steep rise in the availability of cut-price, instantly available alcohol has meant fewer people consuming alcohol in pubs, bars and restaurants, instead drinking at

⁷⁸ Uny et al. (2025). “‘It has some major knock-on effects’: ambulance clinicians’ experiences of attending alcohol-related call-outs and perceived impact on the Scottish Ambulance Service’. Forthcoming IMPAACT study paper, funded by Scottish Gov. Chief Scientist Office.

⁷⁹ <https://www.gov.uk/government/statistics/alcohol-licensing-england-and-wales-april-2023-to-march-2024>

⁸⁰ Babor, T.F., and others, (2023) *Alcohol: No Ordinary Commodity: Research and public policy, 3rd edn* Oxford: Oxford University Press; Maheswaran, R., Green, M.A., Strong, M., Brindley, P., Angus, C. and Holmes, J. (2018) *Alcohol outlet density and alcohol related hospital admissions in England: a national small-area level ecological study* *Addiction* 113(11); Nicholls J., Fitzgerald N., Maclean, J., Valiente, R., Cook, M., Shortt, N., Burton, R., Wilson, L., Morris, D., Clemens, T., Angus, C., Pearce, J., Angus, K. and Holmes, J. (2024). *Independent Review of the Liquor Licensing System in Northern Ireland including the Surrender Principle*. Stirling: University of Stirling; Lightowlers, C. and Bryant, L. (2023) *Off-trade alcohol availability and violence: Assessing the impact of on-trade outlet closures* Institute of Alcohol Studies.

⁸¹ O'Donnell R et al. (2023). Mechanisms of impact of alcohol availability interventions from the perspective of 63 diverse alcohol licensing stakeholders: a qualitative interview study. *Drug Educ Prev Polic.* 2023;31(3), 338–347.

⁸² Home Office (2022) Alcohol and late night refreshment licensing England and Wales, year ending 31 March 2022 <https://www.gov.uk/government/statistics/alcohol-and-late-night-refreshment-licensing-england-and-wales-31-march-2022>

home. England/Wales is an international outlier in permitting 24-hour delivery of alcohol. The number of 24-hour off-licence premises has almost trebled in recent years (over 4,000 extra premises in 2021/22 from 2008/09), and overall off-licence numbers have risen 23%. Furthermore, many premises now offer rapid delivery, including from warehouses (without a shopfront), delivering round-the-clock, without proper support for drivers. This 24/7 availability makes it easier for people to carry on drinking when they would otherwise have stopped, and for children and young people to buy alcohol, without the same level of safeguards that can be found in the on-trade.⁸³

We agree that the licensing regime needs reform. The current, highly permissive licensing system already imposes serious limitations on local authorities in reducing harm and the negative impacts on health, public safety and community wellbeing caused by alcohol.⁸⁴ It is very difficult, in the current regime, for decisionmakers to take a population-level approach to local needs around the sale and consumption of alcohol.⁸⁵ The predominantly case by case approach requires evidence of the impact of an individual venue on the licensing objectives, and does not require a consideration of public health impacts. This piecemeal, permissive approach does not reflect the system-level impacts of the sale of alcohol, including health impacts that emerge over the longer term, such as cancer, and harms that don't sit neatly within geographical boundaries.⁸⁶

Nevertheless, despite the constraints of the current system, local authorities have been working hard to promote the licensing objectives and protect their communities, using data on harms including violence and hospitalisations to inform statements of licensing policy⁸⁷ and introducing local conditions or restrictions to mitigate harm.⁸⁸

59. In reforming the licensing system to promote economic benefits, what measures can be taken to promote public health?

If the Government wants to empower local authorities to promote public health and wellbeing, reduce A&E admissions for acute alcohol harm, tackle chronic illness, including cancer, and address the highest ever rates of alcohol-related deaths, the above proposals should not be taken forward.

The Government has said it hopes to 'breathe new life into the high street' with these proposals. However, further deregulation of licensing will have the opposite effect, benefiting large pub-owning companies and supermarkets and big multinational

⁸³ Alcohol Change UK (2024) Handle with care: The need for responsible alcohol delivery <https://alcoholchange.org.uk/blog/handle-with-care-the-need-for-responsible-alcohol-delivery>

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⁸⁵ Nicholls J., Fitzgerald N., Maclean, J., Valiente, R., Cook, M., Shortt, N., Burton, R., Wilson, L., Morris, D., Clemens, T., Angus, C., Pearce, J., Angus, K. and Holmes, J. (2024). *Independent Review of the Liquor Licensing System in Northern Ireland including the Surrender Principle*.

⁸⁶ Nicholls, J. (2015) *Public Health and Alcohol Licensing in the UK Challenges, Opportunities, and Implications for Policy and Practice* *Contemporary Drug Problems* 42(2). Stirling: University of Stirling.

⁸⁷ Local Government Association (2021). *Licensing Act 2003 - Councillor's handbook (England and Wales)*. <https://www.local.gov.uk/publications/licensing-act-2003-councillors-handbook-england-and-wales-0>

⁸⁸ Local Government Association (2021). *Licensing Act 2003 - Councillor's handbook (England and Wales)*. <https://www.local.gov.uk/publications/licensing-act-2003-councillors-handbook-england-and-wales-0>

alcohol producers, rather than local pubs and community venues.^{89 90} Although this consultation focuses on the on-trade, the Licensing Act also applies to the off-trade (including off-licences, supermarkets and alcohol delivery retailers). As such, the deregulation outlined will enable an even steeper rise in the 24/7 availability of alcohol, including that sold from warehouses and storage facilities that do not contribute to bustling high streets.⁹¹

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

The fundamental change to the purpose of the licensing system proposed will undermine work by local licensing authorities to protect the most vulnerable groups in their communities.

