



Animal licensing & Welfare within ELDC

Charlotte Alexander - Animal Welfare Inspector

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Introductions

My Role



Legislation & Regulations



*ANIMAL WELFARE ACT 2006
*DANGEROUS WILD ANIMALS ACT 1976
*ZOO LICENSING ACT 1981



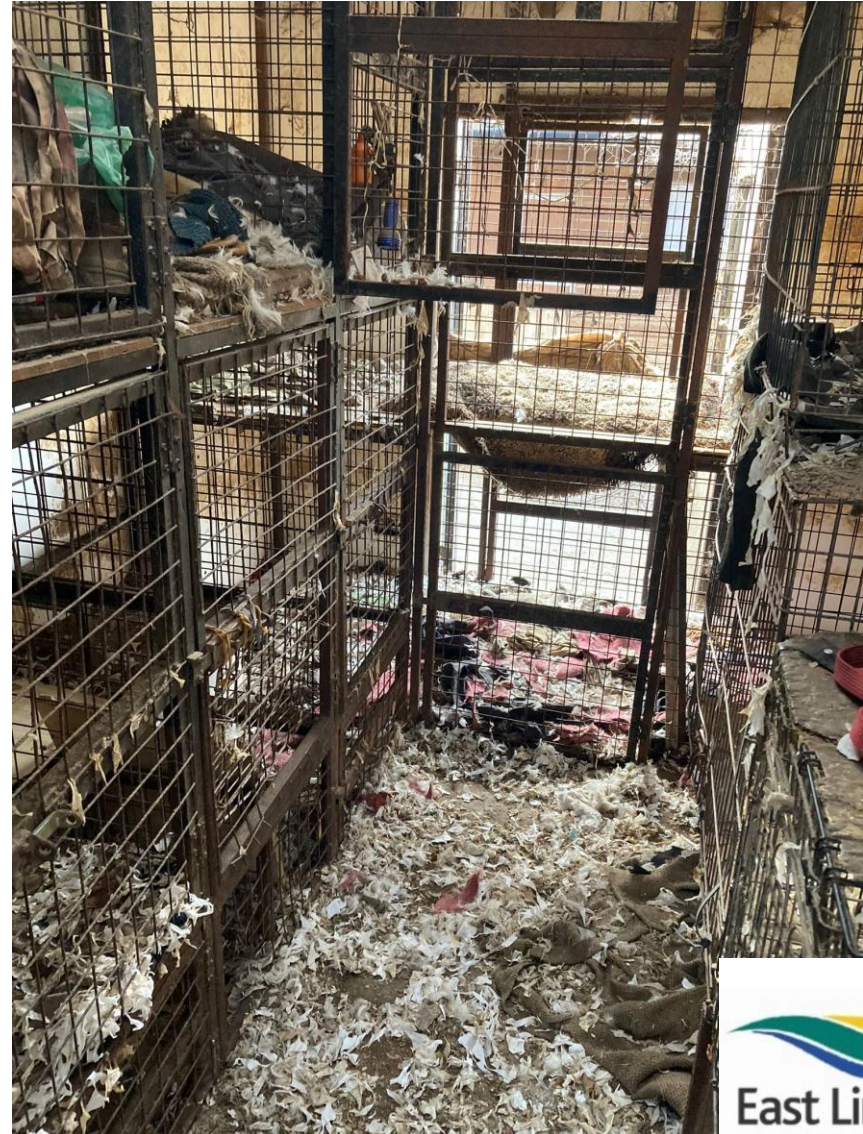
* THE ANIMAL WELFARE (LICENSING OF ACTIVITIES
INVOLVING ANIMALS) REGULATIONS 2018
*THE ANIMAL WELFARE (PRIMATE LICENSING)
REGULATIONS 2023
*THE SECRETARY OF STATE'S STANDARDS OF MODERN
ZOO PRACTICE *

Case Study 1 – hoarding of dogs

- ❖ Various department involvement
- ❖ Outside agencies
- ❖ Section 4 offences- causing unnecessary suffering
- ❖ Section 9 offences – failure to meet the needs of the animals
- ❖ Section 18 - take into possession if the animal is suffering OR likely to suffer if the circumstances don't change









Case Study 2 – hoarding of cats

- ❖ Various department involvement
- ❖ Outside agencies
- ❖ Section 10 improvement notices
- ❖ Section 4 offences- causing unnecessary suffering
- ❖ Section 9 offences – failure to meet the needs of the animals
- ❖ Section 18 - take into possession if the animal is suffering OR likely to suffer if the circumstances don't change









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Thank you



PIF

Pet Industry Federation

An industry perspective

Animal Activity

Licensing

Eight Years On!

Nigel Baker – CEO Pet Industry Federation

1 October licensing session

What I want to cover

Three linked pieces of evidence, and what they mean for licensing officers

1. The market has changed

2. Licence fees are rising

3. Methodology matters

The 2025 PIF report looked at national returns.

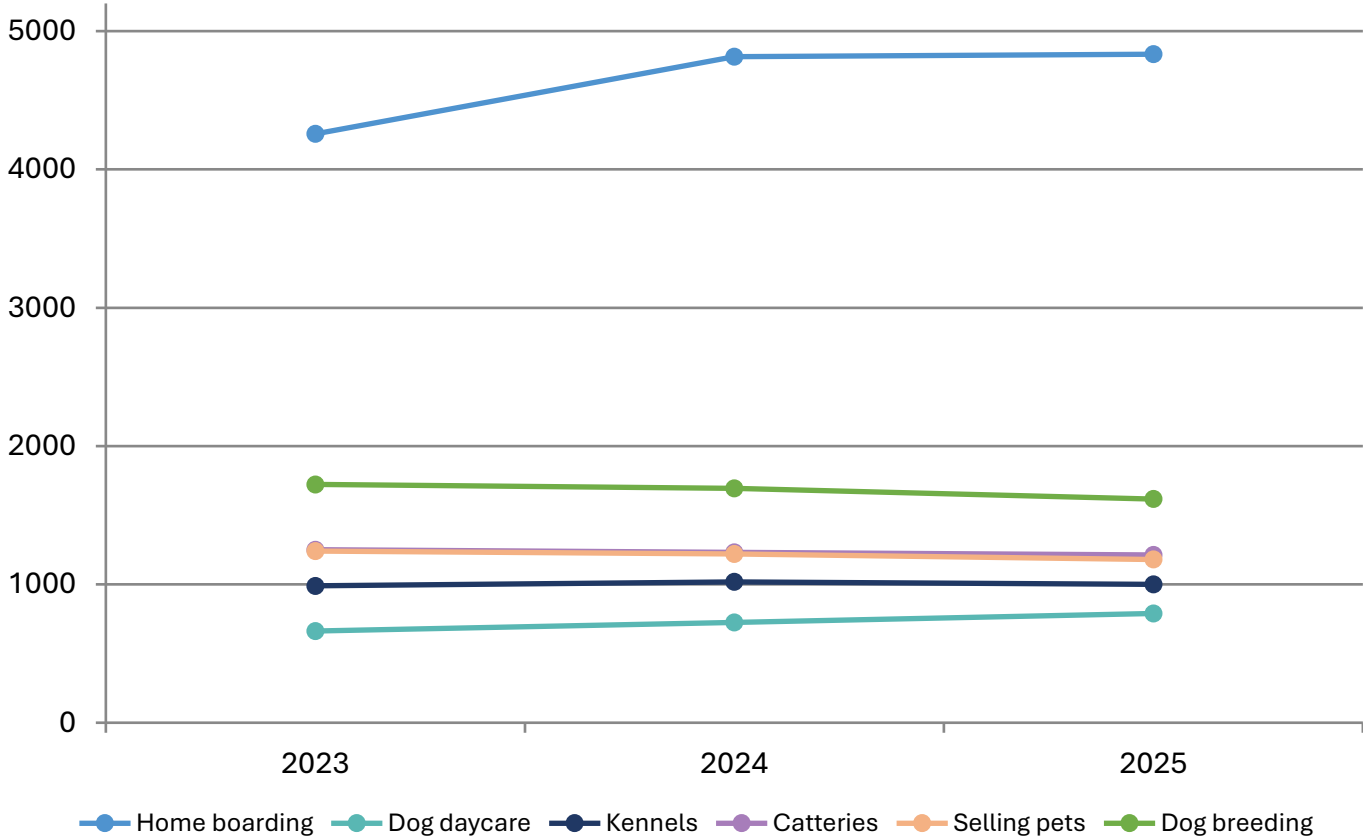
The 2026 FOI work asks a different question: not just what councils charge, but how the fee is built.

