



Response of Newsquest Media Group to the Home Office alcohol strategy consultation 2013: licensing notices

Newsquest Media Group is a publisher of 200 daily and weekly local newspapers and magazines and 160 associated websites across the UK. We make the following submissions by way of contribution to the Home Office consultation on alcohol strategy. In particular these submissions urge the rejection of any proposal to remove the existing statutory requirement on alcohol licence applicants to advertise their applications in a local newspaper. While at the same time needlessly jeopardising further the viability of small publications, the proposal conflicts with the stated objective of the strategy, which is the protection of the public and the quality of life in the communities in which we all live and which our newspapers serve.

1. The 2003 Licensing Act declares (at section 4(2)) that the objectives of licensing are: a) the prevention of crime and disorder; b) public safety; c) the prevention of public nuisance; and d) the protection of children from harm. Similarly, the Government's strategy declares its aim to be cutting "alcohol-fuelled crime and anti-social behaviour", presumably with the same ends in mind. We submit that any step which restricts the availability of information about licensing applications to the public is inimical to the statutory objectives because it consequentially limits the opportunities for concerned citizens to find out about those applications, to debate them in a public forum and to make representations to their elected representatives or the relevant licensing committee.
2. The 'impact assessment' produced for the Home Office puts the case for dropping the advertisements as a simple solution to what it calls an "unnecessary bureaucratic burden". It treats the advertisements as an inconvenience that gets in the way of the process. The impact assessment has missed the point. Informing and involving the public in the licensing process is central to the statutory purpose and the 'transparency' which the Government says it wants. The Government must therefore choose the most effective way of advertising if it is to satisfy either the statutory objectives or its own professed policy objectives.
3. Once it is acknowledged that the information and involvement of the public is essential to the statutory purpose and the fulfilment of the Government's own strategy, then the decision as regards the need for advertising in local newspapers becomes much easier. Only the local newspaper can provide an effective, independent and trusted platform for both information and discussion, in print and online. It is only in the local newspaper that the real

process of popular democratic debate among ordinary citizens about such matters takes place – not anywhere else, least of all on a council website. Notices stuck outside the premises or filed away on council websites (invariably requiring passage through several links to find them) are no more than a passive means of making the information available to those people with the time, energy and inclination to look. Using such means relies on chance or else shifts the burden and expectation onto the public to go out and find the information rather than having it brought to their attention. But flapping pieces of paper on a wall or lamp-post are seen by few and read by fewer, and soon become tumbleweed on the streets. And it would take an especially dedicated person with a good deal of time to spare to reserve a slot in their day, say once a week, to visit and search their complicated local council website to find the digital cul-de-sac containing the public notices, just on the off-chance that there might be a licensing application relevant to their area (and that assumes the council is fulfilling its 2012 legal obligation to carry such applications on their websites in the first place). By contrast, newspapers actively bring the information home to the reader. Newspapers are bought with the shopping or drop through letterboxes into the home, bringing not just public notices, but all the local news and debate to immediate attention. And they inform the whole community, not just the neighbours who are directly affected because they live next door to the applicant's premises. People take time to browse the newspaper, where of course they will see the licensing notices. And not just the licensing notices. They will also see the extensive coverage that local newspapers give the stories and comments behind those licensing applications. This is a significant factor which the Home Office impact assessment has failed to recognise. Public notices in local newspapers are published in a context that no other medium can deliver – a lively and engaging marketplace for the exchange of local news, gossip and ideas, both in print and online, which offers up issues like the licensing of pubs and clubs for regular attention and debate. The proposal to remove the obligation to advertise applications in local newspapers may be bureaucratically convenient for town hall civil servants and the alcohol industry, but it will inevitably erode the opportunity for public participation in decisions that deeply affect the day-to-day lives of very large numbers of people and about which our own experience shows they are very much concerned. Only a local newspaper can provide the level of democratic engagement with the community that the process really requires.

4. The figures prove it. Independent research by GFK NOP in 2012 shows that local newspapers and their websites are by far the best media channel for public notices of any kind. GFK found that eight times as many people had read a newspaper in the past week than had looked at their council website (33 million as against 4 million adults).
5. GFK also established that 29% of all adults had not accessed the internet at all in the last 12 months, meaning that advertising licensing applications online only would exclude 14 million UK residents, many of them the poorer members of society. And according to the Office for National Statistics, 25% of UK households did not have a home computer as recently as 2011, with more than a third of low-income households having no home computer – which means that 9.2 million adults are without access to the internet. In fact, according to the ONS, there were still 7.63 million adults in the UK in 2012 who had never used the internet at all. Therefore, confining a public notice to the wasteland of a council website is not only

an inefficient way of reaching people, it is in fact wholly ineffective for a large proportion of the population, who are thereby shut out of the debate.

6. By contrast, people positively expect to find public notices in their local newspaper and know where to look. They also lap up the controversies the applications regularly generate on the news pages. Research by Wanted Ads/TNS for the Newspaper Society found that 36% of adult regular readers (of working age 16-65) tended to read the public notices section of their local daily newspaper and 37% in respect of weekly local newspapers. Placing advertisements in local newspapers ensures that they reach their target audience – the local community which will be directly affected by the relevant application. If the Government is committed, as it says it is, to pursuing its strategy and meeting the statutory objectives then advertising in local newspapers remains demonstrably necessary.
7. The impact assessment focuses only on the relatively small cost-savings that might be achieved by scrapping the requirement. And yet these are savings not for the local authority or the taxpayer but for the alcohol industry. There is also an inescapable irony in a policy proposal that ostensibly seeks better control of the availability of alcohol but which begins by trying to make it a little bit easier and cheaper for the alcohol industry to make it available in the first place. We respectfully submit that the transparency of local government processes and the democratic right of citizens to know about and get involved in the debate cannot be discarded merely to save the breweries, clubs and restaurants the price of an advertisement. If the Government is serious about tackling alcohol-fuelled crime and anti-social behaviour then it must engage with its citizens and not exclude them.
8. The impact assessment expressly acknowledges that:

“There is a risk that the public protection objectives of the Licensing Act may be undermined because persons who might otherwise be motivated to make representations by a local newspaper or circular may not have access to the internet and not live sufficiently near to see the physical notice.”

