

ACS Submission: Reforming the Licensing System Call for Evidence

1. About you Are you responding as:

A private sector organisation

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

ACS (the Association of Convenience Stores)

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

Trade body or association

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

Small Business/ Organisation - 10-49 employees

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

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

Yes, as a consultee/objector

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.

ACS supports the principle of establishing a National Licensing Policy Framework (NLPF) to bring greater clarity, proportionality and consistency in licensing decisions. A more uniform approach could reduce the current variation in how policy and enforcement are applied across local areas, which can create uncertainty for retailers and add unnecessary administrative burden. While different in structure, a national framework that functions in a similar way to the Primary Authority model could help ensure retailers and local authorities share a common understanding of expectations and good practice.

However, feedback from our members indicates that it is currently unclear how the NLPF would deliver this clarity in practice. The Licensing Act 2003 and Section 182 Guidance already provide a basis for consistent decision-making. Introducing an additional framework risks adding complexity rather than reducing it, particularly if local authorities interpret the framework differently or apply it to wider, less clearly defined objectives such as cultural development or broader community wellbeing. These concepts are important but are disconnected to licensing decisions in the implementation of the Act as it stands, and may introduce greater scope for subjective interpretation.

Primary Authority partnerships demonstrate that when guidance is practical, operationally grounded, and consistently applied, it can reduce burdens and provide confidence for both regulators and businesses. If the NLPF is designed and implemented in a way that genuinely delivers this same level of clarity while avoiding widening the scope of licensing considerations in ways that increase uncertainty, then it could represent a positive and supportive step forward for both businesses and local authorities.

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.

We fully support the addition of “promoting economic growth” as a statutory licensing objective alongside the existing objectives (prevention of crime and disorder; public safety; prevention of public nuisance; protection of children from harm). Licensing decisions are not just about controls, but also about enabling responsible business investment, innovation and adaptation to changing consumer needs. Superfluous regulatory and compliance costs necessarily inhibit growth.

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.

We want to ensure a level playing field across the licensing regime, particularly if new statutory objectives such as promoting economic growth are introduced. A fair and balanced system should support both the on-trade and off-trade sectors to operate responsibly and contribute to local economies, without one being unfairly advantaged or disproportionately burdened by regulation.

We recognise however that there are specialist issues unique to the on-trade that justify tailored regulatory attention. Premises where alcohol is consumed on-site such as pubs, clubs, and late-night venues can carry a greater risk of crime, disorder, and public nuisance, given the alcohol purchased is being consumed at that time, considering the congregation of large groups and potential for alcohol-related antisocial behaviour in nearby public spaces. It is appropriate that licensing authorities consider these specific risks when determining applications and setting local policy, and that suitable conditions are applied where evidence supports their necessity.

The off-trade sector operates in a very different context. Alcohol sold by retailers such as convenience stores and supermarkets is consumed away from the premises, meaning that the potential for direct disorder or nuisance arising at the point of sale is much lower. The primary regulatory focus for off-trade businesses is therefore on ensuring responsible retailing particularly the prevention of underage sales, training of staff, and compliance with Challenge 25 and other due diligence systems. Off-trade operators are committed to upholding these responsibilities and already invest significantly in age verification, refusal logs, and staff education to maintain high standards of compliance.

The outcome we all want is clarity and consistency in decision-making. A well-designed licensing framework should recognise the distinct characteristics of on-trade and off-trade environments while applying principles that are fair, transparent, and evidence-based.

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

Public Safety and Crime Prevention

Economic Growth and Reducing Business Burdens

Supporting Growth, Highstreets and Night-Time Economies

A key principle of the Licensing Act is that decisions are made on a premises-by-premises basis, reflecting the circumstances of individual businesses. ACS believes this principle should be retained. However, the current system can produce inconsistent outcomes across local areas, particularly in the application of conditions and enforcement approaches.

Greater consistency in the priority themes above would help ensure that responsible businesses are supported rather than penalised. For example, we are aware of cases where retailers who have been the victims of crime have been threatened with licensing reviews, which is neither proportionate nor effective in tackling criminal behaviour. A clearer national policy direction could help prevent such outcomes if implemented as intended.