Can a licensed business understand what it is paying for?



The sector is changing

National returns show growth in care-based services and pressure on traditional models



+14%
Home boarding, 2023 to 2025

+19%
Dog daycare, 2023 to 2025

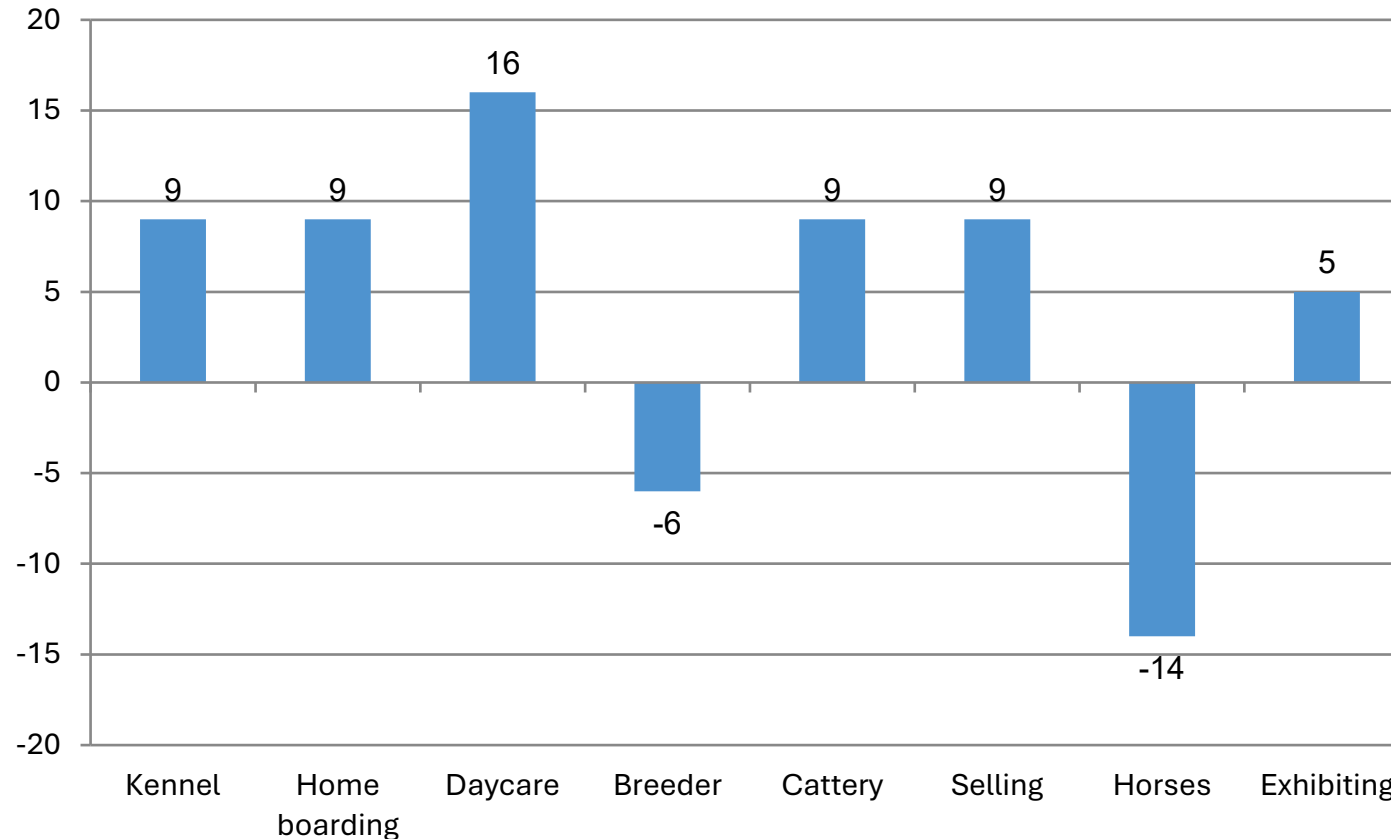
-5%
Selling pets, 2023 to 2025

-3%
Catteries, 2023 to 2025

This is not a static sector.
Licensing workloads are moving as business models change.

Fees are rising, but not evenly

Average first-year licence fee changes between 2024 and 2025



**Overall average
£ increase: 9%**

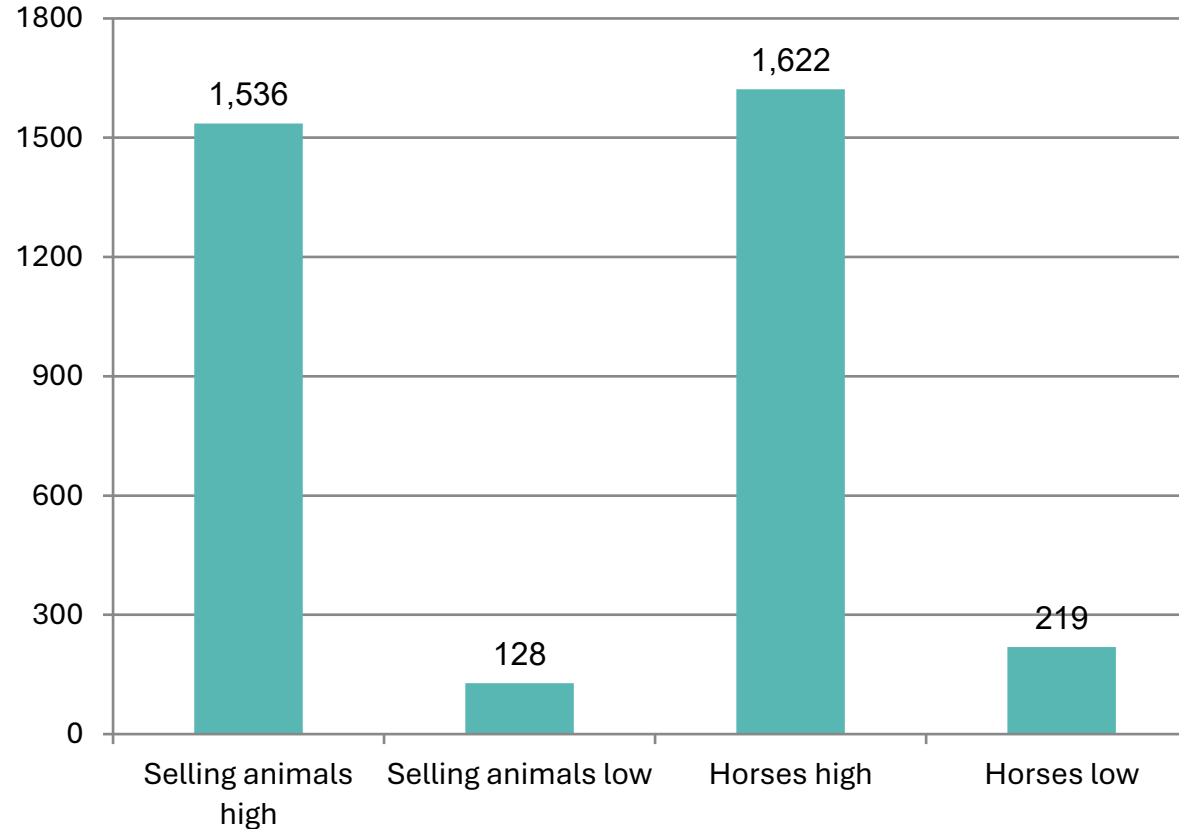
- **Daycare rose most sharply at +16%.**
- **Kennels, home boarding, catteries and selling animals each rose around +9%.**
- **Breeding and horse licences fell in the matched data.**

Headline movement does not explain whether fees are properly calculated.

The same statutory regime produces very different charges

Fee variation is not automatically wrong, but it must be explainable

Examples from 2025 returns in £'s



The point for local authorities is not that every fee should be the same.

Local costs and service models differ.
Inspection complexity differs.

Veterinary costs and travel differ.

