

# **A REVIEW OF THE CAMDEN LATE NIGHT LEVY**

**A report by  
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Associates**

**For the London Borough of Camden  
September 2025**

# Contents

<b>1. EXECUTIVE SUMMARY</b>	<b>2</b>
1.1 Introduction	2
1.2 Methodology	2
1.3 Key findings	3
1.4 Future options	5
<b>2. CONTEXT</b>	<b>6</b>
2.1 What is a Late Night Levy (LNL)	6
2.2 Brief history & structure of the levy	6
2.3 Current structure and operation	7
<b>3. METHODOLOGY</b>	<b>8</b>
3.1 Stakeholder Engagement	8
3.2 Data review	9
<b>4. KEY FINDINGS</b>	<b>10</b>
4.1 Introduction and scope of this review	10
4.2 Management of Camden's Late Night Levy and funds raised	11
4.3 Impact on businesses	12
4.4 Impact on other stakeholders	17
4.5 Impact on policing and crime	17
4.6 How the police use the Levy funding	18
4.7 Metrics that show the Levy's impact against its aims and objectives	22
4.8 Assessing the Levy's equity and fairness	22
<b>5. COMPARATIVE ANALYSIS</b>	<b>24</b>
5.1 Context	24
5.2 Late Night Levy case study: Hackney Nights	24
5.3 Late Night Levy case study: Islington	26
5.4 National Context	28
<b>6. OPTIONS</b>	<b>29</b>
6.1 Introduction	29
6.2 The options	29
<b>7. APPENDICES</b>	
7.1 Appendix 1: Police statistics	32

## 1. EXECUTIVE SUMMARY

### 1.1 INTRODUCTION

The Late Night Levy ('LNL' or 'the Levy'), established under the Police Reform and Social Responsibility Act 2011, empowered local licensing authorities to collect a charge from licensed premises selling alcohol between midnight and 6am. Camden Council adopted the Levy in April 2016 with the intent to support the borough's night time economy by reducing crime and disorder, promoting safety and shifting the burden of night-time management onto the businesses that benefit from trading after midnight.

The Late Night Levy powers were further amended under the Police and Crime Act 2017 (albeit these only came into force in 2023). The key amendments permitted licensing authorities to apply the levy to specific geographical locations rather than borough-wide, and to include late night refreshment outlets (i.e. hot food and hot drink served between 11pm and 5am). A further requirement meant licensing authorities must now publish information about how funds raised by the Levy are spent.

This review of Camden's LNL aims to evaluate whether the Levy is meeting its intended objectives and to identify options for its future, based on available data, stakeholder feedback and comparative learning from other areas.

### 1.2 METHODOLOGY

The review utilised a mixed-methods approach:

**Stakeholder engagement:** 27 interviews and survey responses were collected from a range of stakeholders, including licensed businesses, Business Improvement Districts (BIDs), landowners, residents, trade associations (BBPA, NTIA, UKHospitality), the Metropolitan Police and council officers. In-person interviews were prioritised for Levy-paying businesses to ensure robust representation.

**Data review:** Publicly available financial data, Freedom of Information (FOI) responses and other data were analysed. Isolating LNL-specific outcomes is challenging for a number of reasons explained later, and therefore limits the ability to draw definitive conclusions.

It is important to recognise that isolating the specific impact of a Late Night Levy is inherently challenging. A wide range of external factors including policing strategies, licensing changes, economic conditions, public behaviour and other local schemes can all influence outcomes such as crime, ASB, venue performance and perceptions of safety. Any conclusions about the effect of the LNL should therefore be treated with appropriate caution.

## 1.3 KEY FINDINGS

### 1.3.1. Financial transparency and oversight

If the Levy is retained, stakeholders expressed interest in clearer processes for how LNL funds are collected and utilised. There is a recognised opportunity to build on existing engagement channels to improve communication with stakeholders.

### 1.3.2. Disproportionate impact on some businesses

Some businesses, especially those in quieter areas or with private security arrangements, highlighted a perceived lack of direct benefit. If the Levy is retained, suggestions are made to consider extending the Levy to other late-night operators that may also contribute to late-night disturbances to enhance fairness, such as late night refreshment premises.

### 1.3.3. Policing and crime reduction

The police assert that LNL funding enables additional high-visibility patrols and targeted operations (e.g. against knife crime and mobile phone thefts), resulting in reduced crime during deployment periods. Some stakeholders suggested that, if the Levy is retained, reinforcing the visibility and communication of these activities could increase perceived impact.

### 1.3.4. Limited perceived benefit to other stakeholders

Residents provided useful input on their experience of the impact of the Levy on crime, anti-social behaviour, noise, and public nuisance, enabling researchers to understand how the impacts of the Levy were experienced 'on the ground'. Resident responses were mixed. While some appreciated the need for more visible policing and enforcement, others questioned whether the Levy adequately reflects community needs or contributes meaningfully to safety and cleanliness in their neighbourhoods.

### 1.3.5. Accountability and evaluation mechanisms

There is potential to introduce much clearer impact metrics, regular reporting and communications about what the Levy is achieving, if retained. Increased visibility of funded activities could foster greater stakeholder confidence in the Levy.

In addition, Camden Council could consider building on its existing collaborative approach to the management of the Late Night Levy and decisions around how funds are allocated. For example, extending business representation on the Late Night Levy Consultative Group and introducing direct and regular communications with stakeholders.

### 1.3.6. Inequity across locations

The spend of the Levy has mainly been concentrated in areas like Camden Town, yet stakeholders in Kilburn, Bloomsbury and King's Cross highlighted unmet needs in terms of safety, reassurance and visible police presence. Suggestions were made to apply the Levy

only in high-activity zones with significant post-midnight challenges and ringfence spending accordingly. However, for other stakeholders, they were keen to see it retained borough-wide as there are some premises outside of the main night-time economy areas that both trade after midnight and, allegedly, cause problems in terms of public realm impact, noise and police call outs.

### 1.3.7. Comparative insights

Authorities, such as Hackney, were referenced for their collaborative and strategic approaches and how they use their Levy funding. The **Hackney Nights Scheme** is a multi-component scheme for addressing issues within the late night economy. This includes:

1. The funding of a full time Late Night Levy Manager position to coordinate all of the following:
2. A mini-framework for venues to pre-certify compliance with the licensing objectives,
3. An online portal for sharing intelligence with operators about legislative changes, enforcement issues, health and safety and event-related updates from partners such as the police and council,
4. Public awareness campaigns such as 'Reframe the Night',
5. Night-time medics for the busiest nights in locations such as Shoreditch,
6. An online vulnerability and compliance management training package for venues,
7. An email system for alerting venues to noise reports within 48 hours to avoid delays that can lead to noise problems continuing unbeknownst to venues and enforcement escalation,
8. An online planning application notification system to alert venues about new residential developments in their vicinity, so they can object to any plan that might compromise their venue's viability e.g. noise complaints (supporting 'agent of change'),
9. A pre-application licensing service advice to support small venues applying for licences on how they may comply with the licensing objectives, particularly within Hackney's two cumulative impact areas (increasing the number of successful high quality and compliant applications).

Venues that achieve Hackney Nights accreditation benefit from a 30% reduction in their Late Night Levy fees. The scheme states that it has delivered measurable outcomes: a 40% reduction in nightlife related crime, a 60% reduction in repeat noise complaints, high levels of compliance, and only 2% refusal rate among applications that engaged with the licensing advice service.

If the Levy income in Hackney is used predominantly for the Hackney Nights programme (after administration costs) and that late night policing for Shoreditch and Dalston (31 officers on Friday and Saturday nights) is in part provided by the MPS itself.

Should the Levy be retained, Camden may benefit from exploring some of the elements of this model (and which are not being implemented by or delivered under Camden's new

*Statement of Licensing Policy and Evening & Night-time Strategy) as part of future enhancements.*

### **1.4 FUTURE OPTIONS**

Three primary options were considered:

#### **Option A: Remove the Late Night Levy**

This option reflects the view from some stakeholders that alternative, partnership-based approaches to managing the night-time economy (NTE) may offer more collaborative and effective ways of achieving shared objectives, and that the current approach is not delivering sufficient levels of dedicated police visibility. However, the Late Night Levy funding provides 72 hours' worth of policing each week in addition to that which would be provided by the Met to Camden borough otherwise and this would be lost.

#### **Option B: Retain the Late Night Levy with changes**

This would be welcomed by those Levy paying businesses who support the Levy but only if it is better targeted at their operating environment, e.g. ensuring customer safety once outside the venue. This could involve several or all of the following changes:

- Improved transparency through significantly improved and more frequent communications about LNL spend and impact.
- Expansion of the Late Night Levy Consultative Group to include a wider range of licensed businesses.
- Area-based charging to reflect local needs and demands.
- An expanded contribution base from late night refreshment premises (currently being reviewed by Camden)
- Integration into Camden's broader *Night-Time Economy Strategy*, potentially with a dedicated Night Time Manager.
- Introducing / enhancing take-up of schemes such as those used in the Hackney Nights (funded by its Late Night Levy) to reduce vulnerability and improve late-night venue safety.

#### **Option C: Retain the Late Night Levy as it is now**

Favoured by the police, this would involve retaining the Levy, with the funding apportionment from the Levy continuing to fund dedicated police interventions for the NTE. If chosen, this option would require a significant improvement in transparency and communications with stakeholders, particularly licensees, about how the Levy is being used (e.g. additional weekly police hours, deployment locations) and its impact (e.g. demonstrable reductions in crime and ASB linked to the late-night economy).

## 2. CONTEXT

### 2.1 What is a Late Night Levy (LNL)

A Late Night Levy (LNL) is a discretionary power introduced under the Police Reform and Social Responsibility Act 2011, enabling licensing authorities in England and Wales to raise a financial contribution from premises licensed to sell alcohol between midnight and 6am. The revenue generated through the Levy is intended to support the management of the local night time economy, particularly in relation to crime prevention, public safety and the costs associated with late-night activity.