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.

Other (please tell us below).

We believe the government should take an evidence-based and outcomes-led approach to assessing whether national licensing guidance is working effectively. Evaluation should draw on the experiences of those who apply, enforce, and are affected by the licensing system in practice such as businesses, the police, residents and local authorities.

A meaningful forum by which government could assess whether national guidance is working could be the National Licensing Forum which includes key on-trade and off trade representative experts which could provide direct feedback, evidence, and recommendations on ways to improve guidance.

Other data that could be looked at includes growth in businesses applying for a licence, viability of businesses with an existing licence, the number of businesses appealing decisions, and council held data on average processing times for granting licences.

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

Don't know.

ACS recognises the significant resource pressures currently faced by local authorities and the police, and we would not support an approach that results in unnecessary administrative burdens for businesses or enforcement agencies. An amnesty for licensing conditions may be beneficial if it is designed to streamline processes, reduce the need for retrospective reviews, and prevent businesses from having to reintroduce outdated or disproportionate conditions.

However, further detail is required to understand how the amnesty would operate in practice, including how decisions would be communicated and enforced and whether this would lead to a larger number of reviews of conditions at the point where they are subject to the amnesty, with licensing authorities and others wishing to consider renewing or replacing these with other measures. We would therefore welcome more information to assess whether the proposal delivers practical benefits for both businesses and regulators.

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

Reducing costs to businesses

Reducing non-compliance with conditions

Encouraging better relationships between premises and authorities

Explain Answer.

If properly implemented, the key benefit we see is that an amnesty would help to rebuild direct engagement and collaboration between businesses and licensing authorities. Currently, many local authorities and licensing teams are under-resourced, and officers are often generalists rather than licensing specialists. This can make it difficult for them to dedicate the time and expertise needed to review older licences or maintain consistent engagement with local operators.

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

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

Increased risk to public safety

Increased risk of noise

Increased risk of crime and disorder

Challenges to protect children from harm

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.

A minor variation is defined as one that could not impact adversely on any of the four licensing objectives which does not require significant assessment or consultation by the local authority.¹

Characteristics of a minor variation might include changes to opening hours within a limited range (e.g., extending by one hour on weekdays), small alterations to premises layout that do not affect capacity or public safety, such as moving tables, adding shelves, or minor renovations, or updating contact details or business names on the licence.

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

ACS does not foresee any meaningful risks from removing the requirement to advertise alcohol licensing notices in local print newspapers. In contrast, we believe there would be significant benefits for businesses, licensing authorities, and local communities.

The requirement to publish notices in printed newspapers is outdated and disproportionately costly, especially for small businesses such as convenience stores. Public engagement with print newspapers has declined significantly, particularly at local level.

Removing the print notice requirement would reduce administrative delays, simplify application procedures, and minimise the likelihood of rejected applications due to formatting or publication errors. Most importantly, this would enhance transparency for the general public who are far more likely to access information of this nature by searching online than by scanning local newspapers.

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

Feedback from members suggest the range per site at the lowest to be £200 and at the highest £850 however we are unable to offer a specific number because it can vary significantly between different areas businesses are located in and the number of newspapers outlets available.

We note that the licensing policy sprint joint industry and HM government taskforce report indicates that “based on a list of 250 invoice charges, the average cost to place an advert was found to be £332 – around 115 local newspapers are charging above the average.”²

ACS' Local Shop Report 2025 states that 94% of convenience stores have an alcohol licence meaning they will have already gone through the process of publishing a notice in their local newspaper.³ There were a net 100 new convenience stores opening in the UK this year, and we estimate that 1% (c500) of existing stores would have closed, so a total of 600 stores may have opened in the past year, so assume 564 new stores applying for a licence, so a total cost based on the modelling in the taskforce of £187,248 for those 564 new stores. To this we could add costs for licences under review or applying for variations.

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

No.

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?

¹ [Home Office Guidance on Minor Variations](#)

² [Licensing policy sprint: joint industry and HM government taskforce report](#)

³ [ACS Local Shop Report 2025](#).

