



Bond Street | Oxford Street | Regent Street

## **New West End Company – Strategic response to Licensing Consultation**

13 November 2020

Sent via email to: [licensingconsultation@westminster.gov.uk](mailto:licensingconsultation@westminster.gov.uk)

Whilst welcoming the additional flexibilities offered in the proposed draft Licensing Policy brought forward by Westminster City Council, The New West End Company retains a number of significant concerns that the draft Statement of Licensing Policy will not support growth in the International Centre or the economic recovery post Covid-19 and consider that there is some conflict between the Zones and the emerging strategy for the regeneration of the Oxford Street District, particularly the need for greater flexibility of uses.

Our first concern relates to the Cumulative Impact Assessment and the data which has been used to inform the subsequent policy proposals. Whilst welcoming the data-driven approach provided by the policy, we are however concerned that the data used to justify the decisions and changes in the draft policies has a number of significant issues and deficiencies. Firstly, much of the data around crime and anti-social behavior cannot be attributed to individual licensed premises. In addition to this, footfall has not been overlaid to provide an appropriate context to the data. We are also concerned that the data does not take into account the reduction in Metropolitan Police Service resources and officers allocated to the respective areas, and that much of the data is as also too old to be relevant to decisions being taken today.

Our second concern is that the additional flexibilities outlined in the policies do not go far enough. Whilst introducing a policy presumption in favour of new restaurants to operate to Core Hours is a welcome move, we cannot see any justification for a proposed terminal hour of 9pm for new bars or pubs, fast-food premises or dance venues. This is particularly relevant in the Oxford Street District and International Centre where the planning system is increasingly supportive of a greater flexibility of uses.

We also have reservations about the timing of the consultation being undertaken. The proposals represent the most significant change to Westminster's licensing policies in a generation, at a time when the future of central London is at stake and the full impact of Covid-19 has yet to be fully understood. We would therefore encourage Westminster to commit to further annual reviews for at least the next three years where the policy can be assessed both against the recovery of the evening and night-time economy and its ability to offer additional flexibilities around uses.

As a further point, we are also concerned about the uncertainty with regards to new applications and extensions of hours in Special Consideration Zones. How these applications would be determined, and the ability for operators to evidence that they are well-run is unclear. If an applicant is to invest in applying for an extension of their license, additional comfort is required in these areas in order to avoid effectively being at the whim of a licensing committee or held responsible for data and local issues which are outside of their area or control.



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Finally, we would encourage Westminster to acknowledge the significant role that BID's play in the management of the evening and night-time economy. As Police resources have been withdrawn, the BID's have stepped-up, investing in their on-street teams and cleansing services to ensure the provision of a safe and welcoming environment for visitors.

For all of these reasons, whilst welcoming the direction of travel in providing more flexibilities than existed under previous policies, we are concerned about the additional uncertainty and that the proposed new policies could actually fail to support the evening and night-time economy or the recovery of central London at this critical time.