While the Levy is a national mechanism, its implementation is a local decision, with each authority responsible for determining the operational hours, applicable premises and overall approach. In every case, after the council retains administration costs (albeit it may elect not to do so), at least 70% of the Levy income must be allocated to the local police force, with the remaining funding retained by the council to invest in initiatives that support the aims of the Levy.

### 2.2 Brief history & objectives of the Levy

Since its introduction, the Late Night Levy has been adopted by a very small number of England and Wales - just 10 of almost 300 local licensing authorities, with six of those being in London - each applying it in ways that reflect their specific local context.

National evaluations and reviews have pointed to mixed views about the effectiveness and appropriateness of the Levy. In particular, the 2017 House of Lords Select Committee on the Licensing Act 2003 recommended its abolition in favour of more flexible alternatives. More recently, the Greater London Authority's (GLA) 2023 review of the Levy highlighted significant variation in both how it is implemented and the outcomes it achieves. The GLA's report recommended clearer guidance for authorities and greater transparency in how Levy funds are allocated and spent.

According to guidance issued by the Home Office, the Late Night Levy is a power "to charge a levy to persons who are licensed to sell alcohol late at night in the authority's area, as a means of raising a contribution towards the costs of policing the late night economy". In addition, the licensing authority can retain a proportion "to fund services it provides to tackle late night alcohol related crime and disorder and services connected to the management of the night time economy. Specifically, these activities must have regard to the connection with the supply of alcohol during the late night supply period and related to arrangements for:

- the reduction of crime and disorder
- the promotion of public safety

- the reduction or prevention of public nuisance; or
- the cleaning of any relevant highway or relevant land in the local authority area.”

### 2.3 Current structure and operation

Camden Council adopted the Late Night Levy in 2016, with the scheme coming into effect on 28th April. Since then, all premises in the borough licensed to sell alcohol between midnight and 6am are required to pay the Levy, unless specific exemptions or reductions apply.

The Levy applies across the whole of Camden and is charged in addition to the standard premises licence fee. All income generated is used to support the management of the borough’s night time economy, with 70% of funds allocated to the Mayor’s Office for Policing and Crime on the basis that these resources are used for policing within Camden.

Camden does provide exemptions and reductions permitted in the national guidance as follows:

- Premises are not liable to pay if they are licensed to trade between midnight and 6am only on New Year’s Day, provided these non-standard timings are on their licence.
- Premises in receipt of Small Business Rate Relief (i.e. with a rateable value of £12,000 or less) have a 30% reduction applied.
- Premises that are members of a relevant Business Improvement District (BID) and engaged in business-led best practice schemes also have a 30% reduction applied.

Payment of the Levy is made alongside the annual licence fee, with fees set nationally and based on the non-domestic rateable value of each premises, as outlined below:

#### Late Night Levy Fees (set nationally)

Band	Rateable value	Annual Levy Fee
Band A	£0-£4,300	£299
Band B	£4,301-£33,000	£768
Band C	£33,001-£87,000	£1,259
Band D	£87,001-£125,000	£1,365
Band D	(Primarily alcohol-led premises)	£2,730
Band E	£125,001 and above	£1,493
Band E	(Primarily alcohol-led premises)	£4,440

### 3. METHODOLOGY

#### 3.1 Stakeholder Engagement:

The researchers have undertaken a structured stakeholder engagement process as part of the review of Camden's Late Night Levy (LNL). This approach was designed to capture the perspectives of those directly affected by the late night economy in Camden and the Levy, ensuring 'real-world experiences' inform the findings.

The engagement has primarily been through detailed interviews or through a survey version of this interview, with a range of stakeholders, including venue operators who are paying the Levy, Business Improvement District (BID) representatives, council officers, residents and police. These conversations have provided critical insights into the financial, operational and community impacts of the LNL, reflecting the diverse challenges and opportunities faced by businesses and residents in Camden's night time economy. This stakeholder input forms a vital part of the evidence base, supporting the development of practical, balanced and impactful recommendations for the future of the Levy.

Interviews with partners have taken place online; however, the researchers conducted the majority of business engagement interviews through in-person meetings at interviewees' own premises. These interviews were conducted on three days of visits to Camden on the 1st April, 10th April and the 24th April. This was done to ensure that stakeholders who pay the Levy have been given the primary opportunity to share their views, as engaging businesses can be challenging at any time, and this is particularly the case given the current operational climate faced by the industry.

A full list of stakeholders engaged is shown below:

- A total of 90 Camden businesses subject to paying the Late Night Levy were invited to contribute their views directly by the project team. This included phone calls, email and five full days of in person-visits for a combination of pre-arranged meetings and door-to-door visits.
- Two large scale landowners provided their views. When asked if they could recommend any businesses to contribute their views, none were offered.
- The project team created a briefing note of the project, an online survey and email versions of the questions and worked in partnership with Camden Town Unlimited and The Fitzrovia Partnership to contact 42 businesses in Camden Town and 36 in Fitzrovia to contribute their views. Again, this had limited success.
- Two licensing consultants were interviewed. They recommend six businesses they thought would like to contribute, and while these were contacted, only one business (in Camden Market) engaged.
- Four pubcos were approached. This was to both seek their views generally and to directly engage their premises in the borough. During conversations, no official

response was provided but trade associations were cited as representative of their views.

- Input was provided by 12 individual venues, which included in-depth interviews and/or detailed written feedback.
- Another local BID was contacted for input, but they did not respond.
- Two police representatives (A/Chief Inspector, Camden Neighbourhood Policing Team and Camden Borough Licensing Sergeant) were interviewed.
- Two London Borough of Camden team (licensing and community safety) were interviewed.
- Three trade associations provided written responses; the British Beer and Pub Association (BBPA), UKHospitality and the Night Time Industries Association (NTIA).
- All of the borough's resident associations were sent the online survey, with two resident associations responding.

The total number of completed in-person / online interviews and returned survey versions of the interview questions was 27. It should be noted that at some of these interviews more than one person was present and that some of the larger stakeholders interviewed represent the experiences and opinions of a wider constituency e.g. residents' associations, BIDs, trade associations. Most organisations that did not respond were followed up at least twice and some up to five times.

The BIDs that engaged with this project supported the researchers with business engagement by sharing the survey with their networks. This saw the survey shared with a further 78 businesses in the borough, from which five contributed their views. Camden Town Unlimited and The Fitzrovia Partnership represented the views of these licensed businesses through their interviews with the researchers, as described in the findings.

The project team also contacted relevant trade associations for the licensed trade, namely the British Beer and Pub Association (BBPA), Night Time Industries Association (NTIA) and UKHospitality. These trade association views were sought because many businesses defer to the trade associations to represent their views for all business.

This reflects the researchers' experience at this time of business owners being severely time and resource poor, and therefore relying on business representative groups such as BIDs and trade associations to provide input in projects and processes such as this.

It should be noted that the trade associations were unable to provide the exact number of businesses within Camden that they represent and that are subject to the late night levy. Neither were the two residents' associations, which responded to the consultation, able to give the exact numbers of residents who have consented to be represented by these associations. Thus, whilst these are important and informed organisations with strong views

on the late night economy and Levy in Camden, the absence of precise membership metrics does limit our ability to assess just how representative they are.

### **3.2 Data Review**

Through the interviews with stakeholders, the researchers requested any relevant data that may help understand how the Levy operates and its impact in practice (positive, negative or neutral). Data was only received from the police. However, it is important to note that even this data from the police can only go so far as to suggest the possible impact of the Levy funding and what it has been spent on.

Attributing changes in key outcomes such as levels of crime and anti-social behaviour (ASB), economic performance, venue profitability, footfall or public perception of safety directly and solely to the presence or absence of a Late Night Levy (LNL) is not straightforward and should be approached with caution. This is because it is not possible to disaggregate the impact of the Levy from that of other crime prevention and community safety initiatives, nor to isolate it from a range of external and evolving local factors such as historic variations in footfall across different parts of the borough, changes in the demographics of those who use the night-time economy in Camden, the introduction or withdrawal of other local schemes and the opening or closure of licensed premises (including through licensing reviews) that may have had a disproportionate influence on crime and disorder in the post-midnight period. These also include impacts from national factors such as national and local policing strategies, the effects of national policy and legislation decisions, economic trends and shifts in public behaviour, such as those influenced by the cost of living or public health concerns.

## 4. KEY FINDINGS

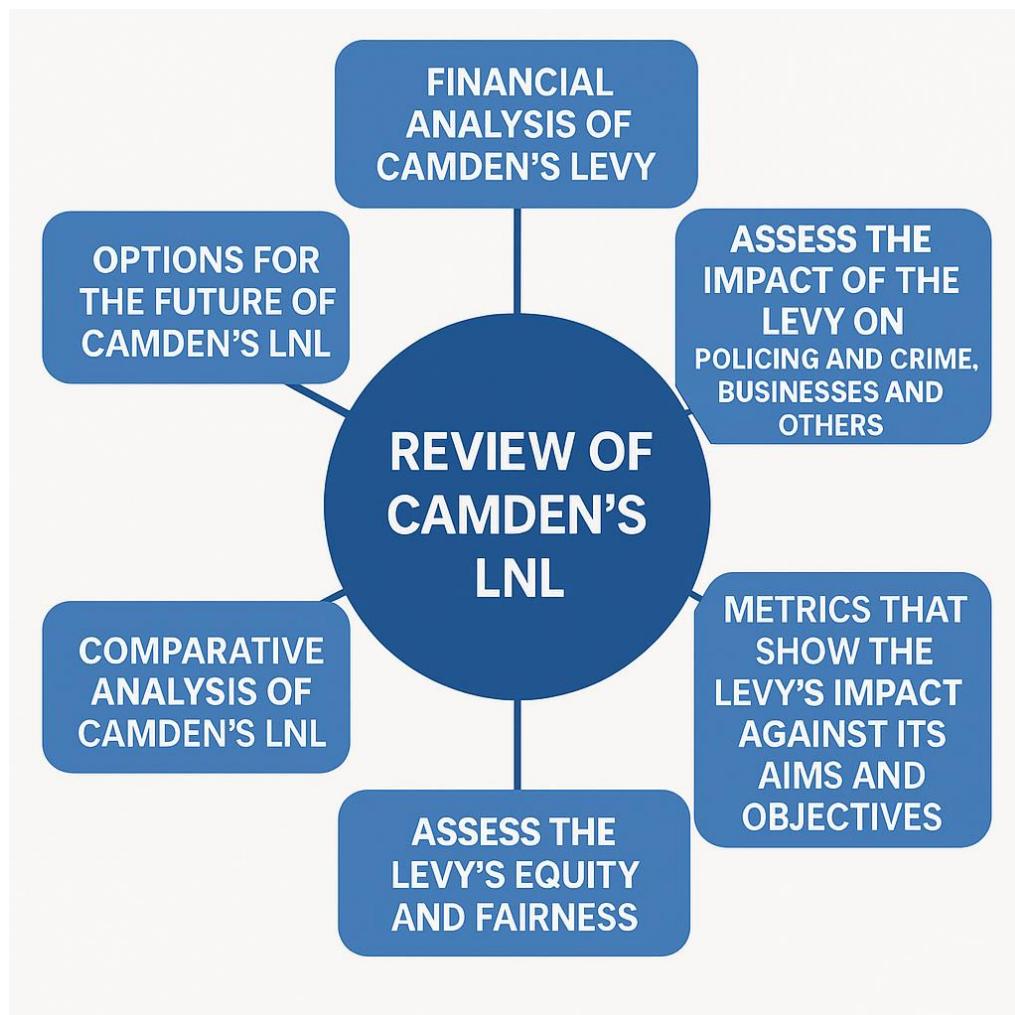
### 4.1 Introduction and scope of this review

