



Discussion Paper

To: Licensing Committee

From: Kerry Simpkin, Licensing Team Manager, Public Protection & Licensing

RE: Licensing News and Cost Effective Resident/Business Communications.

Office Location: 4th Floor, Westminster City Hall

Date: 21st November 2016

1. Introduction

- 1.1 The Licensing Service has undertaken a review of how it communicates with the public and licensees relating to licensing applications and information. As part of this review there are some key considerations that have been considered by officers. These considerations were:
 - 1.1.1 Why do we provide the communication?
 - 1.1.2 Who is the intended audience?
 - 1.1.3 Does the content meet the needs of that audience?
 - 1.1.4 Does it provide a cost effective means of communicating the information?
- 1.2 The Licensing Service has identified some key areas that warrant discussion on whether they are pitched at the right audience, provide the right information or be poor value for money.
- 1.3 Officers have met with the Cabinet Member for Public Protection and Licensing/Licensing Committee Chairman. As part of those discussions it was proposed to provide a discussion paper for debate and discussion at the next Licensing Committee. The purpose of the discussion paper will enable the Licensing Committee to express their views in relation to how the Licensing Service communicates with Councillors, residents and businesses and what those communications should contain to make them useful for those receiving them.
- 1.4 This discussion paper raises some key questions on who the Licensing Service should communicate with, what form that communication should be in and what information should be provided. The discussion paper also identifies some possible options using social media and more cost effective electronic communications that the current paper based consultation and communication methods used.

2. Background

- 2.1 There are several ways that the Council communicates with Councillors, residents and businesses. There are direct communications, such as consultation letters to local people when an application has been made and indirect communications such as Licensing News and lamppost notices.

Direct Communications

- 2.2 The Council has for many years, before the introduction of the Licensing Act 2003 sent letters to local resident and business addresses when an application, which allows public consultation has been received. Officers will select residential properties within a certain distance of the premises for which the application has been made for. The letter will contain basic information about the application and set out the last date for making an objection/representation and how it may be lodged (see Appendix 1 for an example of this letter).

Indirect Communication

- 2.3 Licensing News has been sent out in many different guises for many years. The purpose of this document has to inform Councillors, residents and business that have signed up to receive this document of the applications that have been received that week and decisions that have been made.
- 2.4 The Council also produce and place a notice on a lamppost near premises when an application, which allows for public consultation, has been received. The lamppost notice provides basic information on the application; the last date for making an objection and how to contact the Council (see Appendix 2 for an example of a lamppost notice).

3. Licensing News

- 3.1 Licensing News is a key document that is sent out by the Licensing Service every week. There have recently been some significant issues with the production of this document due to IT issues which have now been rectified however the format is not ideal and needs refining. The Licensing Service also carried out a consultation exercise on the future of Licensing News earlier this year.
- 3.2 The responses from the consultation on the future of Licensing News showed that it is something that those who receive it use and find necessary to see what applications are being made. Local resident associations via the recent consultation on Licensing News stated that they did not have the time or resources to walk around their area and find blue notices. The key element of Licensing News that the respondents felt was essential was the list of applications received and when any consultation period would end. A number of solicitors do receive Licensing News and they track the decisions that have been made. There was little to no appetite for the recipient to pay for receiving Licensing News and all respondents didn't feel that the Council should stop sending out this document.

Questions for discussion

- 3.3 Having regard to the key considerations referred to in 1.1 above the Licensing Service seek the Committees views on Licensing News and its contents relating to the following questions.

Question 1: Who should Licensing News be focused at?

Licensing News is currently available to anyone who request to be on the distribution list. Licensing Solicitors use Licensing News to monitor decisions and applications that are being made they may affect their clients. Amenity and residents societies use it to monitor the applications that come in for their area so they can consider whether to make a representation or not.

Question 2: Should Licensing News focus on applications that have received that have a consultation period only?

At present Licensing News, in addition to the applications that are received that week that are in public consultation also contains a list of Temporary Event Notices that have been received, other applications that have been received, decisions that have been made at Licensing Sub-Committee and the licences that the service has granted that week. The list of applications received that are open for comment was the main element raised by Councillors, residents and amenity societies as essential in the recent consultation exercise.

Question 3: When should Licensing News be published, weekly or fortnightly?

At present Licensing News is published every week. Is that a reasonable time frame for this publication or should it be provided fortnightly?

Question 4: What format should Licensing News take?

Should Licensing News be produced to in any particular way layout or design? For example should it be produced by Ward or area? At present Licensing News does not breakdown the information into areas or wards. There have been some suggestions that separation into wards would assist Councillors in highlighting the applications that may impact their constituents.