**But the methodology should
be
transparent and defensible.**

Data quality is part of the problem

National returns are useful, but still difficult to compare year on year

195

matched local authorities
with usable 2023 to 2025
data

225

matched local
authorities with
usable 2024 to 2025
data

271

authorities reporting
in 2025, but not all
data was complete or
comparable

?

spurious swings and
changing authority
names weaken
analysis

Why this matters

- Returns are mandatory, but not always complete.
- Authority names change between returns.
- Some values appear implausible and distort averages.
- Blank or zero fees can make averages misleading.

Practical improvement

- 1. Use a stable local authority code.**
- 2. Validate numbers before publication.**
- 3. Make year-on-year comparisons easier.**
- 4. Publish clearer explanatory notes.**

It sounds simple until you try to license it

Real examples show why animal licensing is difficult in practice

1

Paid dog care at home

Occasional help, business, home boarding, or day care?

2

Day care in a residential setting

Does the premises type decide the activity, or does the service provided?

3

Platform and arranger models

Who needs the licence in a franchise or platform model?

4

A star rating after a complaint

Is it a welfare investigation, compliance visit, rating review, or all three?

5

Unlicensed operators

How should enforcement costs be evidenced and attributed?

Framing for officers

The answer usually depends on
evidence, not labels.

Look at the premises, trading activity,
overnight stay, arranger role,
conditions, compliance history and
welfare risk.

But Decisions need a clear trail

Complexity is not a weakness in the regime, but unexplained inconsistency is.

Boundaries that cause confusion

The public sees pet care as one service. The regulations do not.

Dog walking

Usually not animal activity licensing, but may sit alongside licensed services

House sitting

Care in the owner's home is different from provider home boarding.

Dog day care

Daytime care away from the owner. No overnight stay.

Home boarding

Domestic home environment. Overnight accommodation changes the analysis.

Arrangers

Websites, franchises or agents may need arranger licensing.

Why this matters

Small operators may not recognise when informal pet care becomes licensable . Clear public guidance reduces accidental non-compliance and makes enforcement more defensible.

Problems with the current licensing guidelines



Modern pet care does not fit into neat labels!

Rover and online platforms

A platform listing does not decide whether a licence is needed.

The question is whether the sitter is operating as a business and providing or arranging boarding or day care.

“Dog hotels” and hybrid services

“Dog hotel” is a marketing phrase, not a licensing category.

Look at the facts: kennels, home boarding, day care, arranging services, transport, or a combination.

identify the operator, the premises and the activity before applying the conditions.

Outdoor dog day care: space is not just a number

The 6 sq m rule has to be applied to the whole welfare picture

What the guidance says

Each dog should have 6 sq m available within the premises.

This can include **inside** and **outside** space.

Where it gets difficult

Outdoor operators may have plenty of land but limited indoor space.

Dogs still need rest, shelter, temperature control and separation when needed.

What officers need

A reasoned decision trail based on layout, staffing, welfare risk and the number of dogs.

Not just a square metre calculation.

If there are five acres outside, how much indoor space is enough or does the indoor space dictate how many dogs are allowed?

Alphas Canine Care v Ealing: reasons matter

The point is not “approve everything”. The point is to explain the decision properly.

The facts

The operator applied for dog day care for up to 46 dogs from premises the council treated as residential.

The refusal issue

The refusal relied on the view that dog day care could not be licensed from a residential home.

The Tribunal point

The case had to be reconsidered because the reasoning was not sufficiently specific and evidenced.

Guidance is not a substitute for reasons linked to the facts of the case.

Thresholds: when does activity become licensable?

The grey area is not the number alone. It is whether the activity is commercial and evidenced.

The £1,000 point

Below the HMRC trading income allowance, Defra guidance says a licence is not required. Above £1,000 is not automatic licensing.

Dog breeding

3+ litters in 12 months and any puppy sold triggers licensing.
Advertising as a breeding business can also trigger it.

Selling puppies

A pet-sales licence is not a route around breeding controls. Puppies and kittens may only be sold by their breeder, who must evidence control over breeding and rearing.

Business evidence, litters, sales and advertising

The 6-dog figure

The 4-dog figure

The practical conflict

Test: separate LAIA from PSPOs and land rules

Who licences the breeder supplying the pet shop?

A commercial rabbit breeder sells only to licensed pet shops. It never sells directly to the public.

The familiar position

The pet shop needs a Selling Animals as Pets licence because it sells the rabbits to the public.

But what about the breeder?

The breeder is selling rabbits only B2B. Does it also need a 'Selling Animals as Pets' licence?

The wording creates the question

Schedule 1 covers selling animals as pets “or with a view to their being later resold as pets”. Does that bring the commercial breeder into licensing too?

If so, how consistently is this understood and enforced?



The 2026 PIF FOI REPORT

Why PIF moved from data analysis to FOI requests

The national returns show what is charged. FOI responses show how fees are calculated.

The FOI questions

- *Current fee schedules.*
- *Fee-setting methodology.*
- *Officer hourly rates and on-costs.*
- *Full cost recovery basis.*
- *Approval and review route.*
- *Surpluses, deficits and treatment in future fees.*

The working hypothesis

Fee variation may be less about animal welfare standards and more about local interpretation of cost recovery.

That is why methodology is now the centre of the work.

The national benchmark

Defra guidance, Regulation 13 and LGA guidance provide the test

Regulation 13 allows recovery for

- Considering applications and inspections.
- Checking compliance.
- Enforcement against unlicensed operators.
- Secretary of State reporting.

Defra says fees must be

- Fair and reasonable.
- Based on risk and compliance history.
- Connected to the licensing scheme.
- Transparent enough to explain.

LGA guidance expects

- Application and ongoing costs separated.
- No profit from fees.
- Regular review and reconciliation.
- Surpluses and deficits carried within the scheme.

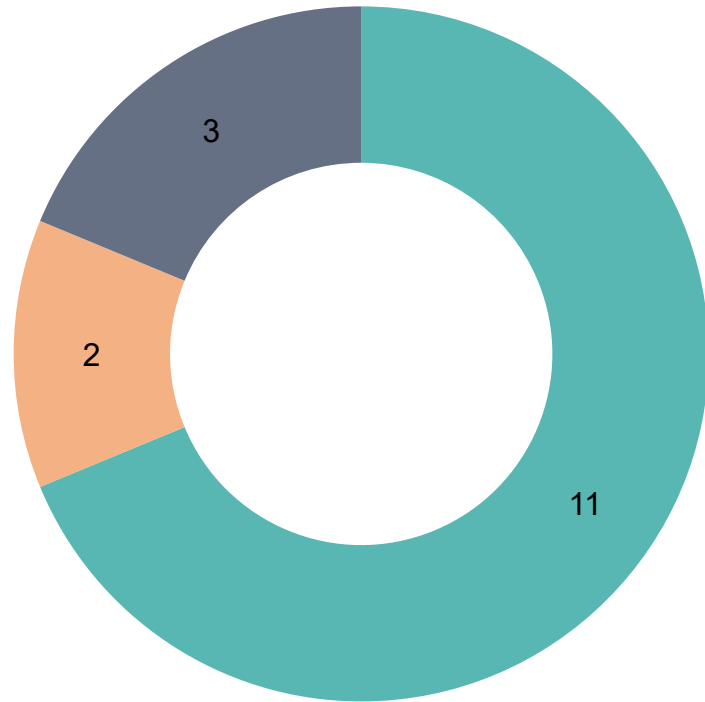
Important balance: enforcement against unlicensed operators is expressly recoverable under the animal licensing regime, but it still needs to be reasonable and evidenced.