This section presents an analysis of Camden's Late Night Levy, drawing on qualitative and quantitative evidence to understand its operation, outcomes and future potential. The themes explored reflect both the statutory aims of the Levy and the broader priorities of Camden Council and its partners in managing the borough's night time economy.

The analysis begins with a review of how the Levy is currently administered and the income it generates. We then assess its impact across a range of stakeholders, including businesses, residents and enforcement partners, using available metrics to explore how effectively the Levy is meeting its intended objectives. Alongside this, we consider issues of equity and fairness, including who pays the Levy and who benefits from it.

Camden's Levy is also considered in context. By comparing it to other schemes, it is possible to highlight areas of good practice, variation and learning. The report concludes with a set of options for the future of the Levy in Camden, based on the findings of the review and the views shared through stakeholder engagement.

The following diagram sets out the core themes that structure this section.



#### 4.2 Management of Camden's Late Night Levy and Funds Raised

The Late Night Levy Consultative Group includes representation from the council, the police superintendent and inspector, Lord Simon Pitkeathley of Camden Town Unlimited Business Improvement District, Henry Conlon of the Camden Inner London Licensees Association (CILLA) and Kenneth Wright of the Phoenix Arts Club. Camden Council's Public Protection and Licensing Manager presents a proposal for the use of the levy funds to this group each year and regular meetings are held to monitor its operation and impact. The role of the business representatives in the group includes to feed back to their stakeholders and keep them informed of the role the Levy plays.

Further to this oversight, a Licensing Police Partnerships meeting is held weekly and all responsible licensing authorities meet on a monthly basis.

Across Camden's night time economy, a number of operators interviewed demonstrated uncertainty about direction and visible outcomes associated with the Late Night Levy, suggesting that more could be done to engage businesses that pay the Levy and communicate impact. One option could be to broaden business representation on the Late Night Levy Consultative Group to strengthen engagement.

Some businesses highlighted instances where Levy income appeared to remain unspent within a given financial year and uncertainty about the allocation of the funds. They also questioned whether the current model resulted in an inconsistent approach across areas with differing levels of late-night activity, raising concerns about whether certain parts of the borough are subsidising services used more intensively elsewhere. The police state that they allocate the levy-funded additional high-visibility policing to areas driven by evidence of problems linked to the late-night economy and where it will make the greatest impact.

The council's licensing team confirmed that *all* levy income *is* spent on policing currently and any underspend is rolled over to the following year. This underspend can arise due to internal protocols linked to the processing of payments to the Metropolitan Police at the *start* of each financial year. This is something which both parties are working to improve, as this currently delays the deployment by the MPS of its levy-funded officers for two or three months after the commencement of each financial year.

In previous years, levy income has been allocated in a number of ways, including:

##### **Prior to 2021–22**

The majority of Late Night Levy income was allocated to the Metropolitan Police Service (MPS). These funds were used to part-fund a dedicated Late Night Levy Night Time Economy Team, consisting of 12 MPS officers, focused specifically on tackling late night problems within the borough.

### Changes in 2021–22 / 2022–23 / 2023–24

In 2021–22, the funding approach was revised following the establishment of two new Metropolitan Police Town Centre Teams (**not** paid for by the levy):

- **Camden Town** (25 officers)
- **South Euston** (25 officers)

This restructuring, which continued in the following two financial years, reduced the need for a standalone Late Night Levy-funded policing team and created scope for the levy to support a wider range of evening and night-time economy-related initiatives, in addition to policing, such as the work that Camden delivered around women's night safety and the Camden Town night-time Safe Haven.

### Revised approach in 2024–25

In 2024–25, further changes to MPS resourcing resulted in a return to the previous funding balance. Under this arrangement:

- **70% of Late Night Levy income** is allocated to the Metropolitan Police Service, who use the funding to provide night-time patrols around areas with problems linked to clustering of late night premises.
- **30% of income** was directed to maintaining Uri-Lifts in Camden Town (temporary public urinals), which continue to play an important role in reducing issues associated with public urination in the night-time economy.

Camden's Licensing Officers are in the process of exploring the opportunity to expand the levy paying base to include late night refreshment businesses in order to support a more equitable approach where a wider base of businesses operating late at night are contributing towards funding the reduction of crime and disorder.

### 4.3 Impact on businesses

While some businesses in the areas where high visibility policing is deployed recognised the positive impacts, including improved feelings of public safety, others reported frustration that they were contributing financially through the Levy without feeling they were receiving a proportionate benefit. In Camden Town and surrounding areas, several venues believed that there had actually been a visible *reduction* in police presence over time (see the explanation in the paragraph below for why this might be), prompting them to invest in additional door staff or private security to meet their licensing conditions. A number of operators stated that they routinely hire double - or even quadruple - the number of security staff required by their licence, citing insufficient external enforcement during late-night hours.

This frustration was compounded by reports from many businesses that when the Levy was initially introduced, it was promoted with a specific promise for additional visible policing. Many businesses were, and continue to be, agreeable to funding additional policing to a point, but they all reported that *significant* additional visible policing was not an outcome they had believed they were receiving through the introduction of the Levy. Again, there is a perception versus reality issue here. This may be due in part, and it could be a significant part, to the challenges of allocating the funds from Camden Council to the Metropolitan Police at the start of each financial year, because until this has happened, the police cannot roster any dedicated Levy-funded officers. The solution to this is to ensure that the funding is available either before the start of the financial year or as soon as possible after it commences.

MPS states that it does provide the agreed dedicated additional LNL-funded officers. Interviews indicate a gap between business expectations and what is delivered within the budget available. This is related to the question of how much policing approximately £300,000 a year can buy when it is at overtime rates and spread across a whole year and an entire borough (even if mostly concentrated in Camden Town). Without a much higher budget, it will necessarily be a limited resource that needs very careful targeting.

There is also an issue of consistency in the police's ability to provide the dedicated Levy patrols. They cannot be provided unless the council has transferred funds to the MPS and the MPS has to request specific amounts. This means that there are occasions when there are breaks in the service whilst the internal finance departments of both organisations ensure all the procedures are signed and actioned.

Finally, there is the real-world visibility of officers. This emerges as an issue because businesses, like residents, would prefer foot-based patrols and the police are mainly providing motorbike and vehicle based patrols.

Businesses operating within quieter parts of the borough, particularly those on managed estates, described the Levy as a disincentive to extend trading hours. They argued that the low risk profile of their premises and the limited late-night activity in their immediate surroundings were not adequately accounted for under the current model. Several venues reported that they had deliberately chosen not to apply for late-night extensions specifically to avoid incurring Levy charges. More broadly, many businesses framed the Levy as another financial pressure in an already challenging economic environment.

Some BIDs reported that many of their Levy-paying members were unaware that they were liable for the charge, while others lacked clarity about what, if anything, the Levy funded in their local area. Landowners and larger operators also raised the concern that businesses with robust internal services, such as in-house cleaning, CCTV, or security, may feel they are

paying twice: once through their own operational investments, and again through the Levy, for services they may not directly benefit from.

### **4.3.1 Trade Association Representations for Businesses**

#### **The British Beer & Pub Association (BBPA)**

The British Beer & Pub Association is the leading trade body representing companies across the UK, which, between them, own around 20,000 pubs and brew over 90 percent of beer sold in the UK.

Its members include international companies, national and local brewers and pub businesses operating managed and tenanted pubs in cities, towns and villages across the country.

Some of its members own and operate pubs within the London Borough of Camden. An up-to-date summary of its membership can be found [on its website](#).

#### **BBPA View on the Late Night Levy**

“In broad terms, the BBPA is of the view that a Late Night Levy (LNL), wherever it is introduced, is merely a direct and punitive tax on local businesses which are struggling to operate against strong economic headwinds – which include significant increase in staff costs, high energy costs, increase in business rates.

The BBPA feels that the current LNL framework does not work effectively to address local alcohol-related issues, does not address problematic individuals and how they behave and generally does not have the support of businesses. Indeed, the BBPA strongly believes there are far more effective local partnership methods through which to address such issues.

Many local councils have realised that businesses are vital partners when looking to reduce alcohol-related issues. A growing number of councils are rejecting the LNL and the number of councils that have chosen to implement it is currently in single figures.

Most importantly, these flaws are widely recognised, not just by businesses and other local councils but also by the House of Lords through an independent inquiry. The 2017 House of Lords committee report regarding the Licensing Act 2003 looked at all aspects of licensing in detail, including LNLs. The independent committee heard extensive evidence from all parties involved in the licensing system and concluded that *‘given the weight of evidence criticising the late night Levy... we believe on balance it has failed to achieve its objectives and should be abolished.’*

For this reason, we [The BBPA] does not agree that a LNL should be maintained in Camden.”