The most relevant and visible way for the local community to be informed of a licensing application is through a public notice displayed at the premises itself. This ensures that those that are directly affected such as local residents, neighbouring businesses, and community groups are aware of the application. Physical notices are already required under the Licensing Act and would continue under this proposal, maintaining transparency.

Communities also now obtain local news and information primarily via digital platforms, council websites, neighbourhood social media forums, and online noticeboards.

34. Do you agree or disagree that blanket policies should be subject to regular review or sunset clauses? Agree Disagree Don't know Prefer not to say If there were regular reviews, what timeframe would be appropriate?

Don't know.

Feedback from retailers and licensing professionals indicates that local authority licensing policies are already reviewed every five years, and Cumulative Impact Assessments every three years. This approach is considered effective under the current system, as it avoids placing additional strain on local authorities who are already overstretched and under-resourced. However, we would suggest that this proposal to review blanket policies should be aligned with these existing review cycles to ensure consistency without increasing the administrative burden. For example, if there is a licensing policy review there should be an opportunity to increase core trading hours are reviewed/changed as a minor variation.

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?

The appropriate data sources will depend on the specific type of blanket policy being considered e.g. policies restricting certain product strengths, limiting licensing hours, or controlling product ranges). Any assessment must be evidence-based and demonstrate a clear link between the policy and its intended outcomes. Some options which could be considered include the following:

- Licensing breach data
- Police records
- Number of business complaints
- Number of stores opening/closing in area
- HMRC intelligence on illicit sales of alcohol and other products

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?

Retail members have indicated the following policies being in place in various authorities across the country.

“Core Hours Policies: There can be a contradiction between Home Office guidance and how core hours are applied locally. In some cases, stores are permitted to open earlier or later, but are restricted from selling alcohol during those times. This creates operational difficulties: we are open and staffed, but unable to meet customer demand. Many people work different hours according to shift patterns, so restricting alcohol can place pressure on colleagues, who often have to manage customer frustration when sales are refused despite the store being open.”

“Blanket Alcohol by Volume (ABV) Restrictions: some local authorities apply blanket policies that prevent the sale of alcohol above a certain strength, such as a 5.5% ABV limit. These policies are not always evidence-based and do not take into account responsible retail practices.”

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.

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?

No.

While the existing provisions in paragraphs 9.4 to 9.10 of the Section 182 guidance are intended to prevent irrelevant, vexatious or frivolous representations, in practice they do not always achieve this outcome. The issue is less about the formal validity of objections and more about *how evidence is weighed* during decision-making.

We regularly hear from members about cases where a single objection from an individual resident is given disproportionate weight compared to representations from responsible authorities such as the police or licensing officers, who are better placed to assess risk and enforcement priorities. This can lead to decisions that do not reflect the balance of evidence, place unnecessary burdens on responsible businesses, and divert attention away from the most significant risks.

Greater clarity and emphasis in the guidance on the weighting and evidential value of representations would help to ensure that licensing decisions remain proportionate, evidence-based and aligned with the licensing 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

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

Yes

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.

Disagree.

42. How should informal mediation and resolution be encouraged at the start of the process of making representations?

There should be an ability to speak with a licensing officer and share evidence on an informal basis for feedback.

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

Yes

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?

Licensing Condition Amnesty

Sunset Clause on Blanket Hours

It is essential that any changes are accompanied by additional funding and support for licensing authorities. Without this, there is a risk that the burden of implementation could delay decision-making, reduce enforcement effectiveness, and undermine the intended benefits of the reforms.

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

Positive.

If the reforms lead to reduced administrative burden and cost savings for businesses, these resources can be redirected toward frontline crime prevention measures. Retail crime continues to be a significant and growing concern for our members, not just because of financial losses, but due to the serious risks it poses to colleague safety, customer reassurance, and the overall ability to operate stores safely and effectively.

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

None.

The proposals offer the opportunity, through review and engagement, to facilitate better industry and local authority relationships.

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

None.

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

None.

It is difficult to connect licensing policy decisions to public health outcomes

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

Don't know