What the FOI work found

The same phrase, full cost recovery, is being applied in different ways

Key finding

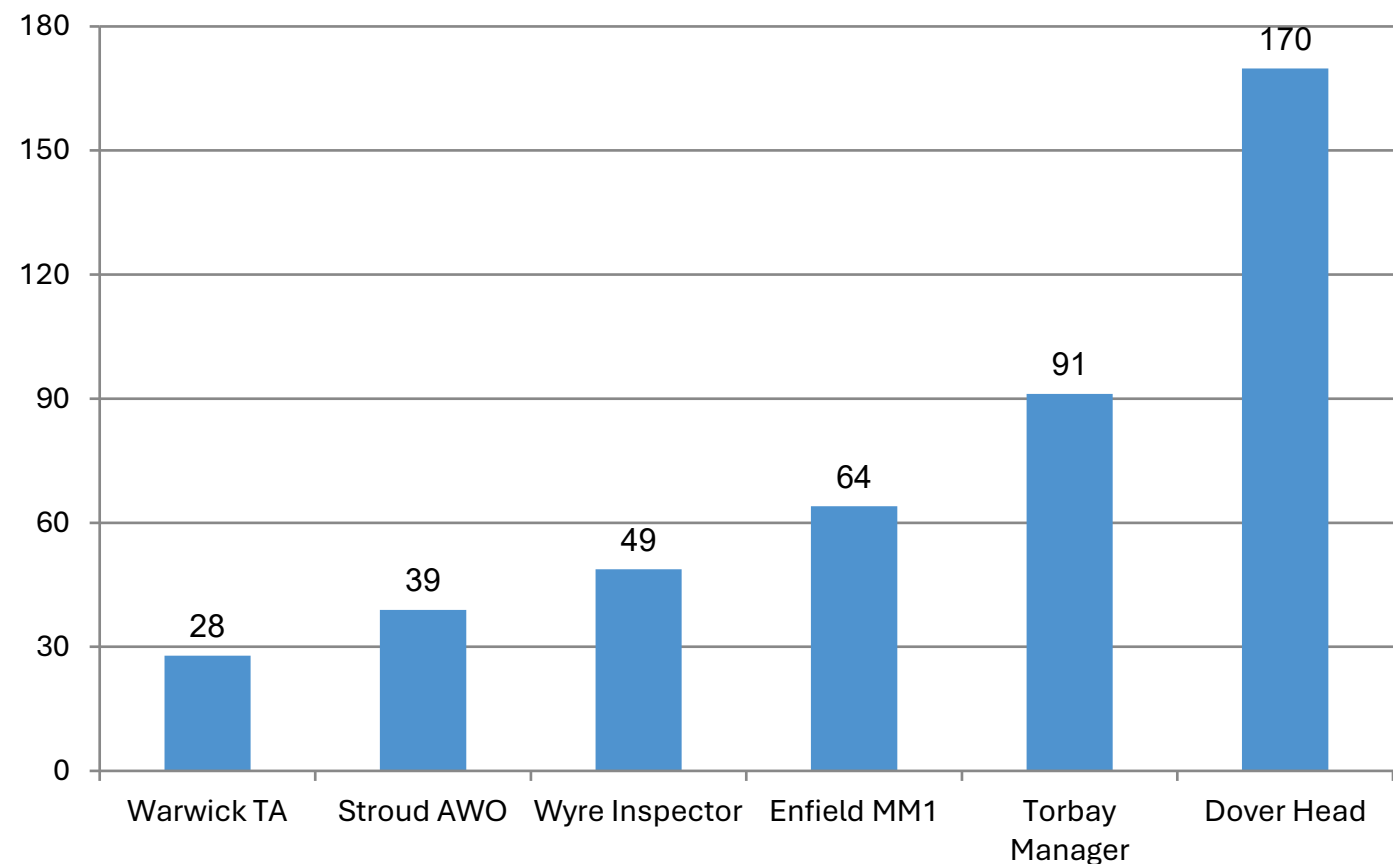
- Detailed activity models in some authorities.
- Narrative explanations in others.
- Some hourly rates withheld or not disclosed.
- Different treatment of complaint work, compliance, unlicensed enforcement and deficits.
- Transparency is uneven even where full cost recovery is asserted.



■ Substantive ■ Partial or inadequate ■ Acknowledgement only

Officer rates and cost components differ materially

Variation is not automatically improper, but it must be capable of explanation



Known disclosed rates range from about £28 per hour to nearly £170 per hour.

- Some include on-costs and overheads.
- Some disclose rates by grade.
- Some use blended rates.
- Some do not disclose rates at all.

Surpluses, deficits and annual reconciliation

This is likely to be the most sensitive fee-setting issue

Examples identified in the FOI evidence

Authority	Position
Warwick	FOI says no deficit, but model adds sums to reduce accrued deficits.
Stroud	Acknowledges under-recovery and staged fee increases.
Braintree	Reports 2024/25 deficit and increases intended to reduce it.
Wyre	Currently in deficit and fee increase intended to address it.
Torbay	States no surplus or deficit arises from the costing model.

The LGA position is not that deficits can never be recovered.

- Fees should be broadly cost neutral over time.
- Surpluses should reduce future fees.
- Deficits may be recovered, but proportionately.
- The calculation and recovery period should be visible.

A useful example: Wyre Council

Detailed activity costing makes the fee auditable, even where there is a deficit

ing / Dog creche	Officer	Mins	£/min	Costs
applicants + email issue application pack or refer applicant to we	LA	15	£0.65	£9.75
e and check application form / Fee	LA	10	£0.65	£6.50
pection work, incl review app docs	IMF	35	£0.87	£30.28
pplication inspection incl travel time	IMF	240	£0.87	£207.60
pection work, incl review previous compliance level & RR	IMF	35	£0.87	£30.28
Application inspection incl travel time	IMF	180	£0.87	£155.70
tion form print and paper				£1.50
spection work incl risk matrix	IMF	45	£0.87	£38.93
ve or refuse decision and issue letter	IMF	60	£0.87	£51.90
outstanding fee / Take payment and issue receipt	LA	10	£0.65	£6.50
to IDOX	LA	20	£0.65	£13.00
post licence to applicant	LA	5	£0.65	£3.25
rk / document management	LA	10	£0.65	£6.50
ig compliance work inc unannounced inspection	IMF	120	£0.87	£103.80
dures/guidance/fee setting/Stat returns/website	SLO	60	£0.92	£55.20
e management costs	Man	1	£1.14	£1.14
manageable recharges				£4.00
ing / Dog creche				£164.14

ation Fee			£346
year fee		£539.84	£540
year fee - double management costs	£164.14	£703.98	£704
year fee - treble management costs	£328.28	£868.12	£868
r 1 year fee		£487.94	£488
r 2 year fee - double management costs	£164.14	£652.08	£652
r 3 year fee - treble management costs	£328.28	£816.22	£816

applicant on re-rating process	LA	15	£0.65	£9.75
pection work, incl review previous compliance level and RR	IMF	25	£0.87	£21.63
ing inspection (to include travel)	IMF	150	£0.87	£129.75
tion form print and paper				£1.50
spection work incl risk matrix	IMF	20	£0.87	£17.30
n ldox & re-issue Licence with new rating	LA	25	£0.65	£16.25
a & letter print (including paper) / postage				£2.80

				£198.98
ing fee				£199

nal inspection time (set to max 3 hours) / determination	IMF	180	£0.87	£155.70
nal admin time	LA	15	£0.65	£9.75

r adding as additional activity				£165
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27 income	5			£3,260
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Staffing costs	Key	£/min
FS & Lic Manager	Man	1.14
SLO	SLO	0.92
Licensing Specialist	CO	0.81
Lic Admin		0.66
Lic Asst		0.64
Average admin cost LAO+LA/2	LA	0.65
Average officer cost	IMF	0.865

What the model shows

Task-by-task minutes for each licence activity.

Officer grades and per-minute rates.

Application administration and inspection time.

Ongoing compliance and unannounced visits.

Procedures, guidance, complaints, fee setting and statutory returns.

Veterinary fees separate where required.

Good transparency does not remove scrutiny.
It makes scrutiny possible.

What good practice should look like

A practical checklist for authorities and industry

#	Good practice test
1	Separate application and ongoing elements.
2	Use evidence-based officer time assumptions.
3	Disclose hourly rates and what on-costs include.
4	Identify enforcement and complaint costs separately.
5	Charge veterinary costs consistently and transparently.
6	Reconcile income and expenditure annually.
7	Carry surpluses and deficits within the animal licensing regime.
8	Publish enough information for businesses to understand the fee.

PIF recommendations

A consistent national approach without imposing a single national fee

1. Defra should publish a standard animal licensing fee-setting template.
2. Authorities should publish the main assumptions behind their fees.
3. Application, compliance and enforcement costs should be separately identifiable.
4. Annual income and expenditure reconciliation should be expected.
5. Historic surpluses and deficits should be transparent and ring-fenced to the regime.
6. Defra should make better use of the annual fee data it already collects.

This would protect both sides.

Businesses would understand the fees.

Councils would have a clearer and more defensible basis for charging.

Consistency in method, not uniformity of price.

Final Thoughts

Three questions for discussion

- 1 What information would make national returns more reliable?**
- 2 What is the minimum fee-setting information a council can reasonably publish?**
- 3 How can industry and local authorities improve compliance without increasing avoidable cost?**



Contact: info@petfederation.co.uk

Pets for sale online in the East Midlands

9.5%

of all online pet adverts in England are here.