#### **Night Time Industries Association**

The Night Time Industries Association (NTIA) is the leading trade body representing the UK's night time economy. Its members include independent and chain late-night venues, nightclubs, bars, music venues, operators and supply chain businesses who contribute significantly to the cultural and economic fabric of our towns and cities.

The NTIA advocates on behalf of a diverse range of businesses that form the backbone of the UK's night time economy – from longstanding cultural institutions and entrepreneurial operators to grassroots venues and creative sector businesses. Many of its members operate venues in the London Borough of Camden, a borough recognised globally for its dynamic night time offering.

An up-to-date summary of the NTIA's activities can be found on its website [ntia.co.uk](http://ntia.co.uk).

### **NTIA View on LNL**

"As a representative voice for the night time economy, we are firmly of the view that a Late Night Levy (LNL), wherever implemented, operates as a direct and punitive tax on businesses already grappling with intense economic pressures – including rising staffing costs, soaring energy prices and unsustainable business rates.

The NTIA believes the current LNL framework fails to address the core issues surrounding alcohol-related harm. It disproportionately penalises responsible operators while doing little to tackle individual behaviours that lead to harm. Furthermore, it lacks broad support from the businesses it affects and undermines collaborative local partnership efforts that have proven far more effective. These approaches build trust and deliver measurable outcomes through cooperation between businesses, local authorities and enforcement bodies. Numerous local authorities across the UK have chosen to move away from the LNL, which we applaud.

In light of these considerations, the NTIA strongly opposes the continued implementation of a Late Night Levy in Camden. We urge the local authority to prioritise collaborative, intelligence-led approaches that engage businesses as partners in driving safety and reducing harm across the borough's night time economy."

### **UKHospitality**

UKHospitality is the leading trade association for the UK's hospitality sector. Representing over 740 companies operating around 100,000 venues, it serves as the authoritative voice of a vital and vibrant industry that includes restaurants, pubs, hotels, nightclubs and leisure venues. Its members include a range of businesses – from major national groups to single-site independent operators – many of whom run late-night premises across the London Borough of Camden.

An up-to-date summary of UKHospitality's policy work and campaigns can be found at [ukhospitality.org.uk](http://ukhospitality.org.uk).

### **UKHospitality View on LNL**

"As the principal trade body for hospitality businesses across the UK, UKHospitality remains firmly opposed to the introduction and continuation of Late Night Levies (LNLs). We do not believe there is a strong or evidenced link between the application of the levy and improvements in public safety or reductions in crime and disorder.

Hospitality businesses are already highly engaged in a range of voluntary and collaborative initiatives that promote safety and responsible operation – including schemes such as Best Bar None, pubwatches, BIDs and Purple Flag – and these have consistently been shown to be more effective than punitive levies.

We share the conclusions of the House of Lords Licensing Act 2003 Committee, which found that LNLs "*failed to achieve [their] objectives and should be abolished.*" Their ineffectiveness, combined with their damaging financial impact on local businesses, has been further highlighted by cases such as Cheltenham Council's decision to remove its levy after a short period due to cost, poor outcomes and lack of business support.

The current framework for LNLs imposes additional costs at a time when operators face severe and sustained pressures – from inflation, energy costs and staffing challenges to business rate hikes. If a levy is imposed, then at the very least the revenue must be ringfenced to support improvements to the visitor economy, with greater transparency and stakeholder input.

We believe the most impactful approach to building a safe and successful night time economy is through strong partnership working between the hospitality sector, local authorities, police and other stakeholders – not by placing greater burdens on the very businesses that help keep our town and city centres thriving at night."

As a methodological note, when the trade associations were asked how many businesses they represented in Camden borough, they were unable to give specifics due to how their membership is managed. For example, the BBPA said that they would like to provide exact numbers, but were unable to do so in time for the report deadline due to the resources it would take to identify members and their individual premises from their postcodes (they do not classify members by local authority unit). UKH's position is similar as it mostly represents larger corporate operators and thus deals predominantly with head offices, none of which they believed to be located in Camden. The NTIA did not reply.

However, there will be a significant number of premises represented by these trade associations, because between them UKH, the BBPA and the NTIA have nationwide operators who have a significant London presence.

For example, BBPA members include Stonegate (with 4,500+ venues nationally), Greene King (2,600+ pubs nationally), Star Pubs (2,400+ pubs nationally), as well as Punch and Wetherspoon's, both of which have just under or over 1,000 pubs nationally. Within these estates, all of the operators have a significant Camden pub / later operating venue presence. BBPA membership also includes smaller estates with significant numbers of London pubs, such as Shepherd Neame and City Pub Company, both of which have a London presence, though it is beyond the scope of the research to work out how many of these are within Camden.

Similarly, UKH counts many of these companies in their membership, as well as late-night operators and most of the main hotel operators. Many of the latter have 24hr alcohol licences that would, without exemptions, leave them open to paying the Levy.

The NTIA, whilst it did not respond to the researchers, has a membership mostly made up of individual and small regional operators. Traditionally, its membership has been London-centric and included the likes of large Camden venues such as Koko and smaller grassroots venues, but it is not clear from its website which of its current members operate in Camden.

It cannot be more than a rough approximation, but it is likely - given these trade associations' member companies own a large proportion of the UK pub, licensed venue and hotel sector - that they cover over one hundred Camden licensed premises between them.

However, because the trade associations do not organise member data by local authority area, nor do they routinely collect details on members' licensable hours, it is not possible to say how many of these premises are subject to the Levy.

#### 4.4 Impact on other stakeholders

Resident feedback on the impact of the Levy in Camden was mixed, with many respondents providing insight based on their lived experience of crime, anti-social behaviour, noise and public nuisance. This enabled researchers to understand how the effects of the Levy are perceived and felt 'on the ground'.

Some residents welcomed the principle of enhanced enforcement and a more managed night-time environment, expressing a desire for more visible policing, improved cleansing and greater attention to issues on residential side streets. Others questioned the extent to which the Levy delivers tangible benefits for communities, particularly in relation to public safety and environmental quality.

Although the Levy is primarily a mechanism that applies to businesses, some residents, particularly those living near areas of high night-time activity, felt that its operation could give greater consideration to community impacts. Their responses often reflected a wish for a balanced approach.

#### **4.5 Impact on policing and crime**

A widespread theme was the perceived absence of uniformed police at night, despite the original intent of the Levy being to fund dedicated enforcement. Several businesses described daily or weekly incidents of crime, drug dealing and antisocial behaviour, noting that police either failed to attend, attended too late or chose not to intervene when they did attend.

Council officers highlighted the potential for the Levy to enhance the current internally funded enforcement coverage on Friday and Saturday nights. This would allow the council to more actively tackle issues such as illegal street trading, public urination, littering and commercial waste offences - all of which are highly visible concerns in the borough's night time environment and contribute to perceptions of disorder and feelings of unsafety.

While some stakeholders acknowledged improvements in collaborative working with private security or BID-provided patrols, the general view was that the burden of public safety has shifted to businesses, many of whom now say they are effectively "policing their own streets". Some landowners and operators questioned whether any of the 70% police allocation was being used for frontline presence at all (the police engagement shows it is), suggesting that the Levy's impact on crime and disorder - or at least the wider user experience or perception of such - is either minimal or non-existent. As mentioned previously, there are many factors which can contribute to this. This could include reductions in police funding generally, increases in crime and so on.

#### **4.6 How the police use the Levy funding**

##### **4.6.1 Context**

The researchers interviewed the Metropolitan Police Service (MPS) responsible for delivering the Levy-funded policing operations. The following is the full, approved response from the MPS and accounts for how it is spent, the police's assessment of the impact and what happens when they are unable to provide LNL-funded officers on the street.

##### **4.6.2 MPS statement on how it currently spends its share of Camden LNL**

The Late Night Levy funding provides high visibility policing in the London Borough of Camden. Each week, we would typically provide 72 hours' worth of policing. This is additional to that which would be provided by the MPS to Camden borough otherwise.

Using data, community feedback and local intelligence, we utilise the LNL to provide a high visibility policing presence in crime hot spots. A popular and effective tactic that we've

implemented is to place a large 4x4 policing vehicle right at the forefront of Camden High Street, near the tube station. Here we have officers who engage with the public, whilst providing that reassurance and deterrent presence.

In addition, we can also bring in specialist officers to any problematic location using the funding from the LNL. An example of this is specialist motorcycle trained officers. These officers can quickly get around the area on motorbikes. They provide us with routine patrols in Camden and they too are posted to hotspots, such as outside nightclubs which experience high levels of mobile phone thefts from suspects on both bicycles and mopeds, which is referred to as P2W or C2W crime types). The motorcycle is another visual deterrent to those who may be intent on committing an offence, especially those who offend on two-wheel vehicles.

Whilst the tactic of providing routine high visibility is our main need and use for the Late Night Levy, we also run specialist operations in the borough of Camden. These typically target a specific crime type and/or area. Without the funding, these operations would not be possible, such as intelligence-led knife crime prevention and deterrent. Evidence has been provided by the police of knives that were removed due to an operation using LNL funds. Without the funds, these knives may still be on the street.

4.6.3 What would be the 'normal' policing levels in and around the night-time economy without the LNL?

'Normal' policing coverage is 24/7 and is provided by the MPS's borough Emergency Response Team (ERPT). The ERPT's primary responsibility is to respond to 999 calls, which can, of course, occur anywhere in the Camden borough. Sometimes, the ERPT may patrol Camden High Street. However, there is no guarantee of this, nor any expectation for them to do so, as they have the entire borough to police.

The ERPT has minimum staffing requirements. If the ERPT falls below this number, then officers from other strands are taken to ensure the minimum staffing levels are met. There are various reasons why staffing may fall below a minimum, such as the need for policing Central Events (protests or similar), sickness, training, etc.

This has an impact on the local policing team: the Camden Safer Neighbourhood Team (SNT) and the already additional Camden Town Centre Team (TCT), who may be taken from their regular duty to backfill the ERPT. When this happens (which is frequent), there is no or little dedicated police presence in Camden Town – our main night-time economy challenge.