Question 5: Should Licensing News be posted online only and not sent as an email?

Licensing News is currently sent out via email to those who request to be added to the distribution list. By sending this document out to only those who request it can be restrictive in how the information is distributed. There is also an issue with maintaining the distribution list with adding and removing email addresses. Should Licensing News be posted on the Council's website on a specific day and those who want to review the document can do so by visiting the relevant webpage?

Question 6: Are there any other view or examples of similar communications that the Licensing Service should consider?

4. Consultation Letters

- 4.1 The Licensing Service send out thousands of letters to local residents and businesses every year advising residents on applications that have a public consultation period. There is an estimated cost of £30,000 for printing, paper, envelopes and postage to the Council not included the time and resources required to produce these letters.
- 4.2 Consultation letters were introduced a number of years before the introduction of the Licensing Act 2003 when the Council could set its own fee to recover its full costs. However, with the statutorily set fees the Council incurs a deficit every year for the Licensing Act 2003 regime. Although the Council continues to lobby the government on being able to set its own local fees there remains the need to reduce the deficit by reducing costs when it can be more effectively carried out through more cost effective means.
- 4.3 The Licensing Service receives a large volume of the consultation letters back every month as unopened return to sender. Also for some areas, like the West End some residents may now consider the numerous letters that they receive as unwanted mail.
- 4.4 The Licensing Service will be moving out of City Hall to Portland House in March 2017 as part of the City Hall decant to enable its refurbishment. The Council, as part of this decant have been considering how we send out post and how that service will be provided from Portland House. Consultation letters has been identified as a large volume postal function that will need to be included within any service agreement for post if it is to continue.
- 4.5 In assessing the value of these letters going forward the Licensing Service has considered the cost and benefits for these letters and have come to the conclusion that the cost and resource implication does not show an equal benefit in resident responses to applications.
- 4.6 The Licensing Service believes that there may be alternative options available that are more cost effective and may produce greater benefits for local people.
- 4.7 If the Council were to stop producing consultation letters, which are not a statutory requirement then the Council could use Licensing News and the Council's own public register of applications as the key point of information. The Licensing Service could undertake a communications programme in conjunction with the Council's Communications Team to direct residents and businesses to these facilities to enable them to monitor applications.
- 4.8 The Council's public register currently allows a user to register and set a search parameter to enable them to receive emails relating to applications that have been made in their local area. The email notification then allows the recipient the ability

to view the documents that are provided as part of the application online and then directly make an online representation/objection to the Council.

- 4.9 The Licensing Service is keen to use social media as a means to communicate with residents, businesses and its licensees. There are examples of social media use around the country, for example Birmingham City Council regularly tweets information about licensing matters, including hearings and key decisions. Other Local Authorities, such as the City of London use email notifications to those who sign up to that service which will inform residents when applications have been received. The Licensing Service will seek views and advice from the council's Communications team in this respect with the aim of using innovation and technology to enable real time access to key licensing information, application details, and the ability to comment online, driving smarter engagement amongst resident and business communities.
- 4.10 Although there would be some residents that do not have access to the internet this number has been diminishing. For the limited number of residents that do not have access to the internet the costs involved in producing the consultation letters does not seem to be value for money over other online alternatives. Applicants are still required to publish a notice on the premises and in the local newspaper which is that statutory means for public consultation.

Question 7: What are your views on the suggestion that the Licensing Service cease producing consultation letters to local residents?

If the Licensing Service were to cease sending out consultation letters that decision would be subject to the implementation of a communications programme and other online methods to communicate with residents about applications within their area?

Question 8: What are your views on using social media to communicate with local residents, businesses and licensees?

Question 9: How can the Licensing Service better engage with local residents to register to receive email notifications about applications that have been made in their area?

Question 10: Are there any other ways that the Licensing Service can communicate and engage with residents about applications that the Council has received?

5. Lamppost Notices

- 5.1 Like consultation letters lamp post notices are produced when an application, which has a public consultation period, has been received. These notices are placed on a lamppost close to the premises to which the application relates. These notices are orange in colour and are secured in Westminster branded brackets.

- 5.2 The cost involved with placing these notices are approximately £6000 to £8000 a year. There is little evidence that these notices provide any significant return for the cost and time taken in putting these notices up. The information that can be placed on the lamppost notice is limited due to the size of the notice and the systems that are used to produce it. The lamppost notice, an example of which is attached at Appendix 2 contains less information than the statutory notice that the applicant must display on the premises.
- 5.3 With the use of social media and a communications plan to inform and encourage residents to use Licensing News, Twitter and the Council's Licensing Register it is believed that there would be little merit in maintaining the lamppost notices considering the cost and potential return.