44%

of adverts are for dogs. **30%** are for cats.

15%

are small pets, like rabbits and guinea pigs. England is 12%.

Watch for these cats: Scottish Fold and Sphynx. They are 1.4 times more common here than in England. Both breeds have welfare concerns.

Warning signs to check

29

adverts offer puppies or kittens **under 8 weeks old** as "ready now". One kitten was 7 days old.

18

out of 33 adverts for protected (CITES Annex A) animals **do not mention** an Article 10 certificate.

15

dog adverts show a "Licensed Breeder" badge, but the website had **rejected the licence**.

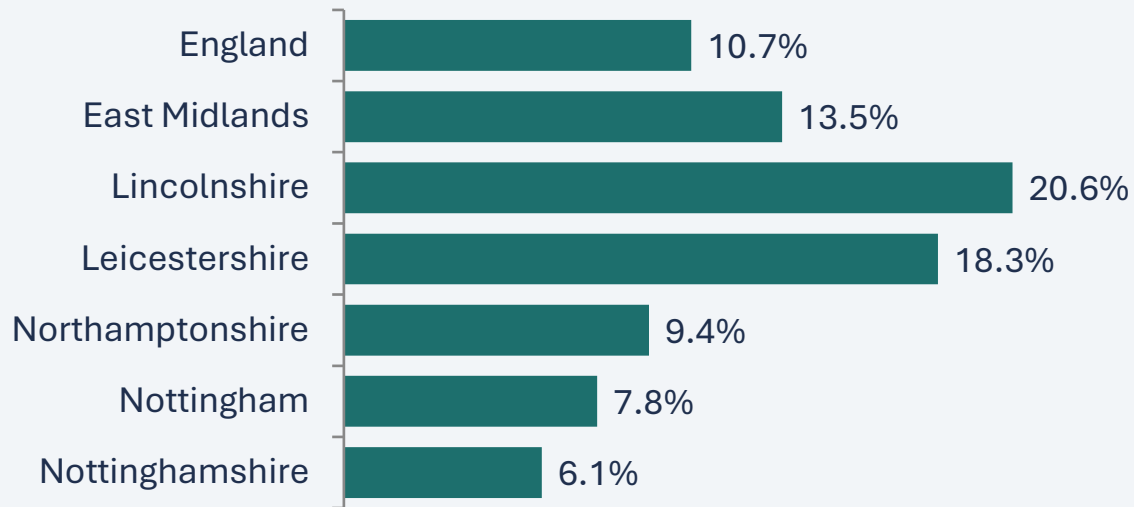
13

puppy or kitten adverts say the seller is **selling for someone else**, like a friend or relative.

These are signs, not proof. Always check the facts before you act.

Reading the numbers with care

Dog adverts with a licence shown



The data cannot see:

- Facebook Marketplace, probably the biggest place pets are sold.
- Photos, so things like cropped ears are missed.
- Dealers who do not say they are dealers.

A licence on show does not mean a seller is legal. Many sellers do not need one.

Download Festival

NWLDC

Andy Cooper – Public Protection Team Manager

Tonya Cooper – Licensing Team Leader

Laksmi Kerrison – Environmental Health Team Leader

Claire Howard – Environmental Health Officer



Download Festival: History



- It is the United Kingdom's largest festival dedicated to rock and metal with more than 100 bands playing on several stages. The site covers around 900 acres.
- Download was created by Andy Copping as a successor to Monsters of Rock, which had been held at Donington until 1996.
- Download has hosted some of the biggest rock and metal bands, including Iron Maiden, Black Sabbath, Slipknot, Metallica, Linkin Park, Korn, Soundgarden, Motörhead, Aerosmith, AC/DC, Def Leppard, Five Finger Death Punch, Kiss, Judas Priest, Rammstein, Status Quo, Mötley Crüe, My Chemical Romance, ZZ Top, Whitesnake, Faith No More, Guns N' Roses and Fall Out Boy.

2025 & 2026 EVENT DETAILS

2025

Date: 11th - 16th June 2025

Headliners: Green Day, Sleep Token, and Korn

Campsites opened: 11th June, with 5-day ticket holders arriving 11th & 12th June

Arena: 13th - 15th June

Event Close: 16th June 12pm

Capacity: 75,000 (Licence for 120,000)

2026

Date: 10th to 15th June 2026

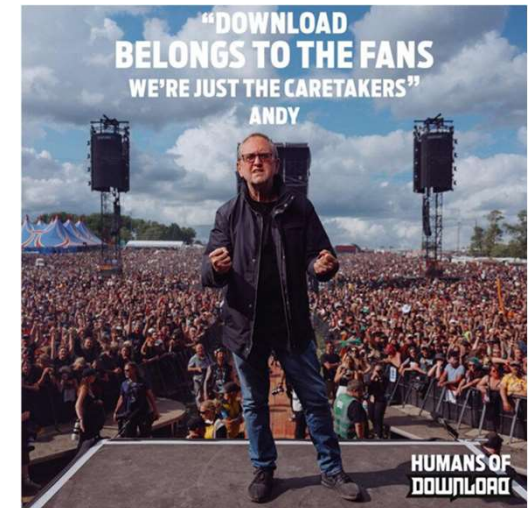
Headliners: Limp Bizkit, Guns N' Roses, Linkin Park

Campsites opened: 10th June, with 5-day ticket holders arriving 10th & 11th June

Arena: 12th - 14th June

Event Close: 15th June 12pm

Capacity: 95,000 (Licence for 120,000)



Download Festival: Attendance & Impact

- Attracted over 75,000 attendees in 2025 and 95,000 attendees in 2026 (Event licensed up to 120,000)
- Features world-renowned artists and multiple stages
- Boosts local economy and tourism in the region
- East Midlands Airport (EMA) is a significant hub for both passenger and cargo operations, acting as a key gateway for businesses in the region and beyond. It's known for its strong cargo business, particularly in express freight, and is located within the East Midlands Freeport area, fostering economic growth and attracting investment.



What does the local council do at a festival like Download?

- Issue the licence for Donington Park, allowing events like Download Festival to take place.
- Chair the Safety Advisory Group (SAG), bringing together event organisers and various agencies.
- Oversee food safety, water testing and hygiene inspections, working with on-site teams to ensure compliance.
- Live-monitor sound levels and campsite conditions.
- Inspect bars, taxi compliance and ensure licensing conditions are met during the event.

Licensing and Permissions

- Acts as the Licensing Authority for Donington Park

The premises licence was first issued in 2005 and has been subject to various changes and reviews throughout the years to include:

- Capacity increases from 59,999 to 120,000
- Reviews due to Traffic, Noise, Aerodrome Safeguarding, etc
- Unique being next to a Major Airport – also has its challenges
- Lots of conditions relating to Event Management Plans, Traffic Management, Aerodrome Safeguarding, Drones, Pyrotechnics, Radio Frequencies, etc

Year Round Planning

- Planning starts immediately after the previous festival.
- NWLDC Lead Officer chairs the SAG, bringing together event organisers, emergency services, health and safety bodies and local authorities.
- Monthly SAG meetings begin in January each year with subgroups for noise, health & safety, water safety, traffic, police and security where best practice is shared.
- Includes debriefs, joint planning sessions, site visits and tabletop exercises.
- Site build begins in May with multi-agency site visits.
- Unique considerations due to proximity to East Midlands Airport.

HIGHLIGHTS & CHALLENGES 2025

ADVERSE WEATHER:

Warm weather experienced throughout the weekend led to several operational challenges. These include:

Contingency Water Supply: Additional water stations were deployed.

Relaxation of Water Policy: The usual restrictions on the quantity of water allowed into the Arena were temporarily relaxed.

Enhanced Water Access: Water pressure increased through a boost in pump capacity reducing water bottle refill times.

ENVIRONMENTAL HEALTH:

Environmental Health sub-groups established to review plans and policies as additional requirements were set out for all food traders and catering units onsite, which were monitored during the event.

TRAFFIC:

Improvements include signage, communication around road closures, customer messaging channels and car park capacity.

Challenges faced included: Friday night egress delay due to medical emergency exiting car park along with an ongoing farmer dispute.