With the use of the LNL funding, we have been able to dedicate officers on overtime, to specifically police in a dedicated tasking area. These officers are not redeployable by default and therefore provide a constant and visible night-time economy presence, mostly in Camden Town. This is not something that we can achieve without the use of LNL. Without LNL, the local officers may very well be 'abstracted'. Over the last few months, a rough estimate, based on abstraction data, shows the Town Centre Team has a 44% abstraction

rate. This mainly occurs over weekends, when policing in Camden for many reasons is at its highest demand.

#### 4.6.4 What is officer abstraction?

Whilst officers are often required to backfill the ERPT, it is worth noting that the SNT / TCT officers can also be abstracted for protests, central London events, training, etc. A typical Camden TCT team is made up of 1 x Sergeant and 7 x Police Constables. Yet it is rare to have such numbers available.

The TCT, who work nightshifts on Friday and Saturday - due to the nighttime economy, are the officers who mostly end up affecting arrests. Processing the arrest varies in time. An educated approximation would be that an arrest typically takes an officer (and possibly a colleague) off the street for about five hours. In many cases, this can be significantly longer, with 12+ hours not unheard of. It is rarely much shorter than four or five hours. Only on very few occasions does processing an arrest take two or three hours. The time varies based on the offence type, whether a solicitor and/or appropriate adult is required and what evidence is provided at the time.

Every arrest inevitably takes police officers away from their patrol. These officers from the local TCT work 10-hour shifts and therefore can easily spend at least half of their shifts off the street.

#### 4.6.5 Visibility of LNL-funded police officers

Using the LNL, we are inviting officers to work with the sole purpose of providing a high visibility presence in, predominantly, Camden Town. Their instruction is to remain visible, act as a deterrent and provide reassurance. This has been impactful, with positive feedback from Camden Council as well as residents who have noticed the policing presence. The police have seen a reduction in crime when these officers are present.

The reassurance role of these LNL officers then allows for the local team (SNT and TCT) to carry out their business as usual. Therefore, these other teams can then target intelligence-led criminality in their neighbourhood / Camden Town because, as the local officers, they know the area and can arrest suspects knowing there will be a continued LNL-funded policing presence when they are back at the station.

It is rare that LNL officers will arrest, due to the option of calling in the local teams to deal with that element of policing. Whilst this isn't always true, and of course, sometimes the LNL officer arrests can occur, it is not common.

#### 4.6.7 What hours and days of the week are the LNL-funded officers out on the streets?

Our high visibility policing plan usually begins on a Thursday afternoon. With a continued presence throughout mid-Friday day/afternoon, into the late afternoon and then until around 02:00 hours. This same pattern takes place on Saturday and finally ends on Sunday

at around midday. This provides us with officers mainly for the night-time economy, but it also gives us a buffer on Thursday and Sunday.

If there are policing operations, we request these are also only done over weekends, again, with a view to support the NTE if needed.

4.6.8 What data, if any, do you have on the impact so far of the LNL officer hours in the borough of Camden?

[Due to invoicing and finance procedures, we were only able to deploy 2024's] LNL funding last year from the middle of August 2024. The crime data (see accompanying graphic [appendix]) shows a decrease in most crime types *after* August 2024. Whilst this cannot categorically be attributed to the extra officers funded through the LNL, we do believe that having extra officers using the LNL had a big impact on the lower crime numbers. It took us some time to fully utilise the LNL, as we needed to create our own policing plan on how to best spend the money. The months following on from August have the highest reductions.

[Due to invoicing and finance procedures] (between April and June in 2025), we have been unable to put officers in this area. Therefore, the community will have gone from seeing the policing presence [i.e. between September 2024 and March 2025] to now [i.e. early summer 2025] not having it at all.

When there are no officers on duty funded by the LNL and the Camden Town Team conduct an arrest, we often hear over our radios that crime increases. A recent example would be when a Camden Town Team patrol had left the High Street due to an arrest. Moments later, someone was stabbed in the exact area that we had been patrolling (and would have been policed by LNL officers if we had still received the resources). This was not the only incident; there have been others since, but it is a good example of how - when the Camden Town Team is removed - there can be no other policing presence.

4.6.9 If the LNL funding was continued, what would the MPS's plans be for it?

We would like to continue more of the same. The community feedback, the falling crime data and the policing style strongly suggests it has worked very well. Whilst we are continually reviewing our tactics, we currently have no reason to consider a change to a successful formula.

4.6.10 How do the LNL officers work with the BID's wardens and the council's Community Safety Enforcement Officers (CSEOs)?

The CSEOs and council wardens are a great asset to the MPS and the LNL funded officers when out on patrol. We have regular meetings and a good working relationship. The police can easily raise an issue in a certain area and the CSEOs and wardens are likely to provide additional patrols/support to police based on our joint working relationship.

Currently, police, wardens and CSEOs conduct a joint weekly patrol. Walking through the High Street to tackle ASB and crime. This joint work is crucial to the safety of Camden and the police do need the continued support of the council.

### 4.6.11 How do you communicate how the LNL funding is used and what its impact is?

There is a monthly review meeting which covers the night-time economy and licensing held by Camden Council and the police. Attending this meeting is the Camden Town Centre Team Inspector, the Camden Licensing Team Sergeant (for the whole borough) and various members of Camden Council. The meeting is chaired by Camden Council's Head of Community Safety.

There is also a separate bi-monthly meeting which is solely to discuss the LNL [i.e. the Camden Late Night Levy Consultative Group] and this is between a representative of Camden Council [licensing team], the Camden Town Centre Team Inspector and the CEO of the BID [and on occasions the Chair of CILLA and one other licensed venue representative].

During this meeting, the police are expected to account for the current spend of the LNL and provide updates to our partners about how the funding is being used. The licensing team also then discusses any issues to do with NTE. There is often feedback provided to the police in these meetings and provides two-way conversation about whether the LNL funding is being used effectively or not.

### 4.7 Metrics that show the Levy's impact against its aims and objectives

The review found that data and evaluation mechanisms are almost entirely absent. Many stakeholders were unaware of any:

- Reporting on Levy-funded projects
- Metrics tracking reductions in crime or disorder
- Public records of meeting minutes or decision-making processes
- Feedback loops explaining how Levy-funded initiatives are assessed

Where initiatives have been delivered — including pop-up urinals, a Safe Haven or the SOS bus - there was little awareness of their impact. In some cases, operators and other stakeholders disputed whether such services were still active or whether they had ever been effective to begin with. One stakeholder described Camden's funded infrastructure as "an illusion of provision", with another calling the urinals "the emperor's new clothes".

This lack of visibility has undermined the credibility of the Levy, especially for smaller operators who feel they are contributing to a scheme with no evidence of outcomes.

A more collaborative approach to the management of the Late Night Levy and decisions around how funds are allocated could be considered. For example, establishing a Late Night Levy board with business representation, or consulting licensees annually, such as through the existing CILLA meeting, could help identify priority areas of concern and ensure that

Levy revenue is directed towards initiatives that are meaningful to those affected. This approach could improve transparency, promote shared ownership and encourage more constructive dialogue between the council and local businesses. In turn, this may enhance understanding of the Levy's purpose and build greater trust in its effectiveness as a tool for managing the night-time economy.

#### 4.8 Assessing the Levy's equity and fairness

Concerns about fairness and proportionality were prominent throughout stakeholder feedback.

Many operators felt that the Levy unfairly targets venues that are already well-managed and professionally staffed, while off-sales retailers, supermarkets, takeaway chains and delivery services remain exempt, despite contributing significantly to alcohol-related harm and late-night disruption. While the levy does currently apply to premises that sell alcohol for consumption off the premises (e.g. "off licences"), the perception is that they do not pay the Levy. Several respondents called for the Levy to be expanded to include any business selling alcohol after 9pm, whether on-site or for takeaway. It is worth noting that the midnight to 6am time restrictions of the Levy are set by the legislation.

Others highlighted that the rateable value-based charging model penalises high-turnover venues, such as grassroots music venues and cultural spaces, who already face severe financial pressure. Businesses operating in managed estates or BIDs argued that if they already provide equivalent services (e.g. 24/7 security, CCTV, cleaning), this should be recognised through exemptions or reductions. Again, it is worth noting that the LNL fees are set nationally, and that a 30% reduction in LNL fees is applied to Camden businesses that are in a BID.

There is wide agreement that most Levy-funded initiatives and enforcement activities - current and historic - are concentrated in Camden Town. However, areas such as Kilburn, Holborn, Bloomsbury and Kings Cross were cited as under-served despite having active night time economies and associated safety challenges. A number of interviewees suggested that spatial equity (relative to the spatial source of the funding), should be a priority if the Levy is retained.

A range of views were shared on proposed exemptions permissible in legislation. Most respondents supported:

- Relief for community premises, amateur sports clubs and village halls.
- Reductions for venues in BIDs or accredited through best practice schemes (such as Best Bar None).
- Exemptions for cultural venues such as theatres and businesses offering accommodation.

However, some stakeholders questioned the effectiveness or accessibility of best practice schemes and suggested Camden consider adopting a more locally tailored accreditation model, such as the Hackney Nights approach. The council also expressed concern that some local BIDs, while eligible for Levy reductions, could do more to support night time economy management in practice. For example, some are primarily active during the daytime and lack dedicated initiatives, staffing or partnerships focused on late-night issues. There was a suggestion that any future reductions should be conditional on clear, accountable contributions by BIDs to crime reduction and public safety.

## 5. COMPARATIVE ANALYSIS

### 5.1 Context

Camden's implementation of the LNL was repeatedly compared with other London boroughs and UK cities, sometimes less favourably.

- Hackney was frequently cited as a positive comparator, particularly for its Hackney Nights model. This provides businesses with free training, operational standards, radio networks and real-time alert systems, integrated with licensing and public health.
- Islington - Camden's close neighbour and another authority within the Metropolitan Police's bi-borough command unit.
- Westminster, whilst currently considering a Levy, was also viewed more favourably in terms of cross-agency working and stakeholder engagement, with regular public realm meetings, joint tasking and coordinated enforcement visible to landowners and businesses.