But the Home Office assessment casually goes on to dismiss these concerns about the “negative impact on the licensing objectives” on the basis that it believes there to be “anecdotal evidence from licensing officers that extremely few representations are motivated by advertisements in newspapers and circulars”. Quite apart from the fact that a local authority officer cannot know or is very unlikely to know what has privately motivated an individual’s representation to the licensing committee, for the Home Office to think about entertaining a recommendation based on unspecified and unsubstantiated “anecdote” would be extraordinary. Moreover, it flies in the face of the experience we encounter every day and can demonstrate in the pages of our titles both in print and online. If citizens are not actually making formal representations to licensing committees about alcohol licence applications in large numbers (which in fact has not been demonstrated in any event), that is much more likely to have something to do with the failure of local government to connect with the public generally on these issues or to make it easy and worthwhile to get involved with the council’s own procedures. Our experience is undoubtedly that the newspaper-reading public are nevertheless deeply interested and

worried by the proliferation of alcohol on the high street and the way it affects their quality of life. We know this because they say so in our newspapers and on our online comment pages, where democratic debate is thriving. The 'anecdote' to which the impact assessment refers merely demonstrates precisely what we are saying: that the local authority cannot generate the same level of involvement that a newspaper can.

9. The licensing officers to whom the compilers of the Home Office impact assessment allegedly obtained these 'anecdotes' might be best advised to read their local newspaper if they genuinely want to find out what the public actually think about any particular application. For instance, we checked at random with three well-known Newsquest titles across the UK. Firstly, from the North East, The Northern Echo, a regional daily in Darlington. In the last month alone, (from December 17 2012 to January 19 2013) The Northern Echo has published 13 news stories relating to alcohol licensing issues - seven of those being the lead stories on the relevant pages. Moving southwards, the Telegraph and Argus in Bradford and its associated weeklies published at least 39 news stories relating to alcohol licensing in 2012, mostly page-leads, and the Oxford Mail published six significant page-lead news stories in the second half of 2012. That is not to mention associated readers' printed letters and online comments.
10. The Government has previously rejected proposals to remove the statutory requirement to advertise planning notices (in 2009), and the Welsh Assembly rejected similar proposals in relation to traffic notices. At a newspaper conference meeting in December 2012, Eric Pickles MP, Secretary of State for Communities and Local Government, repeated his intention to stick to the commitment made when coming into office not to remove statutory public notices from local newspapers during the lifetime of this Parliament.
11. It is right and entirely relevant to the strategy's objectives that the Government should take full account of the financial impact on local newspapers of withdrawing the requirement to publish alcohol licensing advertisements. Lord Leveson's Report into the culture and practices of the media singled out local newspapers for praise and highlighted their commercial vulnerability and the importance to them of advertising revenue. In particular, he said:

"As to the commercial problems facing newspapers, I must make a special point about Britain's regional newspapers. In one sense, they are less affected by the global availability of the biggest news stories but their contribution to local life is truly without parallel. Supported by advertisements (and, in particular, local property, employment, motor and personal) this source of income is increasingly migrating to the internet; local councils are producing local newsletters and therefore making less use of their local newspapers. Many are no longer financially viable and they are all under enormous pressure as they strive to re-write the business model necessary for survival. Yet their demise would be a huge setback for communities (where they report on local politics, occurrences in the local courts, local events, local sports and the like) and would be a real loss for our democracy. Although accuracy and similar complaints are made against local newspapers, the criticism of culture, practice and ethics of the press that have been raised in this Inquiry do not affect them: on the contrary,

they have been much praised. The problem surrounding their preservation is not within the terms of reference of the inquiry, but I am very conscious of the need to be mindful of their position as I consider the wider picture."

And we urge the Government also to consider this wider picture. A world without local newspapers is a world without independent local scrutiny and popular debate. How then will the anxieties of the public about problems in the communities where they live be expressed and communicated, not least the problem of alcohol-fuelled crime?

12. In making its pricing assumptions, the impact assessment given to the Home Office has significantly exaggerated the current price of a public notice and therefore the overall cost to the alcohol industry. The Daily Echo, a major regional newspaper in Southampton (a Newsquest title we picked at random and called without warning on 25th January 2012) is presently offering a large public notice of 12cm x 3 columns for £306 plus VAT, not the £450 upper limit on which the assessment bases its calculations and recommendations to the Home Office. We venture that most straightforward notices might be accommodated in notices much smaller than that. For instance, the Salisbury Journal, a weekly Newsquest title not far away, was on the same day offering an 8cm x 1 column public notice, for just £80 plus VAT – which renders the impact assessment's calculation totally meaningless. The fact is that the newspaper industry recognises that its clients are facing economic difficulties as well, and prices are quoted flexibly and competitively where possible in response to those pressures. One-off costs at these levels might be an irritant but we submit that they are largely inconsequential to the alcohol industry, while on the other hand the loss of the reliable regular income they bring could be another nail in the coffin for some newspaper titles. The question the Government has to ask itself is whether these relatively small sums are all it thinks a free press and vibrant local democracy are really worth?