The proposals will have a disproportionate impact on the most economically deprived groups, as well as increasing violence against women and girls.

Increased alcohol availability has a greater negative impact on the safety and health of the most deprived groups. People living in deprived areas are many times more likely to have an alcohol-related hospital admission or die of an alcohol-related cause, despite these groups tending to drink less than those in higher income groups.⁹²

This is known as the alcohol harm paradox⁹³. Researchers have also linked alcohol consumption with socioeconomic inequalities in life expectancy, emotional well-being, child development, and various health conditions, including alcohol-related cancer⁹⁴.

According to Public Health England, the incidence of alcohol-related cancers, which include those of the mouth and throat, oesophagus, colorectum, liver, stomach, and breast, were higher in the most deprived decile (41.36 per 100,000 persons) than in any other group from 2015-2017⁹⁵. Alcohol-related head and neck cancers are also two to three times more common in the most disadvantaged groups compared to the

⁸⁹ Campaign for Pubs (2025) Publicans react with fury at claims that later opening hours will save pubs and boost economic growth <https://campaignforpubs.org.uk/publicans-react-with-fury-at-claims-that-later-opening-hours-will-save-pubs-and-boost-economic-growth/>

⁹⁰ Cary, B., Crossman, P., Deakin, R., Sidgwick, K., Thurnell-Read, T. and Wells, V. (2025) A pint-sized conversation: publicans, brewers, and academics on the UK beer, pub and brewing industry, *Journal of Marketing Management*, 41:7-8, 781-800 <https://www.tandfonline.com/doi/full/10.1080/0267257X.2025.2520653>

⁹¹ Sharpe, C., Bhuptani, S., Jecks, M., Sheron, N., Henn, C., Burton, R. (2024) Availability of Alcohol on an Online Third-Party Delivery Platform Across London Boroughs, England: Exploratory Cross-Sectional Study. *JMIR Formative Research* 8 https://pmc.ncbi.nlm.nih.gov/articles/PMC11245658/pdf/formative_v8i1e54587.pdf

⁹² Boyd, J., Sexton, O., Angus, C. Meier, P., Purshouse, R.C. and Holmes, J. (2022) [Causal mechanisms proposed for the alcohol harm paradox—a systematic review](#), *Addiction* 117(1): 33-56

⁹³ Institute for Alcohol Studies (2020) [Alcohol and Health Inequalities](#)

⁹⁴ Institute for Alcohol Studies (2020) [Alcohol and Health Inequalities](#)

⁹⁵ [Local Alcohol Profiles for England \(2020\) Public Health Profiles](#)

least disadvantaged⁹⁶⁻⁹⁷, and alcohol accounts for a significant share of inequalities in cancer and liver disease mortality⁹⁸.

A combination of smoking and drinking further accelerates the risk of head and neck cancers⁹⁹, and smoking rates are known to be higher in deprived communities¹⁰⁰.

These inequalities in health outcomes are compounded by the social and environmental context in which alcohol is sold and consumed. Off-sales availability, and its associated harms, is also higher in more deprived areas. Availability and harms will increase if local powers to refuse licences or impose conditions are weakened.

Evidence shows that deprivation amplifies the negative effects of alcohol availability on violent crime.¹⁰¹ Greater availability of alcohol is also associated with higher levels of violence, including domestic and sexual violence against women.¹⁰² See our response to question 48 for more detail and evidence.

Increasing the availability of alcohol is likely to make evening, night-time and late-night economies more alcohol-focused, reducing choice, accessibility and undermining attempts to diversify the hospitality and entertainment offers in urban centres. This will have the knock-on effect of also undermining the promotion of community cohesion and the culturally-focused offers in venues and events programmes.

⁹⁶ Conway DI, Petticrew M, Marlborough H, Berthiller J, Hashibe M, Macpherson LMD (2008), [Socioeconomic inequalities and oral cancer risk: a systematic review and meta-analysis of case-control studies](#). Int J Cancer; 122(12): 2811-2819. doi:10.1002/ijc.23430

⁹⁷ Jones L, Bates G, McCoy E, Bellis MA (2015), [Relationship between alcohol-attributable disease and socioeconomic status, and the role of alcohol consumption in this relationship: a systematic review and meta-analysis](#). BMC Public Health; 15(1): 400. doi:10.1186/s12889-015-1720-7

⁹⁸ [Local Alcohol Profiles for England \(2020\) Public Health Profiles](#)

⁹⁹ Jun S, Park H, Kim UJ, Lee HA, Park B, Lee SY, Jee SH, Park H. The Combined Effects of Alcohol Consumption and Smoking on Cancer Risk by Exposure Level: A Systematic Review and Meta-Analysis. J Korean Med Sci. 2024 Jun 10;39(22):e185. doi: 10.3346/jkms.2024.39.e185

¹⁰⁰ Office for National Statistics (2023) [Deprivation and the impact on smoking prevalence, England and Wales: 2017 to 2021](#).

¹⁰¹ Lightowlers, C., Pina-Sánchez, J., & McLaughlin, F. (2021). The role of deprivation and alcohol availability in shaping trends in violent crime. European Journal of Criminology, 20(2), 738-757. <https://doi.org/10.1177/14773708211036081>

¹⁰² Institute of Alcohol Studies (2020). Alcohol and domestic abuse in the UK