By contrast, Camden's approach was seen as lacking transparency (or perhaps *enough* transparency), that it appeared "top-down" and that, despite the establishment of the Late Night Levy Consultative Group, it felt like "a closed loop with no access point". These are all relatively straightforward issues to address through better and more frequent communications.

Several stakeholders reported that despite being highly engaged in place-shaping forums or borough-wide partnerships, they had never been consulted on the Levy and were unaware of any public-facing process for input or feedback.

### 5.2 Late Night Levy case study: Hackney Nights

About the project

**Hackney Nights** is a comprehensive safety initiative launched by Hackney Council in August 2019, funded by the borough's Late Night Levy. It serves as an umbrella for various programmes aimed at enhancing safety and inclusivity within Hackney's night-time economy. The initiative encompasses a range of activities, including:

1. The funding of a full time Late Night Levy Manager position to coordinate all of the following:
2. a mini-framework for venues to pre-certify compliance with the licensing objectives (The scheme also requires venues to commit to standards like zero tolerance for harassment, robust noise policies and sustainable practices.)

3. an online portal for sharing intelligence with operators about legislative changes, enforcement issues, health and safety and event-related updates from partners such as the police and council,
4. public awareness campaigns such as 'Reframe the Night',
5. night-time medics for the busiest nights in locations such as Shoreditch,
6. an online vulnerability and compliance management training package for venues,
7. an email system for alerting venues to noise reports within 48 hours to avoid delays that can lead to noise problems continuing unbeknownst to venues and enforcement escalation,
8. an online planning application notification system to alert venues about new residential developments in their vicinity, so they can object to any plan that might compromise their venue's viability e.g. noise complaints (supporting 'agent of change'),
9. a pre-application licensing advice service to support small venues applying for licences on how they can best comply with the licensing objectives, particularly when applying within Hackney's two cumulative impact areas (increasing the number of successful high quality and compliant applications).

Camden has progressed several of these initiatives through its updated ***Statement of Licensing Policy 2025-30*** and the ***Camden Evening and Night Time Economy Strategy 2024-29***, notably including best practice examples to help with pre-application support and advice, methods of stakeholder engagement to share intelligence and a noise alert process.

Venues that achieve Hackney Nights accreditation benefit from a 30% reduction in their Late Night Levy fees. Hackney states that the scheme has delivered measurable outcomes: a 40% reduction in nightlife related crime, 60% reduction in repeat noise complaints, high levels of compliance, and only 2% refusal rate among applications that engaged with the licensing advice service.

It is understood that the Levy income in Hackney is used predominantly for the Hackney Nights programme and its allied projects and interventions (notwithstanding any administration costs) and that late night policing for Shoreditch and Dalston (reportedly 31 officers on Friday and Saturday nights) is paid for through a combination of a minority of the Levy monies but augmented substantially by the MPS itself. A breakdown of the recent annual spend of the Hackney LNL is shown below.

**Hackney Late Night Levy Expenditure 2024/25**

<b>Expenditure</b>		
Training and Event Costs (Room Hire, Licences, Provision and Materials)		
Please note that this does not include officer time, which is included under salaries below.		£11,250.00
Design, Website and Printing Costs (Posters, Newsletters, Brochures)		£943.00
Salaries, Recruitment, Equipment and Administration		£249,596.00
Hackney Nights + Strategy Work		£5,000.00
Medical Assistance Program - First Responders		£15,663.00
Policing - Met Police		£181,000.00
This amount covers Jan 2024 - September 2024 (9 months)		
	<b>Total Expenditure</b>	<b>£559,466.00</b>

**Hackney Late Night Levy FORECAST Expenditure 2025/26**

<b>Forecast Budget</b>		
Police		£180,000.00
Training and Event Costs (Room Hire, Licences, Provision and Materials)		
Please note that this does not include officer time, which is included under salaries below.		£5,000.00
Design, Advertising, Website and Printing Costs (Posters, Newsletters, Brochures) and Hackney Nights portal		£10,000.00
Salaries, Recruitment, Equipment and Administration		£152,700.00
Hackney Nights + Special Deployments		£25,000.00
Intelligence Hub (NTE analytics and intelligence sharing with venues)		£8,000.00
	<b>Total Expenditure</b>	<b>£380,700.00</b>

Should the Levy be retained in Camden, the borough could benefit from exploring some of the elements of the Hackney Nights model (that are not currently being implemented in Camden), as part of future enhancements.

The Hackney Nights scheme demonstrates that a proactive, partnership-led approach can increase positive night-time safety activity while reducing crime and improving public safety. A key part of the programme is the **Hackney Nights Accreditation Scheme**, which functions

as a mini-framework for venues to pre-certify compliance with the Licensing Objectives. Venues that achieve accreditation benefit from a 30% reduction in their Late Night Levy fees, incentivising best practice in safety and community engagement.

Developed in collaboration with the responsible authorities, the scheme prepares operators with clear operating plans, encourages high standards across safety, inclusivity, and wellbeing, and integrates with licensing advice and enforcement. Combined with the aforementioned intelligence sharing, dedicated night-time medics, noise alert systems and targeted training, the scheme has delivered measurable outcomes: a 40% reduction in nightlife related crime, 60% reduction in repeat noise complaints, high levels of compliance, and only 2% refusal rate among applications that engaged with the licensing advice service. Hackney's experience shows that increased activity can be managed safely and successfully when licensing is delivered through a collaborative, strategic model.

The free pre-application advice service, taking a pro-business approach, had a success rate of 98% most of which were applications to extend licensable hours. The advice service conducted 198 advice sessions in 2024. However, 50% of all new premises license inquiries did not progress to the application stage. Many potential applicants found the Licensing regime too onerous and complicated. This resulted in a high number of community organisations and entrepreneurs failing to open their own premises.

Through these initiatives, Hackney Nights aims to create a safer, more welcoming night-time environment for residents, visitors and businesses alike. By fostering collaboration between the council, police and local venues, the program seeks to balance the vibrancy of Hackney's nightlife with the well-being of the community.

### **5.3 Late Night Levy Case Study: Islington**

#### **Context**

Camden's neighbour Islington has a more traditional approach to the use of its Levy than Hackney, although it is not without innovation.

It was the first adopter of the Late Night Levy among London boroughs, introducing it in November 2014.

#### **Governance**

A Late Night Levy Board was established in 2014 to oversee the governance and funding allocation of the net Levy. The Board includes the Licensing Committee Chair, the Executive Member for Community Safety, police representatives and licensee stakeholders.

#### **Exemptions**

Certain premises have been exempted from paying the Levy by Islington:

- Those only authorised for that late-night period on New Year's Day

- Premises providing overnight accommodation where alcohol is served only to guests staying on-site
- Temporary Event Notices

### Best practice scheme

Islington offers a voluntary "[Late-Night Levy Best Practice Scheme](#)", a free membership rewarding premises that demonstrate commitment to reducing alcohol-related crime and disorder. Members receive a 30% reduction on their LNL fees. This works as follows:

- Operators apply via a self-assessment form, providing evidence of meeting standards to qualify.
- Applications are reviewed by the council and police. This may include site inspections, with clear appeals if refused.
- Accredited premises are regularly monitored, and non-compliance can result in losing the reduction for 12 months.

### Funding arrangements

Islington's *Late Night Levy Report 2024*\* states that the levy income is first reduced by the administrative costs, then at least 70% goes to the Metropolitan Police; Islington has the flexibility to allocate up to 100% if appropriate. In recent years in Islington, the Council, Metropolitan Police and MOPAC have agreed to pool levy income to fund Operation Nightsafe (see below) and dedicated night-time policing activities.

The *Late Night Levy Report 2024* states that the levy was used as follows:

### Operation Nightsafe

The aim of Operation Nightsafe is to support and promote the late night economy in Islington by:

- providing a safe, welcoming night time environment for residents, workers and visitors,
- reducing late night alcohol related crime, disorder, antisocial behaviour and nuisance,
- minimising negative impacts on local residents.

Operation Nightsafe funds three distinct, but complementary, elements:

- The provision of two dedicated police officers to coordinate night time economy policing (see below), using information and intelligence, and to carry out follow up support and enforcement activities,
- Funding two dedicated police officers to police the Night Time Economy every Friday and Saturday night, this is called Operation Leuctra (see below),

- The provision of a high visibility street based patrol service four nights per week with the capacity to provide assistance.

### **Police activities**

The Late Night Levy funds:

- A dedicated police sergeant to act as a Night Time Economy Coordinator.
- A dedicated police constable to work on operational night time activities, and lead on day time follow up and engagement activities.

Night time policing is carried out by officers drawn from neighbourhood, emergency and special police constabulary teams. The Night Time Economy Coordinator is responsible for collating intelligence and using this information to task and brief officers prior to deployment; thus ensuring that resources target hotspot areas, problem-solving activities and call response. The police utilise various tactics including high visibility pulse patrolling, visiting licenced premises, use of passive drugs dogs, taxi-touting operations and CCTV targeted patrols. Funding the Night Time Economy Coordinator has enabled capacity building, resulting in improved consistency and effectiveness of policing the night-time economy, particularly in relation to investigation, linking in with CID and reporting issues of concern for day time follow up by Police Licensing Officers.

During the day, the dedicated police officers focus on:

- Reviewing crime reports connected to late night licensed premises and taking appropriate follow up action,
- Working with licensed premises to promote and share best practice,
- Dealing with problematic premises using a range of tools from action planning to reviews,
- Preparing and delivering briefings for Operation Leuctra,
- Briefing and training staff working in late night venues or matters that can reduce crime and improve safety in the night time economy, such as 'Ask For Angela', Welfare & Vulnerability Engagement (WAVE) and preventing drink spiking.

### **Operation Leuctra**

This recent initiative, which started in early 2022, is coordinated by the Islington Police Licensing Team. The aim is to reduce violence, robbery and drug offences in the NTE areas identified as having the highest crime rates. It brings together uniformed police officers, plain clothes officers, the Operation Nightsafe team, local authority officers and venue security staff.

