

1) Please describe how and why you use these statistics. Please be as specific as possible; for example, if you use the statistics to provide briefing and further analysis to others, it would be helpful to know what the end use is.

The Association of Convenience Stores (ACS) welcomes the opportunity to respond to the Home Office's consultation on their alcohol and late night refreshment licensing statistics for England and Wales. ACS is a trade association, representing over 33,500 stores across the UK, including Spar UK, Nisa Retail, Costcutter and thousands of independent retailers. Alcohol is an important sales category for convenience retailers, on average representing 14.9% of sales in the convenience sector. While 81% of convenience stores hold alcohol licences (ACS Local Shop Report 2018).

These statistics are essential to understand trends in number as well as types of alcohol licences (on-trade and off-trade). Despite a shift in consumers purchasing alcohol in the off-trade, the growth in new alcohol licences is driven by on-trade premises. The Home Office statistics can also help identify what impact new legislation, policy and guidance is having on performance in the market. Since the introduction of the Licensing Act in 2005, we have seen numerous amendments to legislation and guidance that has a direct impact on businesses operating in the market. Cumulative Impact Assessments and Late Night Levies can act as a barrier to entry for some businesses and affect their investment decisions. These impacts can be measured through the alcohol licensing data

As well as using the statistics to understand the context of the number and type of alcohol licences in England and Wales, ACS uses the statistics to inform briefings to Government Ministers and MPs, responses to Government consultations, and written evidence to Parliamentary Committees. We continue to call on government to make more effective use of existing sanctions for the sale of illicit alcohol, including the revocation of alcohol licences for selling illicit alcohol. Table 9 of the statistics helps us understand how many reviews carried out relate to the sale of illicit alcohol, but it would also be useful to understand what action was taken following a review relating to the sale of illicit alcohol. This will help inform our recommendation to whether licensing authorities not only need to carry out reviews of alcohol licences where the premises is selling illicit alcohol but ensuring that they take appropriate action, including the revocation of the licence.

2) Which parts of the publication have you used? (Please tick all that apply)

- Commentary
- Data tables

3) Which data tables have you used, if any?

- Table 1 – To understand the trend in the number of off-trade premises. We would welcome further breakdowns of the different types of businesses holding premises licences in the on-trade and the off-trade. This could capture new market entrants such as licensed cafés.
- Table 4 – To understand the trend in 24-hour licences and which types of premises are applying for 24-hour licences. We would welcome definitions for 'supermarkets and stores', 'large supermarkets', 'other convenience stores' and 'supermarket and store type not reported'.

- Table 9 – We welcome that the Home Office Alcohol and Late Night Refreshment Licensing England and Wales Statistics has begun to collect data on the number of reviews which relate to the sale of illicit alcohol. We would like to see the statistics provide a breakdown on what action was taken following completed reviews by reason for completed review as it would be useful to understand what action was taken following a review of an alcohol licence where the premises was selling illicit alcohol.

4) Do you have any concerns on the quality of the data submitted by the licensing authorities (LA)?

N/A

5) Do you use the imputed estimates reported in the headline figures, data for individual LAs or both?

Headline figures

6) If you use the imputed estimates, do you think the methodology used is suitable?

N/A

7) Is your response your views as an individual user or on behalf of an organisation?

- Organisation (please specify)

Association of Convenience Stores

8) What sector do you work in? (Please select 1 answer only)

- Commercial or private sector

9) May we contact you to discuss your response to this consultation? This may be to follow up on any specific points we need to clarify.

Yes

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