Question 11: Do you have any views on the lamppost notices and why they should be retained?

6. Communication Strategy

- 6.1 There is a clear need to ensure that local residents and businesses are informed of applications that may impact on their private life or the operation of their business. It is the Licensing Services view that the current use of consultation letters and lamppost notices are outdated and are not cost effective. The Council has a digital program and there is a desire to move towards paperless operations.
- 6.2 If a decision is made to cease any of these communication methods then there will be a need to ensure that residents are kept informed above the statutory requirements placed on applicants. A communications strategy will need to be developed to ensure that if there is a transition from letters and lamppost notices then the Council can provide an easy alternative to receive notification of applications within the resident or business owner's local area.

Question 12: What do you believe should be included in a communications strategy to promote self-service by residents and the use of social media and online information on licence applications?

Question 13: Are there any views on alternative options to communication that has not been referred to in this paper?

7. Decisions

- 7.1 Following this meeting the Licensing Service and Cabinet Member of Public Protection and Licensing /Licensing Committee Chairman will discuss the views for the Committee. A Cabinet Member Report will be produced with a final proposal on the approach that the Licensing Service will have relating to communicating with Councillors, residents, businesses and licensees.
- 7.2 The decision on Licensing News, the consultation letters and lamppost notices will be communicated with members of the Licensing Committee. If there are any significant decisions to cease the way we currently communicate or switch to a more cost effective way of communication then the details of how that will be

implemented, along with any communications plan will also be shared with members.

Appendices

Appendix 1 – Example of a resident consultation letter

Appendix 2 – Example of a Lamppost Notice

If there are any questions relating to this briefing note then please contact Mr Kerry Simpkin, Licensing Team Manager on 020 7641 1840 or email ksimpkin@westminster.gov.uk



City of Westminster

Licensing Team
Public Protection & Licensing

Tel: 020 7641 6500

Owner/Occupier

«Address»

licence-reps@westminster.gov.uk

Date: 23 November 2016

Application Ref: 16/12735/LIPN

Dear Sir/Madam

NOTIFICATION OF A NEW PREMISES LICENCE APPLICATION UNDER THE LICENSING ACT 2003

Applicant: Select Service Partner Ltd

Location: Leon, Paddington Station, Praed Street, London.

Westminster City Council, as the Licensing Authority, has received the above licensing application. Members of the public may inspect copies of the application, plans and other supporting documents online. To view these documents members of the public should visit the Licensing Authority's application register at <https://www.westminster.gov.uk/comment-on-a-licence-application> and then click on the 'search applications' button. A new window will appear and the application reference should then be entered into the search field.

Anyone wishing to make representations about this application should do so on-line via the 'make a comment' button on the application page within the application register, or via email to the address given above, quoting the application reference **16/12735/LIPN** by the **19 December 2016**.

If you need free advice or support in making a representation you can contact the Westminster Licensing Advice Service, provided by the Citizen's Advice Bureau by calling 020 7706 6029 or via email to licensing@westminstercab.org.uk.

Please note: any representation that is anonymous or is received after the statutory consultation period will not be considered. All written representations received from the public about an application will be open to public inspection, including being made available on the Council's website. All representations received in relation to this application will be forwarded to the applicant.

Yours faithfully

Licensing Team Manager
Public Protection & Licensing

In partnership with



Scan to visit

www.westminster.gov.uk/licensing



NOTICE OF APPLICATION

Application for a New Premises Licence

Applicant:

Duck And Dry (London) Limited

Premises address:

Duck And Dry
28 Market Place, London, W1W 8AP

Application reference:

16/12535/LIPN

To view this application and its supporting documents please visit <http://idoxpa.westminster.gov.uk/online-applications/> and then click on the 'search applications' button. A new window will appear and the application reference should then be entered into the search field.

Anyone wishing to make a representation to this application can either do so online via the 'make a comment' button (once the application has been searched on the Council's online licensing register via the link above). Representations can also be made via email to premiseslicensing@westminster.gov.uk or in writing sent to the address below:

Licensing Team
Westminster City Council
4th Floor East
64 Victoria Street
London SW1E 6QP

The last date for representations to be received by the Licensing Authority is:

13 December 2016

For further information and advice on making representations and the grounds on which representations can be made please visit www.westminster.gov.uk/licensing. You can also call the Licensing Team on 020 7641 6500 or email premiseslicensing@westminster.gov.uk