Officers are deployed to these known hotspot areas each Friday and Saturday night. The Police Licensing team holds a street briefing every Saturday night at various points across the borough. Venue management and security are invited to attend along with police officers and Operation Nightsafe officers to share information and discuss current crime

trends. This has proved to be an excellent method of promoting partnership working and creating a ‘one team’ approach to tackling crime and disorder.

The Late Night Levy has provided match funding to cover the cost of two police officers working Fridays and Saturdays since April 2022. The police fund the additional 2-5 police officers deployed each weekend for Operation Leuctra.

### **Operation Nightsafe Patrol Team**

The Late Night Levy funds the Nightsafe Patrol Team, a four-person police accredited street-based tasking team provided by Parkguard Ltd. The team operates four nights per week, usually Thursdays to Sundays and covers the whole borough with locations of work being determined on a nightly basis by intelligence lead tasking, call response and police lead briefings.

The Nightsafe Patrol provides:

- A rapid response to requests for assistance from licence holders paying the late night levy,
- An early intervention style of approach to minimise demands on the emergency services,
- Medical and police support where needed,
- Assistance to members of the public in need,
- Enforcement action against offenders,
- High visibility patrols.

The service has filled significant gaps in the management of the night-time economy in Islington. The dedicated street-based patrol team, resourced by four regular officers, provides an early intervention style approach by responding to low-level, potential or emerging problems. By engaging with people on the street, supporting door staff dealing with difficult customers and providing a rapid response to licence holder requests for assistance, the Nightsafe Patrol Officers' interventions invariably prevent escalation requiring emergency services support.

Another gap filled by Nightsafe Patrol Officers is their ability to help vulnerable people, many of whom are temporarily vulnerable due to the effects of alcohol. Typical activities have included providing welfare checks and personal safety advice, calling taxis, providing a temporary safe haven and first aid or medical assistance. One officer per shift is trained in first aid to ‘first on the scene level’ and their skills have been utilised on many occasions to assist a casualty until the ambulance service arrives.

### **Income**

In 2022/23 was £459,551. Of this total, £401,481 was spent on Operation Nightsafe and policing and £58,070 was carried over to the following financial year.

**\*Note.** Islington were asked for verification of the information presented above, but have not yet confirmed to the researchers whether the summary above (which was taken from its 2024 Late Night Levy Report - for the financial year 2022/23) was still broadly the same for the financial years 2023/24 and 2024/25.

### 5.4 National context

The national picture gives further context, with some authorities having introduced and maintained the Levy, some have subsequently removed it and some decided not to introduce a Levy, opting instead for alternative arrangements.

#### **Areas deciding not to introduce the Levy:**

- Birmingham
- Manchester
- Leeds
- Bristol

#### **Areas where the Levy was introduced and subsequently removed:**

- Nottingham
- Cheltenham
- Southampton

#### **Areas where the Levy was introduced and continues to operate:**

- Newcastle upon Tyne
- City of London
- Islington
- Camden
- Hackney
- Tower Hamlets
- Southwark
- Bolton (from 1st February 2025)
- Liverpool

## 6. OPTIONS

### 6.1 Introduction

Below are the three options that have emerged as feasible options regarding the Late Night Levy in Camden.

### 6.2 The options

#### OPTION A: Remove the Levy

This option was supported by several businesses and by the UK-wide trade associations.

Their arguments included:

- Minimal or no demonstrated impact
- Duplication of existing voluntary partnership schemes
- Administrative burden outweighing benefit
- Negative economic signal during a fragile recovery period

They advocated instead for enhanced investment in partnership models, such as Pubwatch, Best Bar None, Purple Flag, BIDs and business-led safety hubs.

Balanced against these potential benefits to businesses If the Levy is removed, the most significant impact would be the loss of the additional weekly 72 hours of high visibility policing in the London Borough of Camden.

#### OPTION B: Retain and significantly modify how the Levy is managed and used

This was the preferred approach for most stakeholders, who outlined the following priority actions, each of which are independent potential reforms and can therefore be considered separately rather than in totality:

##### *1. Enhance Transparency and Accountability*

- Publish an annual report detailing Levy income, expenditure and project outcomes with a monthly one-page written update from the police on LNL officer hours deployed, activities undertaken and impact (e.g. arrests).
  - Example: City of London produces an annual report to the Licensing Committee, with a leaflet distributed to licensed premises, highlights the impacts of the funds spent.
  - Example: Tower Hamlets also produces an annual report to the licensing committee, an example of which can be seen here: [Late Night Levy Annual Review.pdf](#)

- Widen membership of the Late Night Levy Consultative Group by adding more businesses alongside council licensing and community safety officers and police.
  - Example: Hackney established a local management board that meets quarterly and is responsible for overseeing how the Levy proceeds are spent. The board includes representatives from licensed premises who are required to pay the levy, as well as police and Council officers.
- Introduce six-monthly spending reviews with published minutes.
  - Example: Worcester BID publishes all the activities that they have implemented as part of their previous term and asks their members to score them on how well they feel they have worked. [BID4 - Worcester BID](#)

### *2. Shift to Targeted, Area-Based Charging*

- Apply the Levy only to zones with high levels of night-time activity and need
  - Example: Bolton Council's Late Night Levy only covers the town centre and is applied only to businesses with a licence to sell alcohol between 3am and 6am - [Bolton Council approves introduction of Late Night Levy - Poppleston Allen](#)
- Use footfall, crime and licensing data to define zones annually
- Ensure funding is ringfenced and spent where it is raised

### *3. Review Base of Contribution including Exemptions/Reductions*

- Extend the Levy to Late Night Refreshment premises (council legal opinion pending)
  - Example: This was something that Bolton Council considered when consulting on the introduction of Late Night Levy there - [late-night-levy-findings-2024-town-centre-food-refreshment-premises](#)
- Relief for community premises, amateur sports clubs and village halls
  - Example: Tower Hamlets exempts premises with overnight accommodation, theatres and cinema, bingo halls, community amateur sports clubs, community premises and New Year's Eve premises only.
- Reductions for venues in BIDs or accredited through best practice schemes (such as Best Bar None)
- A requirement for BIDs to evidence activity that contributes to reducing the negative impacts of night time economy activity for their levy paying businesses to benefit from the 30% reduction

#### 4. Embed in a Strategic Framework

- Align the Levy with Camden's night time economy strategy
  - Example: The [Good Evening Hackney](#) strategy
- Link to schemes such as Purple Flag and integrate with Citizens' Assembly recommendations.
  - Example. Before removing the Levy, Nottingham commissioned a review of the effectiveness of the interventions it funded using the Purple Flag framework, with costed recommendations for how the Levy should be spent.
- Consider appointing a Late Night Manager, with a clear brief to coordinate safety, vibrancy and engagement.
  - Example: In Tower Hamlets, the dedicated Late Night Levy Officer coordinates the Levy Initiatives, supports better engagement with licensed businesses, with the ability to promote national initiatives such as Ask Angela, Operation Make Safe, WAVE, Best Bar None and Conflict Awareness Training. This role also includes attending Pub Watch Meetings and attends the multi-agency meetings to provide feedback on the Levy initiatives' outcomes.

#### OPTION C: Retain the Late Night Levy broadly as it is now

Favoured by the police, this would involve retaining the Levy with the funding apportionment from the Levy continuing to fund dedicated police interventions for the NTE.

If agreed upon, this option should be accompanied by enhanced communications (particularly with businesses) about the activity being funded by the Levy and its impact on its objectives. This could be achieved by also including point 1 (Enhance Transparency and Accountability) from Option B (above).

#### **1. Enhance Transparency and Accountability**

- Publish a more detailed annual report detailing Levy income, expenditure and project outcomes with a monthly one-pager written updates from the police on LNL officer hours deployed, activities undertaken and impact (e.g. arrests)
- Widen membership of the Late Night Levy Consultative Group by adding more businesses alongside council licensing and community safety officers and police.
- Introduce six-monthly spending reviews with published minutes.

## 7. Appendices

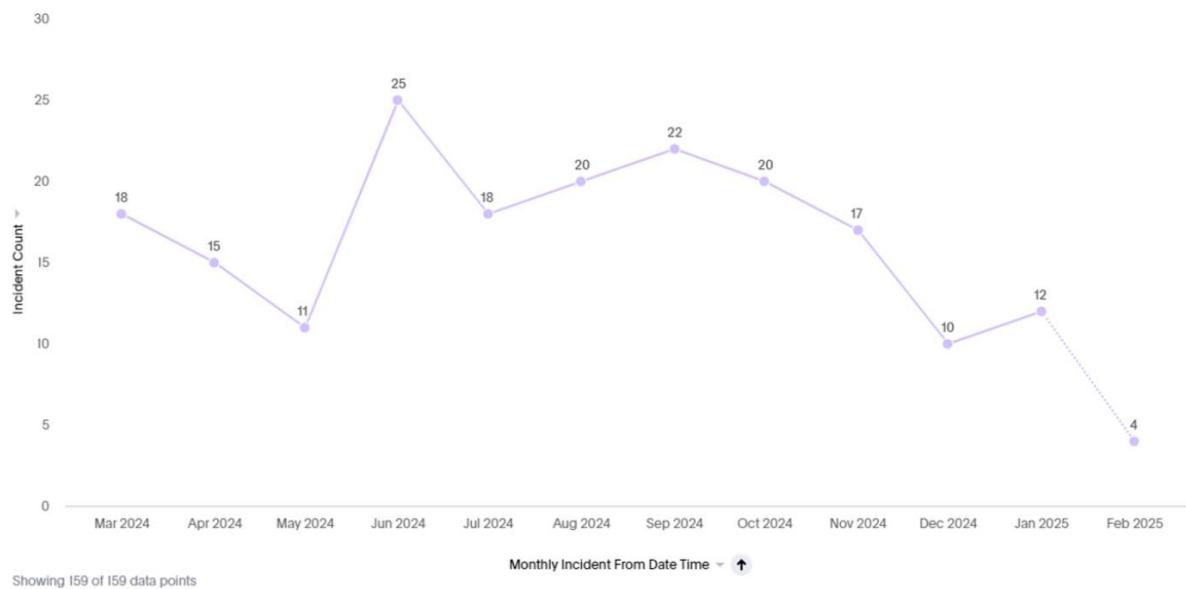
### 7.1 Appendix 1: Police statistics

The charts below were provided by the MPS, showing a 12-14 month period of crime types from 2024 to 2025 in Camden Town, where most of the LNL-funded police resources are deployed.

