

City of London Corporation Committee Report

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| Committee(s): Licensing | Dated: 05/02/2026 |
| Subject: Licensing Reforms | Public report: For Information |
| This paper: <ul style="list-style-type: none">provides an overview of recent government licensing reforms including the National Licensing Policy Framework and the Mayor of London's Strategic Licensing Pilot | |
| Does this proposal require extra revenue and/or capital spending? | No |
| If so, how much? | n/a |
| What is the source of Funding? | n/a |
| Has this Funding Source been agreed with the Chamberlain's Department? | n/a |
| Report of: | Katie Stewart, Executive Director of Environment |
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Summary

This report provides an overview of recent government licensing reforms including

- (a) The National Licensing Policy Framework (NLPF), its purpose, scope, and implications for The City of London Corporation in its capacity as a licensing authority. It sets out the strategic objectives, key principles, and implementation requirements, and outlines next steps for integrating the NLPF into the City Corporation's Statement of Licensing Policy (SoLP) and local licensing practices.
- (b) An update on The Mayor of London's Strategic Licensing Pilot.
- (c) An overview of the proposal to introduce a Greater London Strategic Licensing Policy.

Recommendation(s)

Members are asked to:

- Note the report

Main Report

Background

1. In April 2025, as the Licensing Act 2003 (The Act) reached its 20th anniversary, a joint industry and government licensing policy sprint taskforce was established to review key aspects of The Act, investigate areas of concern, and to make recommendations in changing the licensing system to deliver economic growth in the hospitality sector and night-time economy, whilst upholding the four licensing objectives.
2. The taskforce concluded in May 2025, and provided government with 10 priority recommendations to consider:
 - 2.1. The introduction of a National Licensing Policy Framework***
 - 2.2. A one-time (twentieth anniversary) licensing condition 'amnesty'
 - 2.3. Improvements to hearings and appeals
 - 2.4. Removing the hard-copy local newspaper advertising requirement
 - 2.5. Improve the potential for licensed premises to better use their outside spaces
 - 2.6. Increase the maximum entitlement for Temporary Event Notices (TENs) for licensed premises
 - 2.7. A 'sunset clause' on blanket hours policies where they exist
 - 2.8. An arbitration, evidence and data protocol for licensing decisions
 - 2.9. A review of licensing provisions around festivals and events
 - 2.10. The agent of change principle to be a factor that must be considered when making licensing decisions
3. The taskforce report made several other recommendations including a review of Licensing Act fees which have remained unchanged since 2005, a review of the evidential requirements for imposing a Late-Night Levy, a review and rewrite of the statutory S182 Guidance to the Act, **a London Licensing Pilot giving the Mayor of London 'call-in' powers on licensing authority decisions in areas of strategic importance, to be introduced as a 2-year pilot scheme, and the introduction of a Strategic Licensing Policy for London***.
4. Government welcomed the taskforce recommendations, accepting the majority of them subject to further work and engagement and/or consultation, and acknowledging that some of them would require legislative changes to be implemented, therefore delivery of these latter reforms could only take place when/if Parliamentary time allows.
5. Through a Call for Evidence in October 2025, Government invited views and evidence to build on the taskforce recommendations and the development of a modern, proportionate and enabling licensing system.
6. Following analysis of responses, the NLPF (Recommendation 1) was launched as part of the Government's Autumn Budget on 26 November 2025. The other 9 priority recommendations and subsidiary recommendations were either agreed in principle or partially agreed subject to further stakeholder consultation or required

further review/legislative changes. Progress on implementation of these recommendations will be reported to this committee accordingly. * **this report therefore only covers those recommendations in bold text above which have been progressed to the next stage by Government.**

National Licensing Policy Framework (NLPF)

7. The NLPF seeks to modernise the licensing system and ensure consistency in the application of The Act across England and Wales. It responds to challenges in balancing the four licensing objectives with wider economic and social priorities, such as supporting the night-time economy and promoting public safety. The framework aims to provide a clear national direction while allowing local discretion and flexibility.
8. It is non-statutory guidance designed to support consistent, lawful and proportionate licensing. Licensing authorities must have regard to the Secretary of State's Guidance under section 182 of the Licensing Act 2003 and to their Statements of Licensing Policy and the NLPF does not displace those duties or restrict authorities' discretion to determine each application on its merit. However, it does create new legal obligations for Licensing Authorities as they are expected to take the NLPF into account as guidance and have regard to it when reviewing their SoLP and determining applications.