HIGHLIGHTS & CHALLENGES 2026



ADVERSE WEATHER:

Adverse wet weather, wind and lightning was forecast. Weather meetings were held to plan an appropriate response to adverse wind. Constraint monitoring on the Friday and Saturday of the show week in preparation for the wind speeds expected was undertaken.

ENVIRONMENTAL HEALTH:

- During the build of the festival it was found that the water pressure coming into hydrants on site was lower than forecasted. This required remedial work done by Site Management and Water Management teams and the utilisation of contingency tankering was successful.
- Potential food illness investigation process - it was felt that there should be more work done with the medics and the festivals environmental health officers to establish facts early and accurately as 3 cases were reported during the event.
- Sanitation, water and bin allocations for traders - Shortfalls in these areas were identified throughout the festival. The spec that is provided for the trader lines by the management team for these areas will be reviewed to ensure that there is appropriate allocation in place.

TRAFFIC:

To ensure the safety and speed of customers leaving the site, the Walton Hill junction was temporarily closed from 21:00 – 02:00 on Friday, Saturday and Sunday nights. This was proved to be effective and will likely be carried over into next years show.

Challenges:

- The one-way system on the airport road was needed to be put in place on the Friday of the event. This was put in place effectively and contributing to a reduction in the buildup of traffic surrounding the event site.
- A closure was implemented on the A453 as a result of a lorry caused by a medical emergency. This resulted in a prolonged period when the road was not open. However, this was successfully cleared before the next days ingress.
- Due to resurfacing works on the M1, lane closures were implemented overnight in both directions from Friday. These had a knock-on effect for the egress of day customers.

NOISE



The dedicated residents phone line was operational 24 hours during the festival. 2 calls were received in 2025 and 4 calls received in 2026 with regards to noise and were escalated to the Noise Management Team.

The dedicated external noise consultancy responded to 2 complaints in 2025 and 11 complaints in 2026 of noise and took readings at these addresses to check that there was no breach of licence conditions.

The resident inbox received 9 emails in 2025 and 11 emails in 2026 regarding noise.

NWLDC received 6 noise complaints over the event, which the details were passed to the Noise Management Team at the time.

	2024	2025	2026
Noise Complaints via phone line	11	2	4
Noise Complaints via Email	14	9	11

Download Festival 2025 Taxi Prices	
Melbourne	£18
Breedon on the Hill	£15
Castle Donington	£14
Diseworth	£16
Kingsmill Campsite	£15
Long Whatton	£17
East Midlands Airport and Hotels	£18
Belton	£19
Moto Travel Lodge	£19
Hilton Hotel J24	£23
Kegworth	£23
Best Western Hotel Yew Lodge	£23
Days Inn A50	£28
East Midlands Parkway	£31
Long Eaton	£31
Best Western J25	£36
Derby Station	£36
Derby City Centre	£36
Leicester City Centre	£56
Ashby de la Zouch	£36
Loughborough Town Centre	£35
Loughborough Station	£36
Coalville	£36
Burton on Trent	£45
Nottingham City Centre	£55
Birmingham Airport (Drop off fee to be paid by customer)	£86
Birmingham City Centre	£106
Manchester Airport (Drop off fee to be paid by customer)	£146
Heathrow Airport (Drop off fee to be paid by customer)	£245
London City Centre	£275
Gatwick Airport (Drop off fee to be paid by customer)	£320

These prices are for a single drop off point. Fares will increase with further drop off points.

The above prices are for 1 to 4 passengers. Prices may vary for journeys made by vehicles that can accommodate between 5 and 8 passengers.

Notes: If you have a complaint, please contact North West Leicestershire District Council on 01530 212121 or email licensing@nwleicestershire.gov.uk.

Only taxis and vehicles not licensed by North West Leicestershire District Council. complaints will be referred to the appropriate Council.

Taxi Compliance – 2026

Highlights

- A well-managed taxi rank, coordinated by two drivers and their support team.
- The Hackney carriage rank enabled permit holders to exit efficiently.
- Camera-equipped airport enforcement patrols around the airport and festival site deterred parking on double red lines, illegal plying for hire and Uber pick-ups outside the designated pick-up and drop-off (PUDO) area.

Challenges

- Uber drivers in the PUDO area unable to confirm bookings, raising concerns about plying for hire.
- Overcharging of vulnerable or intoxicated passengers leaving the festival.
- Hackney carriage drivers not licensed by NWLDC displaying illuminated roof signs.
- Drivers attempting to establish unauthorised taxi ranks at other site entrances.

When it goes wrong....

2022 - Drone Activity

Drone activity near the airport caused delays and while the festival organisers work with the airport to mitigate this, it remains a potential issue.

BBC News: [Drone pilot fined for flights near East Midlands Airport and Download Festival - BBC News](#)



When it goes wrong....



- **Incident:** Daniel Cesare filmed Download at Donington Park, next to East Midlands Airport and within its flight restriction zone. He also flew above the legal limit of 400ft (122m) and beyond visual line of sight.
- **Seven offences admitted:** two charges each for flying in a restricted zone without permission, exceeding the maximum height, and failing to keep the drone in sight; plus one charge for failing to display a registration number.
- **Further offences:** 13 other drone-related offences were taken into consideration when he was sentenced at South Derbyshire Magistrates' Court.
- **Sentence:** a £1,008 fine, reduced from £1,512 for his guilty plea, plus £85 costs and a £403 surcharge.

When it goes wrong....

Scale and causes: The festival ran for four days for the first time for its 20th anniversary, attracting more than 100,000 people. Organisers said the resulting traffic chaos was “not acceptable” and blamed several factors.

Traffic impact: Motorists queued for up to 13 hours, with major disruption on the M1, A42, A453 and A50. Festival-goers faced long waits and some East Midlands Airport passengers missed flights.

Accessibility: Disabled attendees reported difficulty reaching the disabled campsite and wider accessibility problems across the festival grounds.



When it goes wrong....

- **Investigation outcome:** The council found no breach of traffic-management or noise-control conditions, despite the severe congestion and the majority of complaints relating to those issues.
- **Licence review:** Because the Donington Park premises licence dates from 2005, the council advised that some conditions should be tightened.
- **Conditions added:** Following consultation, new requirements for community engagement and traffic-management plans were introduced to reduce impacts on nearby roads and communities.
- **Source:** Leicester Mercury.



Improvements since 2023

As a result of the Council receiving over 200 complaints in 2023, a minor variation application was submitted to strengthen licensing conditions and to ensure proactive engagement with the community.

These include:

- Liaison with parish councils, local residents and businesses
- Open communication channels for feedback and concerns
- Efforts to minimise disruption (e.g., noise, traffic)
- Resident letter drops and pop up communication hubs

Event Safety

- Food safety inspections, health and safety inspections, water testing, infectious disease monitoring, tattoo and special treatments inspections and hygiene checks.
- Compliance with legislation.
- Council officers from several teams are on the ground and in the event control centre.
- Live monitoring of sound levels.
- Campsite checks for sanitation, waterpoints, WC's and showers.
- Reactive work as required.
- Taxi enforcement.
- Daily all agency debriefs to review incidents and improve safety.



Post Festival Review

- Each agency submits feedback to organisers – good and bad
- Joint in-person debrief with all partners
- Findings shared with SAG group, agencies, District Council Members and parish councils
- Residents and Parish debrief meetings
- Lessons learned feed directly into next year's planning

Why This Work Matters

- Often overlooked but critical to festival success
- Not just enforcement – it's about enabling a safe, enjoyable event
- Builds public trust, strengthens community ties and enhances the district's reputation
- Inspires future talent by showcasing the impact of public service

Council Staff Experience

- Involves Licensing, Environmental Health and Protection and Communications teams
- Unique opportunity to work on the second largest festival in the UK (UK's largest rock and heavy metal festival)
- Promotes collaboration across departments and agencies
- A source of professional pride and personal achievement

Download Festival EIN Feature

- [exclusive feature in the event industry's leading press outlet – Event Industry News \(EIN\).](#)
- Our Comms team worked on this Q&A style feature, along with an extended video for exclusive use by EIN.
- Tasked by the Council's Strategy Group to raise the profile of our work to support the festival. This has been a great tick in that box, as it will be read by people working in the event industry, alongside a huge amount of other comms for different audiences.



Photo Highlights – Download Festival





Download Festival Video Feature



Thank You!

Any Questions?

