

Reforming the licensing system – Call for Evidence

Template response – 1 hour version



Thank you for volunteering your time to help influence the UK Government's review on potential licensing reforms.

You can use the template responses below to [respond to the consultation](#).

If you are able to, please include your personal experiences related to alcohol harm. This could include experiences of antisocial behaviour, health problems, family problems, violence. These could be issues you have experienced at home, in your community or at work.

It will be more persuasive if you use your own words with any evidence we have shared.

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

Agree

Disagree

Don't know

Prefer not to say

Please explain your answer (text box)

The 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 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]

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.[2] 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.' [3]

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.

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.[4] 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.[5] 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.[6] 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).[7]

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 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.

- [1] Department for Health and Social Care (2025) Alcohol-related mortality [Accessed 18.09.2025] <https://fingertips.phe.org.uk/profile/local-alcohol-profiles/data#page/4/gid/1938132984/pat/159/par/K02000001/ati/15/are/E92000001/id/93763/age/1/sex/4/cat/-1/ctp/-1/yrr/1/cid/4/tbm/1/page-options/eng-vo-1>
- [2] 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>
- [3] 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>
- [4] Angus, C. (2025a). @victimofmaths.bsky.social April 1 2025
- [5] Iceland (2025). Frosty Jack's Cider 2.5L [Accessed 15 September 2025]
- [6] Angus, C. (2025b) @victimofmaths.bsky.social April 2025
- [7] 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.

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

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

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

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

Growth in the size of the sector and number of businesses

Lower rates of crime and ASB

Lower rates of alcohol-related harm

Fewer people appeal decisions

Other (please tell us below)

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

Agree

Disagree

Don't know

Prefer not to say

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

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

Removing minor conditions dating prior to 2005

Removing minor conditions since 2005

Removing non-minor conditions

Reducing costs to businesses

Reducing costs to consumers

Reducing non-compliance with conditions

Encouraging better relationships between premises and authorities

Other

None

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

Costs to businesses in making applications

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

Increased risks to public safety

Increased risk of noise or public nuisance

Increased risk of crime and disorder

Challenges to protect children from harm

Other

None

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

Yes

No

Don't know

Prefer not to say

19. In place of publication in print local newspapers, what alternative methods of publicising this information do you consider would be most effective in ensuring effective scrutiny, transparency and public awareness of licencing activities?

Notices displayed in the vicinity of the licensed venue

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

Council websites, newsletters or social media channels

Other

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

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

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

1 year

2-3 years

5 years

Permanent (with occasional reviews)

Other (please tell us below)

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

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

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

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

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

Agree

Disagree

Don't know

Prefer not to say

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

Agree

Disagree

Don't know

Prefer not to say

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

Yes

No

Don't know

Prefer not to say

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

Yes

No

Don't know

Prefer not to say

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

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

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

Yes

No

Don't know

Prefer not to say

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

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

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

Very positive

Positive

None

Negative

Very negative

Don't know

Prefer not to say

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

National Licensing Policy Framework

Licensing Condition Amnesty

Remove Newspaper Advertising Requirement

Outdoor Trading and Pavement Licences

Increase TENs Entitlement

Sunset Clause on Blanket Hours

Arbitration, Evidence and Data Protocol

Festivals and Events Licensing

Agent of Change Principle

None

Don't know

Prefer not to say

Why do you think this? (text box)

Higher levels of alcohol availability are linked to higher rates of crime and worse public safety in our neighbourhoods and high streets. The proposals 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.[1]

The annual cost of alcohol-related crime and disorder in England alone is already estimated at £14.58 billion.[2] 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.

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.

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.[3] 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.[4] 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.[5] Licensing changes designed to encourage even greater purchase and consumption of alcohol, risks both increasing and intensifying future harms against women and girls.

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.

[1] 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.

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

[3] Institute of Alcohol Studies (2020). Alcohol and domestic abuse in the UK.

[4] Home Office (2016). Domestic Homicide Reviews: Key Findings from Analysis of Domestic Homicide Reviews.

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

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

Very Positive

Positive

None

Negative

Very Negative

Don't Know

Prefer not to say

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

National Licensing Policy Framework

Licensing Condition Amnesty

Remove Newspaper Advertising Requirement

Outdoor Trading and Pavement Licenses

Increase TENs Entitlement

Sunset Clause on Blanket Hours

Arbitration, Evidence and Data Protocol

Festivals and Event Licensing

Agent of Change Principle

None

Don't know

Prefer not to say

Why do you think this? (text box)

The proposed 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. 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.[1] Alcohol is a leading risk factor for death among those aged 15-49 in England.[2]

It isn't true that alcohol-related harms are only experienced by people with alcohol dependence,[3] 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.[4]

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.[5] The economic costs are likely to be higher than this. As the Cabinet Office has pointed out,[6] 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.[7] Alcohol is thought to be a factor in up to 40% of emergency department attendances, rising to as high as 70% in peak hours.[8]

The 2003 Licensing Act has resulted in steady growth in the number of licensed premises in the UK, including in 24-hour premises.[9] 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.[10]

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.

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 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.[11]

These proposals will further increase off-trade availability, and make it more difficult for local communities and decisionmakers to place guardrails on the sale of alcohol in their local areas.

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

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

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

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

[5] 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.

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

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

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

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

[10] 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.

[11] 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>

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