Scope of the NLPF

9. **Licensing Authorities** - The NLPF applies to all licensing authorities operating under The Act. It covers the determination of applications for premises licences, club premises certificates, and temporary event notices, as well as reviews and variations. It also influences how authorities develop and review their Statements of Licensing Policy.
10. **Businesses** – The NLPF applies exclusively to on-trade premises licensed under The Act i.e. to those premises licensed for on-sales of alcohol, regulated entertainment, or late-night refreshment. This includes, but is not restricted to pubs, bars, restaurants, cafés, hotels, theatres, cinemas, concert halls, festivals, events and licensed outdoor areas such as beer gardens and licensed pavement areas. It excludes off-trade premises such as off-licences and supermarkets.

Strategic Objectives of the NLPF

11. The NLPF provides a strategic direction for a modern licensing system that:

- 11.1. Maintains and reaffirms the importance of the four statutory licensing objectives:
 - Prevention of crime and disorder
 - Public safety

- Prevention of public nuisance
- Protection of children from harm

11.2. Is enabling as well as protective, supporting economic growth, high street regeneration and cultural vitality, particularly in the night-time economy.

11.3. Promotes proportionate, evidence-led decision-making, with only necessary conditions imposed on licences, supporting the evolving needs of businesses and communities.

11.4. Encourages collaboration between licensing, planning, and public health, working in harmony to unlock investment in the nighttime economy by creating safe and vibrant places for communities to socialise in.

Key Principles of the NLPF for Licensing Authorities

12. Licensing Authorities are expected to:

- 12.1. Use the NLPF to guide the revision of their Statement of Licensing Policy (SoLP)
- 12.2. Align their SoLP with wider government ambitions around economic growth, public health, cultural vitality and the evolving role of hospitality venues, as well as working with planning policy to avoid conflict
- 12.3. Applying the Agent of Change Principle, ensuring new developments near existing licensed premises take responsibility for mitigating impacts such as noise, rather than placing undue burdens on established venues
- 12.4. Avoid imposing framework hours and blanket conditions on licences, ensuring decisions are necessary, proportionate and based on evidence.
- 12.5. Adopt risk-based regulation, using data such as crime reports and complaints, to identify patterns, prioritise interventions, and support proportionate responses, specific to the risks identified.
- 12.6. A graduated enforcement approach where issues arise, starting with informal engagement and support, and escalating only where necessary. Enforcement should be proportionate, transparent, and focused on resolving problems rather than penalising businesses unnecessarily.
- 12.7. Consider longer duration permissions where possible

Partnership Working

13. The NLPF encourages partnership working as follows:

- 13.1. Licensing authorities should collaborate closely with responsible authorities, including the police, fire service, and public health teams, to ensure joined-up decision-making.

- 13.2. Engagement with local businesses, residents, and community groups is essential to balance economic growth with public safety and nuisance prevention.
- 13.3. Authorities should work in partnership with planning teams to align licensing decisions with regeneration and place-making strategies.
- 13.4. Joint initiatives with transport providers and night-time economy stakeholders can improve safety and accessibility.
- 13.5. Alignment of local licensing priorities with wider government or mayoral strategic objectives, where they exist.

Next steps/impacts for City Corporation in implementing the NLPF

14. **Statement of Licensing Policy** – the City Corporation's SoLP is due to be re-published in January 2027 and the statutory review of it will commence in February 2026, with a proposal report to include a stakeholder consultation, to be brought back to this committee in May 2026. The current policy is largely consistent with the NLPF as it does not have framework hours, cumulative impact zones, and only appropriate conditions are imposed on licences. However, the review will fully scope in all the visions and aims of NLPF and align with the City's Corporate Plan, planning/place-shaping & cultural strategies.
15. **Risk Based Regulation** – the City Corporation has been operating a risk (traffic light) scheme since 2013, whereby incidents relating to licensed premises carry a score which is recorded and used to identify patterns or where problems may escalate. The Licensing team, City Police or other responsible authority are then able to intervene at the earliest opportunity, meeting with licensees to discuss ways in which problems can be mitigated or avoided, to prevent formal enforcement action. Visits and inspections are usually carried out as a result of incidents, a complaint or they are intelligence led. The traffic light scheme will be reviewed alongside the SoLP to ensure it fully aligns with the NLPF.
16. **Partnership Working** – in addition to the traffic light scheme, the City Corporation has well-established partnership groups and other initiatives which align with the NLPF and support its aims and visions. These include but are not limited to:
 - 16.1. Weekly Night-Time Economy partners meeting which brings together the licensing authority, Police, Environmental Health, Health and Safety, Cleansing, and Fire Authority to jointly problem solve. These used to be held monthly but have been moved to a weekly cycle to enable a more dynamic, responsive approach, enabling partners to coordinate swiftly and tackle issues as they arise.
 - 16.2. Free pre-application licensing advice to applicants giving them an opportunity to discuss any issues with the relevant responsible authorities in advance of their application.
 - 16.3. An informal mediation service between applicants, responsible authorities and interested parties, to find solutions and resolve concerns without the need for costly hearings.