North West Leicestershire District Council

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Laksmi Kerrison – laksmi.kerrison@nwleicestershire.gov.uk

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Effective regulatory compliance through partnership working

- A personal reflection

Darren Dolby

Senior Licensing Officer

South Kesteven District Council

darren.dolby@southkesteven.gov.uk



SOUTH
KESTEVEN
DISTRICT
COUNCIL

WHY DO WE NEED PARTNERSHIPS ?



Who are our partners ?

Regulatory Bodies – External

- Police Service
- Fire Service
- Health Authority
- Security Industry Authority
- Home Office Immigration
- Department for Work & Pensions



Internal Partners

- Environmental Health (Pollution control / Health & Safety / Food Safety)
- Trading Standards
- Planning Department
- Children's Services
- Legal Services
- Commercial Team
- Communications
- Neighbourhood Enforcement Teams



External Partners

- Regional LA Groups
- National Groups (Institute of Licensing)
- VOSA
- Business Improvement District Teams
- Licensed Premises Operators (LA03 & GA05)
- Hackney Carriage & Private Hire Groups
- Local Pubwatch Schemes
- BACTA (Amusement & low stake gambling association)
- FACT (Teamed with SKY TV to investigate illegal viewing)
- Housing Associations
- Local Residents Groups



CASE STUDIES

Licensing Act 2003

TAVAN RESTAURANT – Review of Premises Licence

- HM Immigration led review of a premises employing illegal worker
- Supporting documents from Police
- Review was requested under ‘crime & disorder’ objective



THE ZONE @ WILLOW CAFÉ – WORLD CUP 2026

- Multi agency working together with licensed premises
- Licensing Team, Police, Planning, EH - Pollution Control, Fire Service, SAG members
- Ensured that events at ‘The Zone’ took place without any major issues



Hackney Carriage & Private Hire Action Days

- Licensing, Police (RPT), VOSA & DWP

Test Purchasing – Alcohol, Tobacco, Spray Paint & Knives

- Trading Standards or Licensing led with support from Police

NTE Door Supervisor checks

- SIA led with support from Licensing & Police

‘General’ Problem Solving – A Partnership Solution

- Licensed premises in the south of Peterborough
- Issues with Travellers & inadequate management at premises
- Licensing, Police & Premises Licence Holders found solution





Hot tubs and spa pools at UK Festivals

What EH can do to battle growing trends

East Midlands 5+1 CPD – 1st October 2026

Nathan Matthews – Halton Borough Council

Overview

1. Background
2. The role of SAGs
3. SAGs – The Risks
4. Modes of intervention
5. Concluding remarks

Background

- Changing times & tides
- Sector pressures



The Guardian UK

News Opinion Sport Culture Lifestyle

Business Economics Banking Money Markets Project Syndicate

Festivals

This article is more than 2 months old

Hot tubs and £80 rosé: how the mud-soaked British festival got a luxury makeover

Struggling industry seeks to capitalise on Gen Z's willingness to spend on experiences and comfort

Safety Advisory Groups (SAGs)

- Generalist or event specific
- Collaboration of various internal and external stakeholders
- Working with event organisers
- Providing professional advice and guidance
- Aid the focus of attention and direction



[Home](#) > [Industries](#) > [Event safety](#)

Safety Advisory Group (SAG)

Introduction

SAGs are usually co-ordinated by a Local Authority (LA) and made up of representatives from the LA, emergency services, other relevant bodies and the event organiser. They may be event or location specific but otherwise tend to be based on LA boundaries.

A screenshot of the Halton Borough Council Event Notification form. The form is titled 'Event Notification form' and includes a link to 'Event Notification Guidance'. It contains several input fields: 'Name of event:', 'Type of event:', 'Date of event:', and 'Nature of Event:'. The 'Date of event:' field has a calendar icon. The form is set against a light blue background with a dark blue header bar displaying the Halton Borough Council logo.

Why effective SAGs are paramount

Model Risk Assessment		
What are the hazards?	Who might be harmed?	How might they be harmed?
BURNING FROM FIRE DOOR OVERLY HOT WATER BURN FROM CHIMNEY	Team Members	BURNS
	Customers	
	Children	
	Contractors	
	Visitors	
	Others	
	All of the above	

DAILY DANNER

5AM - CHECK TUBS AND WGT FIRES
6AM + SAUNA 2HRS TO HEAT TO 40 DEGREES

8AM - 7.50PM - SITE OPEN AND MANNED.

8PM - EMPTY HOT TUBS 2HRS 20mins
CLEAN AND SANITIZE HOT TUBS
REFILL HOT TUBS - FRESH WATER
CLEAN SAUNA CUP

11PM WOCK UP - FINISHED.

Summer
2025



Please find below the requested details, in line with the **HSG282 guidance**:

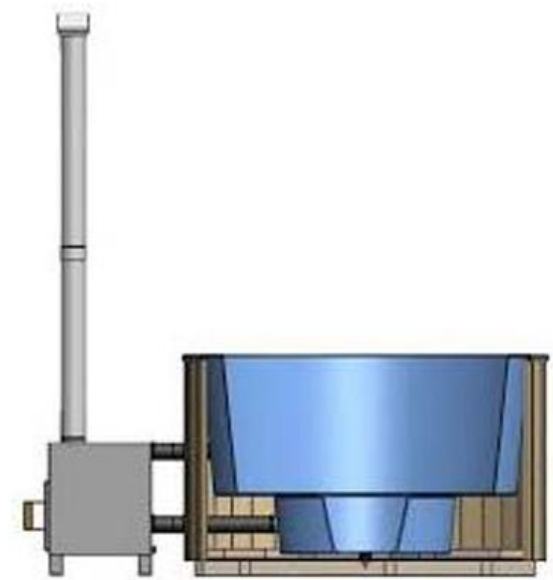
1. Biocidal Regime and Water Quality Monitoring Plan

Each tub will be treated and monitored in accordance with HSG282 and industry best practice, as outlined below:

- **Disinfection Method:** We use chlorine-based disinfection in accordance with HSG282 recommendations.
- **Initial Treatment:** Prior to the start of the event, all **tubs** will be filled with fresh mains water and dosed with an appropriate level of chlorine shock treatment to raise the free chlorine to >5mg/l for commissioning purposes.

Summer 2026 – different trader, reoccurring non-compliances

- Event presented more proactive approach
- New trader selected
- Similar business model
- Minimal trader knowledge and awareness
- Cold Plunges



TECHNICAL NOTE

71 – ICE BATHS

8 August 2024

Cold water immersion is popular for the rehabilitation of muscles and other soft tissue after exercise, with evidence cited for reducing inflammation and helping with mood and sleep. This can be achieved in open water, but increasingly there are lots of baths and other vessels being used to achieve the same result.

This technical note reviews the health aspects as well as water quality considerations. The emphasis here is on commercial operations; domestic users should follow these guidelines as closely as they can.

The health risks

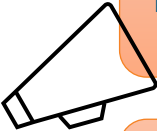
There are multiple risks for those whose thermoregulatory systems operate sub-optimally, such as the elderly or immunosuppressed. The risks are related to sudden increased heart rate caused by changes to blood pressure. This can cause cardiac and respiratory stress and reduced neural conductivity; and in turn cardiac failure and respiratory shock.

Spotlight on Intervention

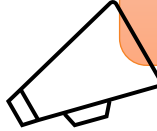
- Early engagement beneficial
- Liaise with event organisers
- Understand the proposed plan for operation
- Request risk assessments and management plans
- Construct evidence base

The spa pass ... wood-fired hot tubs ... new for 2026!

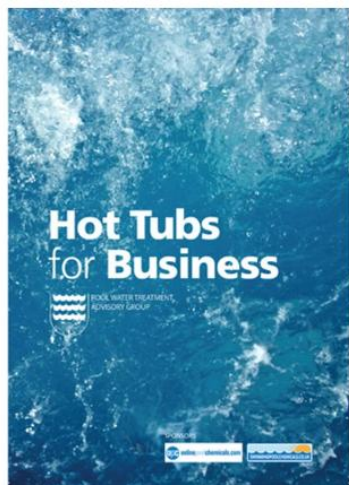
You will be greeted by our spa staff with a glass of non-alcoholic welcome fizz, then it's time for a refreshing cool shower, recharge in the wood-fired hot tubs and cold dip and relax on the comfortable seating and cosy fire pit and browse our spa store with dry robes, swim shorts and eco-friendly essentials such as hand sanitizer, after-sun, deodorant and hand and body soap. You can also take advantage of our get ready area with mirrors, dressing table, chairs, hairdryers and tools.



