

REFORMING THE LICENSING SYSTEM

This consultation response was submitted on 5 November 2025.

Introduction

This consultation seeks views and evidence to develop a modern, proportionate and enabling licensing system under the Licensing Act 2003. This call for evidence builds on the Licensing Taskforce recommendations and the government's response and supports the government's commitment to reduce regulatory burdens by 25% by the end of this parliament. This call for evidence focuses on the on-trade in relation to alcohol sales, for example, pubs, restaurants and nightclubs, and on all entertainment licensed under the Licensing Act 2003.

Key messages

- The government should establish, once and for all, parish and town councils as full and legitimate statutory consultees in all aspects of the processes outlined in the Licensing Act, including all stages of the appeals process.
- The government should add a health and wellbeing licensing objective to Section 4 of the Licensing Act 2003, which would enable licensing authorities, when determining licensing applications, to consider health and wellbeing issues as well as the existing four licensing objectives, as the current regime does not give sufficient weight to the potential health and wellbeing-related impacts of alcohol consumption.

Consultation questions

Question 1: About you. Are you responding as: A public sector organisation.

Question 2: What is the name of the organisation/business that you are responding on behalf of? National Association of Local Councils.

Question 3: Which of the following best describes the organisation/business you are responding on behalf of? Community or charitable organisation.

Question 4: How many employees do you or the organisation that you are responding on behalf of have? Small Business/Organisation - 10-49 employees.

Question 5: Do you or the organisation/business that you work for hold an alcohol licence issued for premises located in either England or Wales under the Licensing Act 2003? No.

Question 6: Have you engaged with the alcohol licensing process previously? No.

Question 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. However, the government should add a health and wellbeing licensing objective to Section 4 of the Licensing Act 2003, which would enable licensing authorities, when determining licensing applications, to consider health and wellbeing issues as well as the existing four licensing objectives, as the current regime does not give sufficient weight to the potential health and wellbeing-related impacts of alcohol consumption.

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

Question 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.

Question 10: What priority themes should be included in a National Licensing Policy Framework? The government should add a 'health and wellbeing' licensing objective to Section 4 of the Licensing Act 2003, which would enable licensing authorities, when determining licensing applications, to consider health and wellbeing issues as well as the existing four licensing objectives. For instance, South Oxfordshire District Council regulates street trading, including food vending, which gives rise to junk food and food hygiene issues. The harms of alcohol are well known, yet government policy seeks to help licensees to sell more for longer – a better balance must be struck. Currently, licensing applications can only be judged on four licensing objectives (as per the Licensing Act 2003 Section 4), i.e. the prevention of crime and disorder, public safety, the prevention of public nuisance and the protection of children from harm. Principal authorities, such as licensing authorities, have the responsibility to grant licences for the sale of alcohol, and parish and town councils have a direct interest in being consulted as part of this process. Some of the County Durham parish and town councils, especially those in larger towns, are consulted on numerous licensing applications each year. Most principal authorities will have a licensing policy in which they explain how they will judge the licensing objectives. When granting licenses to sell alcohol, there is currently no duty to consider the health/well-being impacts of alcohol consumption. There are areas/situations where there is evidence that alcohol misuse is having a significant impact on public health and wellbeing. For example, in some areas, alcohol use is a causative factor in reducing life expectancy.

Question 11: How could the government assess whether national guidance is working effectively? Fewer people appeal decisions. The government should establish, once and for all, parish and town councils as full, legitimate and statutory consultees in all aspects of the processes outlined in the Licensing Act, including at all stages of the appeals process.

Question 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? Council websites, newsletters or social media channels. The addition of a health and wellbeing licensing objective is seen as a potential addition to a larger toolkit. It would

not per se resolve issues of alcohol misuse and health/wellbeing-related harm, but could be an important element of a wider set of legislation, policies and practices to try and tackle alcohol misuse and its negative impacts on communities. A stronger voice could be heard with the ability to use health data more effectively in determining applications for licensing applications.

Question 49: Are there recognised examples of effective practice in the UK that could contribute to the development of policy and guidance for local authorities?

Yes. The Local Government Association cites Health and Wellbeing Boards (HWBs) as a statutory forum where political, clinical, professional and community leaders from across the care and health system come together to improve the health and wellbeing of their local population and reduce health inequalities. They have been in place since 2013 and are a single point of continuity in a constantly shifting health and care landscape. It is now a time of significant and complex change with NHS reforms introducing Integrated Care Systems. HWBs need to evolve and adapt to operate within this new context. The Local Government Association has lobbied the government on health as a licensing objective several times over the last ten years. It undertook and published the results of a survey of Directors of Public Health and the Licensing Process in January 2016, which indicated a significant majority supporting a public health objective in the Licensing Act 2003 to assist them in delivering their role. Although this study is nine years old and the legislation is from 22 years ago, the legislation is, in any case, considered likely to be in need of a review, considering changing habits and behaviours.

Question 57: In your view, what impact will the proposals for reform included in this call for evidence have on public health?

The impact of the proposals will be minimal unless the government adds a health and wellbeing licensing objective to Section 4 of the Licensing Act 2003, which would enable licensing authorities, when determining licensing applications, to consider health and wellbeing issues as well as the existing four licensing objectives. Public health teams are tasked with trying to address alcohol related health harms within communities, i.e. fix problems created by alcohol misuse, whilst there is no ability to influence the granting of licenses, which lay the foundations of how easily alcohol is available.

Question 58: Which, if any, of the reforms described in this call for evidence, in your view, pose public health concerns?

Remove the newspaper advertising requirement.