- 16.4. A good practice accreditation scheme 'Safety Thirst', which ensures premises meet standards laid down in the Corporation's Code of Good Practice for Licensed Premises and recognises the effort and dedication licensees put into promoting good practice at their venues, to ensure the City's night-time economy enjoys a reputation for safe, innovative, and vibrant hospitality.
- 16.5. Operation Reframe which is the City Police led partnership approach to facilitate the night time economy by providing a high visibility presence, involving targeted engagement with licensed premises around security, safety and management of patrons.

The City Corporation will keep these initiatives under review and build on them to keep them aligned with the NLPF.

17. A copy of the NLPF can be found at Appendix 1.

The Mayor of London's Strategic Licensing Pilot

18. The Mayor of London's Strategic Licensing Pilot (The Pilot) was announced by Government in April 2025. When the Pilot is implemented (subject to legislative changes), it will give The Mayor 'call in' powers over local licensing decisions in strategic areas in London, potentially overriding licensing authority decisions where such Mayoral intervention is permitted, in respect of new grants and variations, opening hours or the imposition of restrictive conditions.
19. The Pilot will be a two-year scheme to trial Mayoral call-in powers and shape criteria for strategic applications.
20. The aim is to streamline approvals for hospitality, cultural, and nightlife venues to boost London's economy and night-time offer, by reducing red tape and enabling more consistent strategic growth for venues like pubs, clubs, and alfresco dining spaces, aligning London with other global cities like New York.
21. The GLA is currently developing plans with the Government, London Councils, Police, businesses and industry representatives. The plans (subject to Secretary of State regulations) will define the scope of The Mayor's new powers and set out the criteria for what constitutes a strategic area or strategic application and set out procedural requirements for calling in decisions. The GLA's London Nightlife taskforce has indicated that their plans will be published towards the end of January 2026, and at the time of writing this report, the plans are still awaited.
22. The model will likely draw on precedents from planning legislation where The Mayor already has call in Powers under the Town and Country Planning Act and London Plan policies.
23. At present, there is no information on whether any areas, venues, or applications within the City of London Corporation jurisdiction, will be defined as strategic for the purposes of The Pilot. Where such areas/venues/applications are defined, the Mayor of London will become a Responsible Authority under the provisions of the Licensing Act 2003 but only in respect of those areas/applications.

24. The Pilot proposal requires legislative changes, and these will be achieved through the English Devolution and Community Empowerment Bill, which is currently at the Committee stage in the House of Lords. Once enacted, the Secretary of State can determine by way of Regulations what will be subject to that pilot and the terms under which The Pilot will be exercised.

Mayor of London Strategic Licensing Policy

25. This is separate to the above pilot scheme as part of the proposed reforms, The Mayor will publish a London Strategic Licensing Policy that licensing authorities in London must have regard to when developing their policies and making decisions, with the purpose of creating more consistency across the authorities.

26. Once the London Strategic Licensing Policy is published, The Mayor of London will become a statutory consultee on London licensing authority SoLP's and those authorities must align their SoLP with the Mayor's strategic direction.

27. The strategic policy proposal requires legislative change, and this will also be achieved through the English Devolution and Community Empowerment Bill, but once that bill is passed (unlike the pilot) will not require further legislation to be brought into effect (save for any necessary commencement provisions).

Next Steps relating to The Pilot and the Strategic Policy

28. The City Corporation's licensing team has and will continue to contribute to the development of The Pilot scheme for London, by participating in consultations and engagement sessions with the GLA and will update this Committee on their progress accordingly.