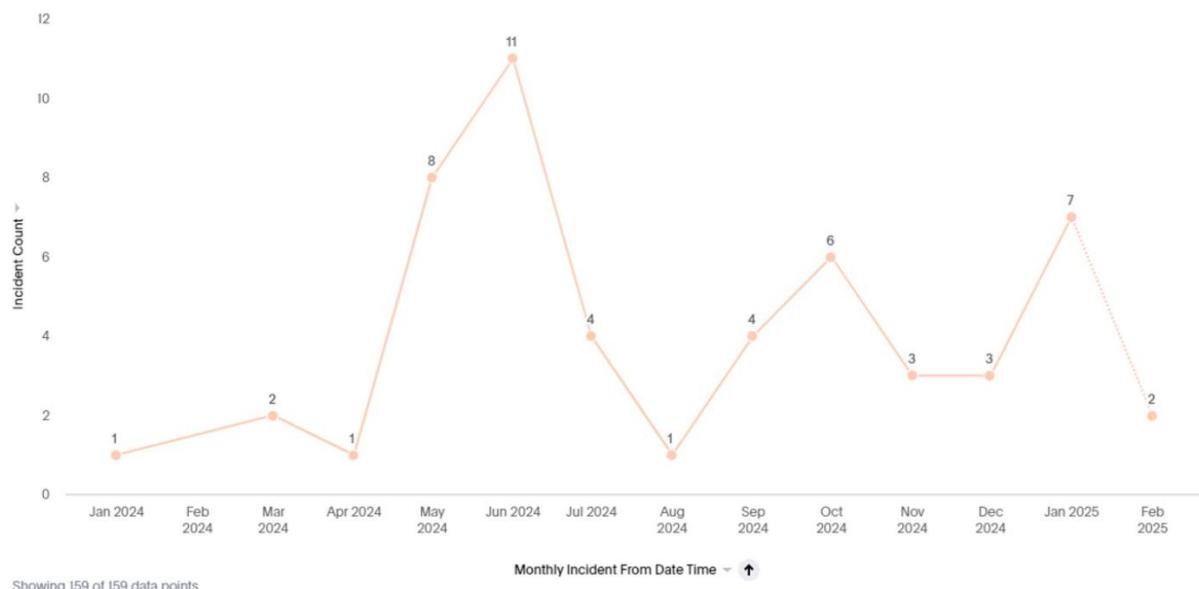
From April 2024 until September 2024, the funding from the LNL was not available to the police as the funding agreement was developed and signed off (in mid-August 2024). This provides a useful point of reference for any possible impact that could be linked to when the LNL officers were deployed.

It should be noted that it is not possible to isolate whether it was the deployment of these additional LNL-funded officers that has led to many of the reductions seen in crime below or whether it was other factors, or a combination of both. But the statistics do show that most of the crime types do begin to fall around September 2024 (with the occasional spike).

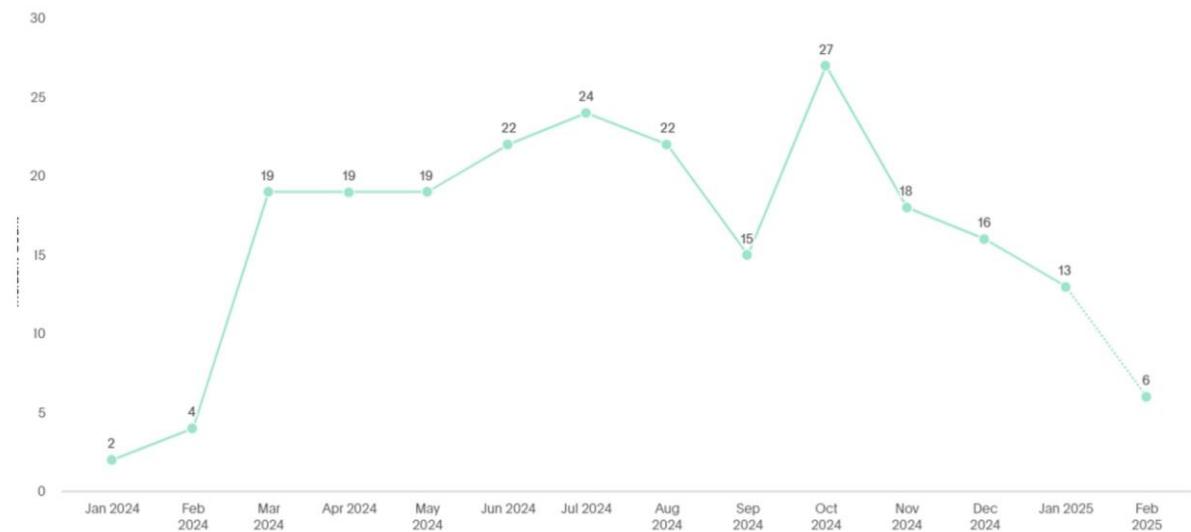
### ROBBERY, Camden Town, March 2024 to February 2025



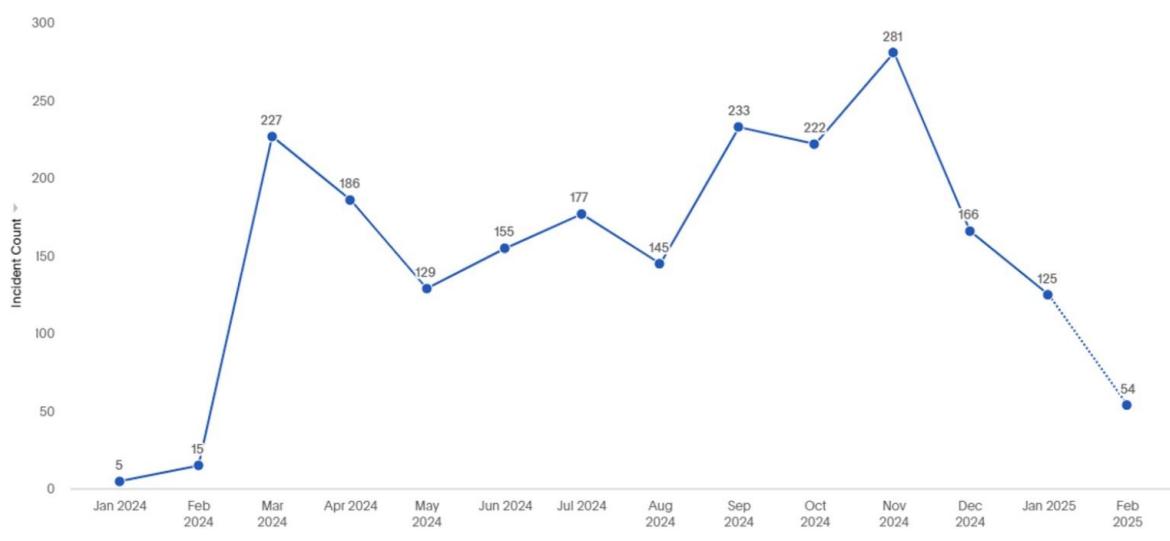
### SEXUAL OFFENCES, Camden Town, January 2024 to February 2025



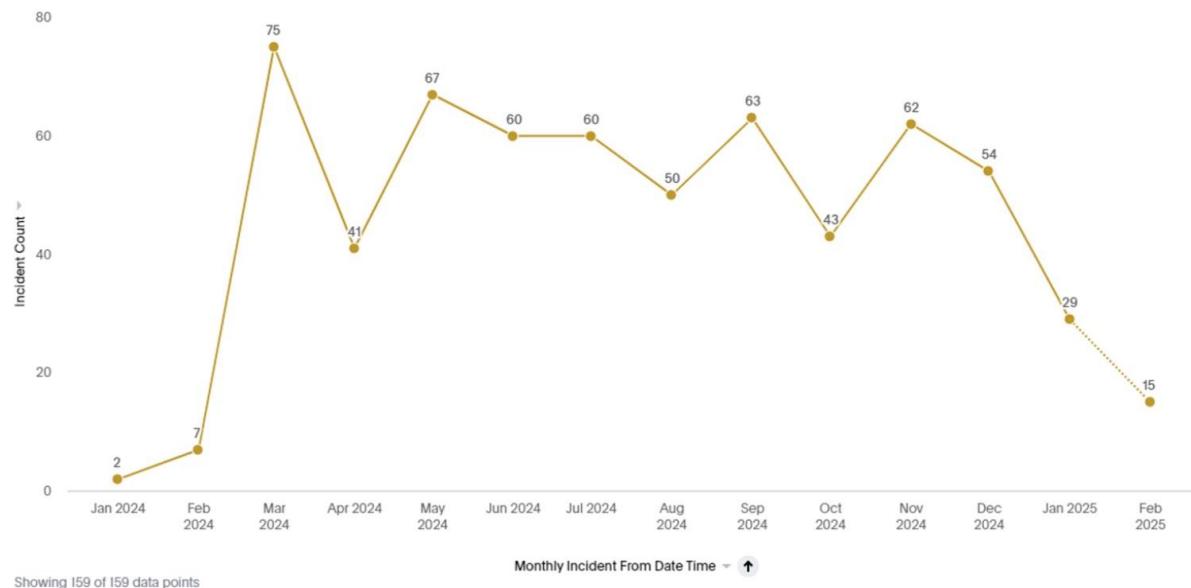
**PUBLIC ORDER, Camden Town, January 2024 to February 2025**



**THEFT, Camden Town, January 2024 to February 2025**



**VIOLENCE AGAINST THE PERSON, Camden Town, January 2024 to February 2025**



**CRIMINAL DAMAGE [inc ARSON], Camden Town, February 2024 to February 2025**