Health and Safety at Work etc. Act 1974 – Sec 2&3



The Management of Health and Safety at Work Regulations 1999, Regulation 3



The control of legionella and other infectious agents in spa-pool systems

References and further reading

- Access All Areas (2025) – UK Festival Map Illustrates Sharp Decline in Number <https://accessaa.co.uk/uk-festival-map-illustrates-sharp-decline-in-number/>
- Argyll & Bute Council (2024) – Scandinavian Hot Tubs – <https://www.argyll-bute.gov.uk/sites/default/files/2024-04/Scandinavian%20spas%20-%20advice%20for%20commercial%20operators%20-%20January%202024.pdf>
- HSE (2017) HSG 282 Control of legionella and other infectious agents in spa-pool systems - <https://www.hse.gov.uk/pubns/books/hsg282.htm>
- HSE (n.d.) Safety Advisory Group (SAG) - <https://www.hse.gov.uk/event-safety/safety-advisory-groups.htm>
- National Collaborating Centre for Environmental Health Canada (NCCEH) (2024) – Cold plunge tanks: Considerations for environmental public health <https://ncceh.ca/resources/evidence-briefs/cold-plunge-tanks-considerations-environmental-public-health>
- PWTAG (2018) Hot Tubs For Business - <https://shop.swimming.org/pwttag-hot-tubs-for-business/>
- PWTAG (2024) Ice Baths Technical Note - <https://www.pwttag.org/ice-baths-tn71/>
- The Guardian (2026) - Hot tubs and £80 rosé: how the mud-soaked British festival got a luxury makeover <https://www.theguardian.com/culture/2026/jul/17/great-british-festival-industry-luxury-makeover-gen-z>

Concluding Remarks

- Emerging and developing trend – goodbye for now, not forever
- Substandard risk appreciation
- SAGs an opportunity for preparedness
- Resource constraints hinder awareness of presence at festivals
- Insufficient equipment available on commercial market currently
- Any questions?



Looking ahead:
General H&S working group for festivals (virtual meetings)

If interested or any questions, please email: Nathan.Matthews@halton.gov.uk

Mobile Pools

How Safety Advisory Groups can Highlight Potential Public Health issues at Events; Hot Tubs, Spa Pools and Ice Baths

East Midlands 5+1

1st October 2026

Rob Johnston

UKHSA Food, Water and Environmental Microbiology Laboratories

- Overview of some licensing relating to massage and special treatment – spa pools in licensed premises
- HSE guidance and priorities for spa pools and reviewing pool water management
- Guidance from the Pool Water Treatment Advisory Group, PWTAG, on managing pool waters
- Challenges with hot tubs
- XR47 UKHSA FW&E and LA Cross Regional Survey on Spa Pools and Hot Tubs
- **Hot tubs at events**

Nottinghamshire County Council Act 1985

- New provisions for the improvement, health and local government of the county

Included –

- Urgent repair to walls and to water, gas or electricity apparatus
- Defective electrical installations in houses
- Touting, hawking, photographing etc
- Computer evidence for certain offences
- The clearing of the waterways of Gunthorpe Bridge (for those who know Nottinghamshire)

AND

Licensing requirements of persons carrying out establishments

Nottinghamshire County Council Act 1985

- No person shall carry on an establishment for massage or special treatment in the district without a licence
- The licence can be renewed but runs for not more than 13 months
- Details of the premises and the applicant and the applicants' qualifications for carrying on of the business
- Any other such relevant and reasonable information as the authority requests

And the applicant would 'pay such a reasonable fee to cover the expense of the district council in dealing with such applications

Nottinghamshire County Council Act 1985

There are a number of treatments licensed under the Nottinghamshire County Council Act 1985.

The term 'establishment for massage or special treatment' means any premises used for or represented as being intended to be used for the reception or treatment of persons requiring:

- i. massage or
- ii. electric treatment of radiant heat, light (including sunbeds), electric vapour or sauna or other baths for therapeutic treatment; or
- iii. other similar treatment

But this licensing regime and requirement isn't national;

London Local Authorities Act 1991 and the Worcester City Council Act 1985

Setting Local Authority Priorities and Targeting Interventions LAC 67/2 2026/27 – 2029/3

Setting priorities and targeting interventions - HSE and LAs Working together – HSE

Legionella and spa pools and hot tubs in the holiday sector

- There has been a number of cases of Legionnaires' disease associated with spa pools and hot tubs in the holiday rental sector.
- 'Whilst some of the larger organisations are likely to manage the risk well, smaller companies may not have the same level of awareness of the risks and the requirements to manage those risks.
- LAs should raise awareness of the risks of spa pools and hot tubs and promote careful management to ensure that water quality does not encourage microbial growth and pose risks to service users or people in the vicinity of the spa pools or hot tubs.

Systems should be managed in accordance with L8 Approved Code of Practice' and HSG 282, the Control of legionella and other infectious agents in spa-pool systems

Pool Water Advice and Guidance; Pool Water Treatment Advisory Group Three key parts to PWTAG Guidance

Swimming Pool Water the book!



PWTAG Code of Practice;

- a structured plan for the technical operation of their pool.
- provides a model of operation based on the authority of PWTAG good practice.
- gives an assurance that the pool meets essential pool operational standards.

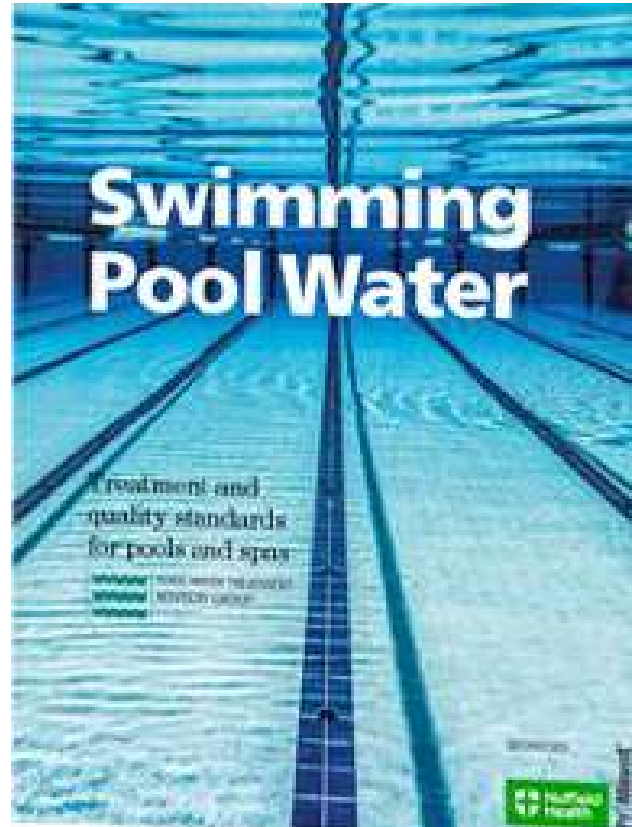
Technical Notes;

- Updates or new material for the standards and guidance given in the PWTAG book, Swimming Pool Water and the PWTAG Code of practice
- To be read in association with the other publications.

https://www.pwtag.org.uk/technical_notes/



Pool Water Advice and Guidance; PWTAG

[illegible]

PWTAG Annual Conference, Holywell Park, Loughborough, 5th November 2026

pwtag.org/download/pwtag-conference-2026-programme/?wpdmdl=6009&refresh=6a96a6343fd6f1788257844

UKHSA FW&E York Cross Regional Survey XR47 Spa Pools and Hot Tubs May 2026 – October 2026

- Survey running for 6 months

LAs are encouraged to sample after the end of October

- Water samples – 1 litre for Legionella and 500ml for indicators
- Swab – of a key surface such as a lid/inflatable
- Premises – any with a spa pool or hot tub including those on display in retail, leisure, health clubs and holiday settings etc
- Over 100 premises/pools visited
- More than 300 samples taken to date with >120 samples out of specification – ie borderline/unsatisfactory sample results

Scandinavian style hot tubs – a bacterial soup !



Photo thanks to Toby Thorpe, City of London.



Source water for Scandinavian hot tubs (and any pools) should be considered as part of the risk assessment and part of the NOPs/EAPs



UK Health
Security
Agency

Thanks
UKHSA FW&E colleagues and LA's