29. There are no defined timelines for implementation of The Pilot or the Strategic Policy which are both subject to legislative changes, but the GLA has indicated that it will be conducting a formal consultation on its proposed plans in early 2026.

Corporate & Strategic Implications

30. **Vibrant Thriving Destination:** The proposals in this report will help to meet the aims contained within the Corporate Plan 2024-29 by attracting businesses and people to a safe, secure, and dynamic location.

31. **Flourishing Public Spaces:** Promoting vibrant, safe and accessible environments, ensuring licensing in public spaces support cultural activities and community engagement, fostering well-managed, inclusive spaces that balance commercial activity with public safety, prevention of crime, disorder and anti-social behaviour, creating destinations where people can socialise, work, and enjoy cultural experiences in harmony.

32. Providing Excellent Services: Proportionate, evidence led decision making and integration with wider planning, cultural and regeneration strategies, delivering a licensing service that is transparent, responsive, and of high standards for applicants, residents, workers and other stakeholders.

33. Dynamic Economic Growth: A safe, well regulated nighttime economy is attractive to visitors, encourages footfall and supports economic growth in the hospitality sector.

Financial implications

34. The review of SoLP and other interlinked schemes such as the Traffic Light Scheme and the Safety Thirst accreditation scheme in light of the NLPF requires officer time, external consultation and potentially expert legal advice. Whilst this review will form part of the wider statutory review of SoLP, additional resource will be required to scope in the NLPF, and this will need to be absorbed within existing budgets.

35. The Licensing Service will need to adapt processes to accommodate The Mayor's call-in powers and have regard to the forthcoming Strategic Licensing Framework. This may involve procedural changes and officer training but no direct financial outlay beyond internal resource adjustments.

Resource implications

36. Additional officer time will be required to reflect the requirements of the NLPF in the SoLP, and Licensing Sub-Committee decision reports going forward. Licensing staff will need to be trained on the NLPF requirements and how to apply them in evidence-led decision making on delegated decisions, particularly in imposing proportionate and necessary conditions.

37. Additional officer time will be required to adjust workflows to accommodate the forthcoming Strategic Licensing Framework,

Legal implications

38. The NLPF is non-statutory guidance, but The City Corporation is expected to have regard to it when making licensing decisions and reviewing its Statement of Licensing Policy. However, the Licensing Act 2003 and Section 182 Guidance remain the primary legal instruments, and any conflict must defer to these statutory provisions.

39. Departures from statutory guidance or failure to demonstrate regard for the NLPF could expose the Licensing Authority to appeals or judicial review, requiring clear reasoning and documentation.

40. Once the Mayor's Strategic Licensing Policy is published The City Corporation will be expected to have regard to it as per the NLPF as set out in paragraphs 38 & 39.

41. The introduction of Mayoral “call-in” powers would represent a shift in decision-making authority in such cases as the decisions would not be taken by “The City”.

42. While the Greater London Authority (GLA) may assume responsibility for decisions in strategic cases, uncertainty remains over who bears liability in appeals or judicial reviews, but it would be expected to rest with the actual decision maker.

43. **Risk implications:** none identified

44. **Equalities implications** – none identified

45. **Climate implications:** none identified

46. **Security implications:** none identified

Conclusion

47. The SoLP and interlinked schemes and initiatives must be updated to reflect the non-statutory NLPF principles while maintaining compliance with the Licensing Act 2003 and its statutory guidance.

48. If the London Strategic Licensing Policy is published before the review of the City of London SoLP is completed, the City Corporation will need to have regard to the Strategic policy during its review.

49. Implementation will involve officer time for policy review, training, and enhanced stakeholder engagement, with no additional staffing provision.

50. Costs are primarily resource-based, with no new statutory fees or levies

Appendices

- Appendix 1 – National Licensing Policy Framework

Background Papers

[Licensing policy sprint: joint industry and HM government taskforce report - GOV.UK](#)

[Licensing taskforce report: government response - GOV.UK](#)

[Licensing Reforms Programme - Call for Evidence](#)

[Licensing Reform Programme: call for evidence analysis](#)

[National Licensing Policy Framework for the hospitality and leisure sectors \(web version\) - GOV.UK](#)

[English Devolution and Community Empowerment Bill \(16th October 2025\)](#)

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