

**Consultation on the Relaxation of licensing hours during the FIFA World Cup, 2014
Response by the Association of Convenience Stores**

ACS (the Association of Convenience Stores) welcomes the opportunity to respond to this consultation. ACS represents 33,500 local shops across all UK regions, the majority of which hold alcohol licenses.

Licensing hours orders can play a key role in recognising significant celebrations and in reducing the administrative and financial burdens of the likely increase in TENs applications that would otherwise result. However, any action taken must ensure that it does not distort the market, limit competition or impinge upon the licensing conditions.

ACS supports the use of a licensing hours order for England's World Cup games, but as set out below, do not think that this should be exclusively for the on-trade given the likely increase in demand for later off-trade sales for late starting games.

Question 1: Which of the following statements best reflects your view on the relaxation of licensing hours for specific periods during the World Cup in 2014?

ACS supports the use of national orders at times of particular significance, and therefore supports a national relaxation of licensing hours for all England matches during the World Cup. However, we recognise people will want a choice between watching England games at home or in a pub, and therefore do not believe this relaxation should be limited to the on-trade.

ACS is calling for an extension for off-trade licensing, especially for England's opening game due to start at 11pm, as this start time falls outside of many convenience store opening hours, and would therefore deny shoppers the opportunity to obtain alcohol from stores on their way home to watch the match. Without this extension it could give large multiples who operate 24/7 a competitive advantage during this period.

We continue to support the use of the local temporary event notice system to allow local determination of all licensing decision-making not related to a significant 'celebration period', or for extensions beyond the limits set out in this response.

Question 2: Do you agree or disagree that a national relaxation of licensing hours would contravene one or more of the licensing objectives ((1) crime prevention / (2) public safety / (3) public nuisance / (4) prevention of harm to children)? Please tick the relevant boxes from the options below:

We do not believe this temporary extension would contravene the licensing objectives, as it is for a limited period for a select number of dates only, and would arguably prevent possible disturbances by removing the risk of having to turn people away during England matches.

Question 3: If licensing hours were to be relaxed nationally during England's World Cup matches, do you think that this should be for: three, three and a half or four hours after the scheduled kick off time:

As ACS does not operate or represent on-trade premises we are not in a position to recommend an extension period.

However, as set out above, we do believe there should be an extension period for off-trade retailers, especially for the England's late starting opening match, and any subsequent England games which may involve late kick-off, to 11pm, in order to avoid a commercial disadvantage for small stores, and to avoid any potential disturbances or public nuisance relating to turning away customers in advance of the matches.

Question 4: The Licensing Act 2003 applies to both England and Wales. However, a national relaxation of licensing hours could apply to the entire region or to specified areas within it. With this in mind, if licensing hours were to be relaxed nationally during England's matches in the World Cup, do you think that this should be for England and Wales or for England only?

Any changes should apply to both England and Wales to ensure consistency of communication to the public, for businesses, and to prevent any dissatisfaction or disturbance for Welsh premises, especially those near the border.